Chapter 3

Response to Comments on the Draft EIR and Recirculated Draft EIR

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

Lead agencies are required to evaluate all 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 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 3, *Clarifications and Modifications to the Draft EIR*, outlines the revisions to the Draft EIR.

3.2 List of Commenters

The public agencies, organizations, and private citizens who submitted comments on the Draft EIR during the public review period are listed below. Please note one comment was received after the review period closed and has been included as letter O9. The comment letters and their responses are arranged by public agencies (A), organizations (O), and individuals (I).

Table 3-1. List of Commenters

No.	Name	Agency/Organization	Date
Agencies on Draft EIR			
A1		California Department of Fish and Wildlife (CDFW)	November 15, 2021
A2		San Diego Regional Water Quality Control Board	September 30, 2021

No.	Name	Agency/Organization	Date
A3		San Diego Regional Water Quality Control Board	October 15, 2021
Agencies on Recirculated Drafted EIR			
A4		California Department of Fish and Wildlife (CDFW)	February 27, 2023
A5		San Diego Regional Water Quality Control Board	December 16, 2022
Organizations on Draft EIR			
O1		San Diego Audubon Society	November 9, 2021
O2		San Diego Chapter of California Native Plant Society (CNPS), Sierra Club San Diego Chapter, and Environmental Center of San Diego	November 15, 2021
O3		Save our Heritage Organization (SOHO)	November 10, 2021
O4		Back Country Land Trust (BCLT)	October 28, 2021
O5		Endangered Habitats League	November 2, 2021
O6		Preserve Alpine's Heritage	October 12, 2021
O7		Preserve Alpine's Heritage	November 11, 2021
O8		Preserve Alpine's Heritage (Chatten Brown	November 15, 2021
O9		Cleveland National Forest Foundation	May 18, 2022
Organizations on Recirculated Drafted EIR			
O10		Preserve Alpine's Heritage	February 18, 2023
O11		San Diego Audubon Society	February 28, 2023
O12		San Diego Chapter of California Native Plant Society (CNPS), Sierra Club San Diego, and Environmental Center of San Diego	February 28, 2023
O13		San Diego Mountain Biking Association (SDMBA)	February 6, 2023
O13a		San Diego Mountain Biking Association (SDMBA)	December 22, 2022
Individuals on Draft EIR			
I1	August, Dawn		November 12, 2021
I2	Bach, Brad		November 15, 2021
I3	Benjamin, Elaine		November 13, 2021
I4	Bennett, Kymberly		November 2, 2021
I5	Borchmann, Patricia		November 15, 2021
I6	Brown, Garth		October 15, 2021
I7	Cadenhead, Keli		November 15, 2021
I8	Carroll, Alejandra		November 15, 2021
I9	Casas, Hector		November 14, 2021
I10	Castle, Sandy		November 6, 2021
I11	Christine, John		October 7, 2021

No.	Name	Agency/Organization	Date
I12	Cooper, Vic and Ramona		November 15, 2021
I13	DeForest, Dain		November 15, 2021
I14	de la Torre, Dana & Kevin		November 14, 2021
I15	Figari, Christine		November 15, 2021
I16	Figari, Robert		November 15, 2021
I17	Forsburg, SL		November 15, 2021
I18	Fregoso, Rafael		November 15, 2021
I19	Funtas, Michael		November 17, 2021
I20	Furasek, Christina & Aaron		November 5, 2021
I21	Green, Jon		November 15, 2021
I22	Gula, Jonah		November 15, 2021
I23	Harris, Mary 1		October 15, 2021
I24	Harris, Mary 2		October 21, 2021
I25	Harris, Mary 3		October 22, 2021
I26	Herrin, Summer		October 15, 2021
I27	Hicks, Mary		November 15, 2021
I28	Hohimer, Don		November 15, 2021
129	Jacobs, Jim		October 19, 2021
I30	Katz, Peggy		November 15, 2021
I31	Krantz, Peter		November 15, 2021
I32	Larm, Annalisa		November 15, 2021
I33	Light, Jeff and Alanna		November 12, 2021
I34	Lind, Angie		October 8, 2021
I35	Lundstrom, June		October 10, 2021
I36	Mason, James		November 14, 2021
I37	Norton, Anne Falasco		November 14, 2021
I37a	Norton, Anne Falasco		May 2, 2022
I38	Norton, Courtney		November 15, 2021
I39	Norton, Kyle Ogle & Dominique		November 15, 2021
I40	Nuger, Laurie		November 15, 2021
I41	Nygaard, Joyce		November 15, 2021
I42	Oconner, Kevin		November 8, 2021
I43	Orband, Jay		November 15, 2021
I44	O'Sullivan, Rebecca		October 1, 2021
I45	Pavich, Miles & Amanda		November 16, 2021
I46	Pollioni, Parnell		September 30, 2021
I47	Rader, Michelle		November 15, 2021
I48	Ranucci, Denae		November 15, 2021
I49	Recabaren, Warner		November 15, 2021
I50	Ripperger, Ronald		November 11, 2021

No.	Name	Agency/Organization	Date
I51	Roberts, Charles		October 7, 2021
I52	Root, Jody and Sharon		November 11, 2021
I53	Smith, Mary		November 15, 2021
I54	Smith, Ron		November 15, 2021
I55	Stanko, Allen		October 24, 2021
I56	Stanko, Allen		November 20, 2021
I57	Stockmoe, Nicole		September 30, 2021
I58	Stout, Yolaine		November 13, 2021
I59	Stumbaugh, Darcy		November 15, 2021
I60	Thomas, Kyle		November 16, 2021
I61	Van Hyfte, Debbie		September 3, 2021
I62	Walker, Virginia		November 12, 2021
I63	Wiley, Chris		September 30, 2021
I64	Williams, Patrick		November 15, 2021
I65	Wirtz, Jean and Carl		November 11, 2021
I66	Yeiser, Pamela		October 15, 2021
I67	Zub, Carrie		October 29, 2021
Individuals on Recirculated Drafted EIR			
I68	August, Daniel		February 25, 2023
I69	August, Russ and Dawn		February 25, 2023
I70	Bach, Brad		February 24, 2023
I71	Barrett, Robert		February 15, 2023
I72	Bizzoco, Rick		February 2, 2023
I73	Bohmfalk, Adah		February 28, 2023
I74	Bolz, Jacob		January 31, 2023
I75	Boyer, Judie		February 13, 2023
I76	Cecil, James		February 20, 2023
I77	Charvat, Jan		December 21, 2022
I78	Conway, Jerry		February 7, 2023
I79	DeGero, Gay		February 27, 2023
I80	Figari, Christine		February 27, 2023
I81	Figari, Robert		February 19, 2023
I82	Flora, Diane		February 7, 2023
I83	Funtas, Michael		February 4, 2023
I84	Gould, Nina		February 28, 2023
I85	Guishard, Tim		December 18, 2022
I86	Gula, Jonah		February 27, 2023
I87	Harmon, Kimberly and Tracey		February 2, 2023
I88	Hiebing, Gary		February 7, 2023
I89	Kusler, Heather		February 26, 2023

No.	Name	Agency/Organization	Date
I90	Light, Jeff and Alanna		February 25, 2023
I91	Lundy, Erick		December 17, 2022
I92	Mason, James		February 27, 2023
I93	Meyer, David		January 30, 2023
I94	Murillo, Vince		December 27, 2022
I95	Murphy, Susie		January 4, 2023
I96	Norton, Annie		February 26, 2023
I97	Norton, Courtney		February 27, 2023
I98	Norton, Dominique and Ogle, Kyle		February 27, 2023
I99	Nygaard, Joyce		February 27, 2023
I100	Onwingz		December 16, 2022
I101	Peck, Audrey		February 21, 2023
I102	Peck, Audrey		February 27, 2023
I103	Peck, James		February 26, 2023
I104	Phelps, JP		January 10, 2023
I105	Plis, Judy		January 30, 2023
I106	Ranucci, Denae		February 27, 2023
I107	Ripperger, Ronald		February 26, 2023
I108	Root, Jody		December 23, 2022
I109	Root, Jody		December 27, 2022
I110	Root, Jody		February 28, 2023
I111	Scriber, Michael		January 13, 2023
I111a	Scriber, Michael (voicemail)		January 13, 2023
I112	Scriber, Michael		February 2, 2023
I113	Scriber, Michael		February 8, 2023
I114	Scriber, Michael		February 13, 2023
I115	Simper, Julie		February 7, 2023
I116	Smith, Mary		February 14, 2023
I117	Smith, Ron		February 14, 2023
I118	Smith-Ward, Lori		February 2, 2023
I119	Stanko, Allen		February 24, 2023
I120	Stout, Yolaine		February 28, 2023
I121	Thompson, Terri		December 16, 2022
I122	Van Hyfte, Debbie		December 17, 2022
I123	Walker, Virginia		February 9, 2023
I124	Williams, Patrick		January 5, 2023
I125	Williams, Patrick		February 28, 2023
I126	Smith, Sheri (voicemail)		December 20, 2022

3.3 Comments and Responses to Comments

3.3.1 Master Responses

Several comments made on the Draft EIR raised similar issues regarding a number of common topics. The following Master Responses are provided to address those general comments. References that exist within comments to specific Master Reponses have been compiled into a list and can be found in Attachment 2, *Alpine Master Response Comment Index.*

Master Response MR-1 (Western Spadefoot Recirculation)

Commenters noted that western spadefoot (*Spea hammondii*) is known to occur on Wright's Field and an egg mass for this species was observed during the project's 2019 fairy shrimp surveys within the proposed Alpine Park footprint. The Draft EIR did not discuss impacts on western spadefoot. Since the public comment period closed for the Draft EIR, the County of San Diego (County) has conducted focused surveys for western spadefoot within its property, as well as within the known population on the Wright's Field Preserve. The results of these surveys and a complete impact analysis have been provided in the Recirculated Sections of the Draft EIR (RS-Draft EIR). Specifically, Section 4.4 of the Draft EIR and the Biological Resources Report (BRR) were revised to include this analysis. A western spadefoot survey report was also prepared and included in the RS-Draft EIR. Because impacts on western spadefoot from the project are anticipated to be significant absent mitigation, **MM-BIO-4** would reduce impacts on this species to less-than-significant levels.

Master Response MR-2 (Indirect Impacts on Wright's Field)

Commenters expressed concern for indirect impacts this project may have on Wright's Field. Indirect impacts on Wright's Field biological resources have been refined and expanded upon in the RS-Draft EIR. Potential impacts from construction of the project would occur approximately 600 to 800 feet from the eastern edge of Wright's Field. The Alpine Park Preserve would be located between the Alpine Park and Wright's Field Preserve. At this distance, indirect impacts from construction work and operation of the active park have been determined to be: (a) less than significant with mitigation (e.g., pertaining to noise or dust mitigation), (b) less than significant (e.g., only minor impacts on wildlife in the open space areas adjacent to the park) or (c) no impact (e.g., no operational night lighting, only motion sensor security lighting).

Discussion of impacts on Wright's Field associated with formalizing the existing onsite trails has also been expanded upon in the RS-Draft EIR and indicates there would be no new significant impact on biological or cultural resources. The County worked closely with the Back County Land Trust (BCLT) in developing the proposed trails to be formalized and, at their direction, chose to formalize trails on the County parcel that would direct people away from the most sensitive resources on the Wright's Field Preserve. For example, the County would close a trail leading from its parcel into a particularly sensitive location in Wright's Field that is known to support the western spadefoot.

Although operation of the project and its associated trails has the potential to increase usage on trails within the adjacent Wright's Field Preserve, impacts on the Wright's Field trail system from the presence of the active use park are not expected to dramatically change the nature or intensity of trail usage on Wright's Field. This is because of both the distance from the park to Wright's Field and because of different usage preferences. Users who come to the active use park for ball sports or skateboarding are not anticipated to also be hiking the distances required to access Wright's Field

regularly. Usage of the trails is driven more by the patterns of user groups in the larger community who seek the natural environment for recreation, rather than others in the community who would seek the types of recreational opportunities the active park affords.

Although some increase in trail usage can be expected from easier parking opportunities within the project, users can currently park along South Grade Road to access trails within the County's parcel and do so regularly. Wright's Field also has its own formal and informal entrance points, which the project would not affect. Wright's Field's formal entrance into the trails system is roughly 0.5 mile from the County property. Usage of trails on Wright's Field is anticipated to be driven much more by changing conditions in the larger community, including population growth and availability of other open space areas, and even by public health hazards such as during the coronavirus pandemic when increased park usage was observed throughout San Diego County. Furthermore, park signage would make it clear that visitation of the Wright's Field area is conditioned upon appropriate and respectful behavior regarding the natural attributes of the site. As a result, operation of the proposed park and associated trails is not anticipated to result in significant impacts on biological or cultural resources in the adjacent Wright's Field Preserve.

Master Response MR-3 (Native Grassland Impacts)

Commenters noted the need for the County to provide in-kind mitigation for impacts on native grasslands. The County provides compensatory mitigation for its projects consistent with its Biological Mitigation Ordinance, which allows for mitigation to be provided by tiered categories. Native grasslands and Engelmann oak woodlands are examples of Tier I vegetation communities. As detailed in the Draft EIR, the County would provide for mitigation of Valley needlegrass grasslands by securing Tier I mitigation lands with the intention to prioritize Valley needlegrass grasslands. The County would implement **MM-BIO-10** for impacts on Valley needlegrass grassland as follows, which is further detailed in the RS-Draft EIR in Section 4.4, *Biological Resources*:

1. Restore nonnative grasslands to native grasslands within the County's parcel.
2. Restore additional nonnative grasslands to native grasslands on the Wright's Field Preserve.
3. Preserve offsite land to mitigate for nonnative grasslands.
4. Apply Tier I mitigation within the Alpine Park Preserve for impacts on native grasslands.

Master Response MR-4 (Natural Resource Mitigation)

Commenters provided concerns regarding natural resource mitigation and the associated timing. There are two aspects related to the application and scheduling of natural resource mitigation; these are outlined below.

Resource Management Plan

Mitigation will occur through the preservation of habitat onsite with management and monitoring defined in the Resource Management Plan (RMP) that will be developed prior to formalizing trails and before opening the Alpine Park Preserve to the public (see applicant-proposed measure **[APM]-BIO-1**). An RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's Multiple Species Conservation Program (MSCP) Subarea Plan (County 1997), the Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). These sections specify that the County will be responsible for managing

lands that it owns or acquires within the MSCP preserve system. These sections further mandate that the RMP will be written to minimize impacts on MSCP Covered Species and species that share similar habitats. The MSCP is a rigorous program with scores of RMPs for similar preserves, with a prescriptive process that has been established with mandatory certainty. As such, the public and agencies will have a clear understanding of what will be contained in the RMP for the Alpine Park Preserve. Based on the above information, mitigation is not improperly deferred. No changes to the Draft EIR are needed.

Quino Checkerspot Butterfly Mitigation

In *Clover Valley Foundation v. City of Rocklin*, 197 Cal. App. 4th 200 (2011), the court determined that it was permissible for the project to obtain all necessary federal and state permits from the U.S. Army Corps of Engineers and California Department of Fish and Wildlife (CDFW) for impacts on protected bird habitat. When it is expected that another agency will impose mitigation measures on a project, as the U.S. Fish and Wildlife Service (USFWS) has done with this project, the project's CEQA document must still commit itself to mitigation, identify the methods the agency should consider and possibly incorporate, and indicate the expected outcome. *Rialto Citizens for Responsible Growth v. City of Rialto,* 208 Cal. App. 4th 899 (2012) held that formal consultation with USFWS was appropriate and that proposed methods, including avoidance, minimization, and purchase of offsite habitat, ensured impacts would be mitigated as part of that consultation process and, therefore, mitigation was not deferred. **MM-BIO-3** states that the County Department of Parks and Recreation (DPR) shall seek from USFWS a Section 10 Incidental Take Permit (ITP) (or Section 7 ITP if there is a federal nexus) for impacts on Quino checkerspot butterfly (QCB)-occupied habitat, and that regardless of the conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat (as further described in **MM-BIO-3**). **MM-BIO-3** also states that construction activities shall not occur until the ITP is secured. The performance standard is specified (i.e., no net loss of QCB host plants), and compensatory onsite mitigation and monitoring standards are also included in **MM-BIO-3**. **MM-BIO-3** was revised slightly in the RS-Draft EIR to make it clear that the County intends to provide compensatory mitigation and habitat restoration as well as monitoring regardless of the status of the ITP. Mitigation is therefore not deferred.

Master Response MR-5 (Additional Species Analysis)

This response is provided to answer questions regarding the analyses of several species. Section 4.4, *Biological Resources*, was revised in the RS-Draft EIR to address impacts on the western spadefoot and to further refine the impact analysis and mitigation proposed for special-status bat species and burrowing owl, and includes analysis for additional special-status species as requested by the wildlife agencies and public commenters. Additional analysis has been provided in the RS-Draft EIR for the species mentioned and additional significant impacts and required mitigation are also discussed. See **APM-BIO-1** and **MM-BIO-1** through **MM-BIO-10**.

Master Response MR-6 (Wildlife Corridors)

This response is provided in for Comment Letter O8 from Preserve Alpine's Heritage and similar comments. The RS-Draft EIR provided additional details on how the project could affect wildlife connectivity and corridors. Additional significant impacts on wildlife movement are not anticipated.

The Preserve Alpine's Heritage letter refers to a 2003 grant application prepared by BCLT and the County that includes a discussion of "Phase IV" of the Wright's Field project. The Phase IV

boundaries include the currently owned County parcel, plus a 40-acre parcel at the southwest corner of Wright's Field, which is privately held at present. When the Phase IV parcel was described as a wildlife corridor, it included this privately held parcel, which would indeed provide a key access point along Chocolate Creek to points west of Wright's Field. However, that parcel was not acquired by County DPR and is not part of the project.

Furthermore, additional residential development has occurred since the 2003 grant application that substantively changed how wildlife can move to the north and east of the County parcel. Specifically, three large houses to the north of the County parcel along Engelmann Oak Lane were built after the 2003 grant application; they further restrict movement of terrestrial mesofauna to the north. Two additional homes east of the intersection of South Grade Road and Boulder Oak Lane were also built after the 2003 grant application was prepared. Those homes constrain wildlife movement from the far northeastern corner of the County parcel to points farther east.

Large-lot residential development, many with perimeter fences, restricts wildlife movement from due east of the County parcel to points farther east. Wildlife movement, therefore, on the north and east of the County parcel is constrained to backyards where there may be gaps in fences or where animals can move under or over fences.

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

Increases in traffic along South Grade Road caused by the project are not anticipated to result in a significant impact on the existing wildlife movement in this area compared to baseline conditions. While there may be increases in traffic from the project along South Grade Road, the number of individual animals that would be killed from this increased traffic is unlikely to result in a regional long-term decline of any Group II animal species, and increases in traffic are unlikely to affect any California Species of Special Concern that could occur within the County's parcel or adjacent open space areas. No changes to the Draft EIR are needed.

Master Response MR-7 (Transportation and Safety)

Transportation Impact

Commenters raised concerns about transportation impacts and the performed vehicle miles traveled (VMT) analysis through their comments; this response aims to address those concerns. The transportation impact associated with the project was assessed using a qualitative analysis of the project's effect on regional VMT. The County adopted a new Transportation Study Guidelines in September 2022. These County-specific thresholds are in accordance and aligned with the industry's best practice, and guidance from the Governor's Office of Planning and Research (OPR) to conduct

the VMT analysis. Similar to locally serving retail, where the addition of locally serving public amenities/recreation typically redistributes existing trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a project's transportation impact. A qualitative analysis of the VMT associated with a locally serving recreational project is appropriate; such a method has been adopted by other lead CEQA agencies such as the City of San Diego and the City of Chula Vista in their respective Transportation Study Manuals. This approach is also consistent with CEQA Guidelines Section 15151, which states, "An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible."

Based on the criterion provided therein as well as Attachment A of Appendix I, the project would fall under the local-serving public facilities and other uses (open space preserves, local parks, and trailheads) category. The County Transportation Study Guidelines state that local-serving public facilities and other uses are presumed to have less-than-significant VMT impacts. The addition of a local-serving park to a location where a park does not exist changes the trip patterns of the residents of the community. Therefore, trips would be generally shortened because residents would no longer have to travel outside of the community to enjoy park amenities. For example, the nearest parks to the residents of Alpine and surrounding communities with comparable amenities are Flinn Springs County Park and Pine Valley County Park, approximately 8.2 miles (driving distance: one way) and 15.1 miles (driving distance: one way), respectively, from the community of Alpine. Therefore, with construction of the project, trips made by Alpine residents associated with parks would be largely internalized within the community of Alpine, thereby shortening trips and reducing their VMT per capita. Reduction in VMT per capita helps the County achieve its long-term climate goals of reducing greenhouse gas (GHG) emissions. Additionally, according to the transportation section in Appendix G of the 2022 CEQA Statutes and Guidelines, the project would not cause a significant transportation impact.

The project would not be in conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities. A decomposed granite (DG) walkway would be implemented throughout the project site. Neither the Metropolitan Transit System Association nor the San Diego Association of Governments (SANDAG) plans to provide transit services along this portion of South Grade Road due to historically low ridership, so the project would not conflict with any planned transit policy or services.

The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Under the project, South Grade Road would retain its existing configuration. The existing shoulder may be used by bicycles. County roads also permit bicycle use. No changes to the Draft EIR are needed.

Roadway Operation and Safety

The roadway operation analysis for the project was conducted using the trip generation rates from SANDAG's *(Not so) Brief Guide to Vehicular Traffic Generation Rates for the San Diego Region* (April 2002). As shown in the operation analysis, the project is anticipated to generate an average of 480 daily trips, including 20 trips (10 inbound/10 outbound) during the AM peak hours and 39 trips (20 inbound/19 outbound) during the PM peak hours. Note that these trips include trips associated with park staff, maintenance crews, and the public.

As shown in the roadway operation analysis, the project would not add a significant number of trips onto South Grade Road to degrade it to a substandard level of service (LOS). Therefore, roadway widening is not contemplated or required for the project. Additionally, roadway widening could have unintended consequences such as additional transportation impacts due to induced growth, i.e., the widening of South Grade Road could potentially encourage more development in Alpine and increase the amount of traffic along South Grade Road. This is contrary to the project's intent and CEQA requirements. It is the intent of the project to be consistent with the County's Mobility Element Policies M-4.3 and M-4.5, which state that roadway design should be consistent with the existing rural character and compatible with the local terrain and the uses.

It should be noted that the County of San Diego Trail Master Plan identified a Priority 1 (high priority) Pathway between Alpine Boulevard and Tavern Road. Part of the pathway will be provided along the project's frontage, and the County will construct the remaining segments as funding becomes available. The South Grade Road Pathway will provide a connection for pedestrians, equestrians, and cyclists between Alpine Boulevard, the project, and beyond. However, the construction of the pathway is outside of the purview or requirements of this project.

In the interim, the project would retain the existing configuration of South Grade Road. Bicyclists may utilize the existing shoulder as well as County roads. No changes to the Draft EIR are needed.

Project Access

The project would include a multi-way stop control (MWSC) for the project's driveway and South Grade Road. While the project does not meet the minimum volume requirements in the MWSC Warrant (Caltrans 2014, Revision 6), minimum volume is only one of the criteria in the California Manual on Uniform Traffic Control Devices (CA MUTCD). Per CA MUTCD 2014, Revision 6, traffic volumes are not the only qualifier for consideration of an MWSC. Other criteria such as the need to control left-turn conflicts and proximity to locations with high pedestrian activity should also be considered for the implementation of an MWSC. The MWSC would also include a striped crossing feature for pedestrian, equestrian, and bicycle users to safely cross South Grade Road to access the project.

The appropriate traffic control device will be determined at the project's design level. Potential traffic control devices include yield signs, a roundabout, and side-street stop control. The reason that the appropriate intersection control device will be determined at the design stage is because, at the planning stage, the exact location of the project's driveway is not yet known and therefore conducting a sight distance analysis is not feasible. A site distance analysis will be conducted at the time of project design.

The proposed park would be open from sunrise to sunset; it is not intended to serve as an all-day/night park, such as those common in urban/urbanized areas of the County. Rather, the park is intended to serve as a daytime park. There are other recreational opportunities available in more urbanized areas for those seeking nighttime activities. No changes to the Draft EIR are needed.

Master Response MR-8 (Greenhouse Gases and Energy)

Commenters stated that the project's GHG, energy, and air quality impacts are underestimated due to the use of the urban setting in the California Emissions Estimator Model (CalEEMod) and that County DPR's survey indicated that a portion of visitors would come from outside of the Alpine community. The survey was conducted to obtain feedback from the public on the design of the

onsite skate park (now referred to as the "all-wheel" park). While the survey did indicate that a portion of those responding did live outside of the Alpine community, the "all-wheel" park is only one of many proposed uses.

The County adopted new Transportation Study Guidelines in September 2022. However, these County-specific thresholds are in accordance and aligned with the industry's best practice and guidance from the OPR to conduct the VMT analysis. Additionally, as explained in the VMT analysis, the addition of a park to a location where a park does not exist changes the trip patterns of the residents of the community. Consequently, trips would be generally shortened because residents would no longer have to travel outside of the community to enjoy park amenities. For example, the nearest parks to the residents of Alpine and surrounding communities with comparable amenities are Flinn Springs County Park and Pine Valley County Park, approximately 8.2 miles (driving distance: one way) and 15.1 miles (driving distance: one way) from the community of Alpine. Therefore, with construction of the project, trips made by Alpine residents associated with parks would be largely internalized within the community of Alpine, thereby shortening trips and reducing their VMT per capita. The VMT analysis conducted for the project does not "screen out" the project based on the small project criteria.

Reduction in VMT per capita helps the County achieve its long-term climate goals of reducing GHG emissions. Finally, the CEQA Guidelines state that, "An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Because the goal of the park is to be local serving for the Alpine community, it is likely to reduce VMT per capita, and a qualitative analysis is appropriate in this case. The analysis concludes that the project would have a less-than-significant VMT impact. Therefore, the conclusion included in Section 4.8.4.3 of the Draft EIR is correct.

Because the project would result in a less-than-significant impact for VMT, the project's mobile-source GHG emissions would not conflict with Senate Bill (SB) 743. Because reducing GHG emissions from passenger vehicles is one of the objectives of SB 743 and one of the overarching strategies of the California Air Resources Board's (CARB's) 2017 Scoping Plan, operation of the project would not conflict with the statewide GHG target for 2030 mandated by SB 32.

In response to comments that the Draft EIR fails to quantify the release of GHG emissions from the loss of open space land that provides carbon capture, the project includes vast amounts of vegetation that would remain on large portions of the project site. The effect of the loss of grasslands on the long-term GHG emissions was expected to be negligible. However, assuming 3 metric tons of carbon dioxide equivalent ($MTCO_2e$) per hectare per year[1] (1.2 $MTCO_2e$ per acre per year), the removal of 25 acres of grassland would increase the GHG emissions by 30 $MTCO_2e$ per year. Even assuming no sequestration from the park vegetation, this small increase in emissions would not change the GHG significance determinations. Furthermore, the project would conserve 72 acres of natural vegetation that would remain open space, which would help sequester carbon each year.

Commenters stated that the Draft EIR's finding of no significant GHG impacts, despite its failure to include any operational mitigation measures, lacks sufficient evidence and fails to disclose actual project GHG impacts. Contrary to these comments, Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR does quantify the project's short-term construction and long-term operational GHG impacts. It is expected that the life of the project would be 30 years. Therefore,

[1] https://nph.onlinelibrary.wiley.com/doi/full/10.1111/j.1469-8137.2004.01201.x

construction emissions were amortized by 30 years and added to the operational emissions. After mitigation, the project's 38 $MTCO_2e$ per year of construction emissions would be reduced to less-than-significant levels. As the project's long-term impacts were determined to be consistent with the goals of the 2017 Scoping Plan, no operational mitigation measures were required.

As discussed in Section 4.11.4.3 of the Draft EIR, implementation of the project would be compatible with the project site's Semi-Rural Residential (SR-2) land use designation. "Community Recreation" allows for recreational, social, or multi-purpose uses; is consistent with the activities proposed at the project site; and is an allowable use (subject to a Major Use Permit) within land zoned A70, Limited Agricultural Use. Therefore, the project would not conflict with existing land uses or zoning for the project site. Because the project would not include any components that would result in substantial unplanned population growth, it would be consistent with SANDAG's 2050 Regional Transportation Plan.

As discussed in Draft EIR Section 4.8, *Greenhouse Gas Emissions and Climate Change*, consistency with the 2017 Scoping Plan would not hinder the state from reaching its GHG reduction goals. A total of 76 percent of the project's GHG emissions would be from mobile sources, emissions of which are regulated at the state level. The Draft EIR discusses how the project would not impede the state's VMT reduction target. Furthermore, the emissions from water and electric sources would be reduced as the state reaches its SB 100 target, which again the project does not have control over. Therefore, the project is consistent with the 2017 Scoping Plan and no operational mitigation measures are necessary.

Section 4.3.4.3 discusses the project's potential conflicts with air quality plans. The simplest test to assess project consistency is to determine if the project proposes development that is consistent with the growth anticipated by the relevant land use plans that were used in the formulation of the Regional Air Quality Strategy and State Implementation Plan; if so, then the project would be consistent with the Regional Air Quality Strategy and State Implementation Plan. Moreover, if the project is consistent with the overarching goals (i.e., to reduce emissions and attain National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS]) and strategies (i.e., measures implemented to reduce emissions), then the project would be consistent with the Regional Air Quality Strategy and State implementation Plan.

The project site is within the jurisdiction of the County of San Diego Alpine Community Plan, which designates the site as Semi-Rural Residential (SR-2). Zoning for the site is A70, Limited Agricultural Use, and S80, Open Space. "Community Recreation," which allows for recreational, social, or multi-purpose uses, is consistent with the activities anticipated at the project site, and is an allowable use subject to a Major Use Permit within land zoned A70 (County of San Diego 2021). Therefore, the project would not conflict with existing land use or zoning for the project site. Furthermore, SANDAG's Regional Plan established a long-range blueprint for the San Diego region's growth and development through the year 2050. Because the project would not include any components that would result in substantial unplanned population growth, it would be consistent with the 2050 Regional Transportation Plan. In addition, the project would have less-than-significant impacts related to VMT, which would be consistent with the goals of SB 375 and SANDAG's Regional Plan.

Therefore, as the project would be consistent with the County's Zoning Ordinance, would not be growth inducing, and would not exceed the construction or operational significance thresholds, it would not conflict with or obstruct implementation of an applicable air quality plan. No changes to the Draft EIR are needed.

As discussed in Section 4.6.4.3 of this Final EIR, implementation of the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation. As indicated in Table 4.6-3, the average diesel fuel consumption during project construction would be 87,956 gallons per year and result in a nominal increase (0.038 percent) in county fuel use. Operational energy consumption of the project would represent an approximate 0.002 percent increase in electricity consumption over the current countywide usage, which would be a minimal increase compared to San Diego County's annual consumption. As shown in Table 4.6-4, project operations are estimated to consume approximately 42,038 gallons of gasoline fuel per year, which would increase countywide automotive fuel consumption by 0.003 percent. As such, project construction and operation would have a minimal effect on the local and regional energy supplies and would not require additional capacity. Similarly, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Master Response MR-9 (Wildfire)

This response is provided to address comments related to wildfire risks and emergency response and evacuation at the project site. The RS-Draft EIR includes revisions to Section 4.9, *Hazards and Hazardous Materials*, and Section 4.20, *Wildfire*. A Fire and Emergency Operation Assessment (FEOA) identifies specific wildfire risks at the project site (Rohde and Associates 2021). The FEOA dated June 25, 2021, is included in Appendix J of the RS-Draft EIR. The Alpine Community Park Fire Evacuation Analysis is included in Appendix K of the RS-Draft EIR. The letter from Alpine Fire Protection District (FPD) regarding fuel clearances is included in Appendix L of the RS-Draft EIR.

Wildfire Risks

Information from the FEOA has been included in the RS-Draft EIR acknowledging that the project site historically has been subject to wildfires due to fuel loading, terrain, weather, and other relevant factors identified by California Department of Forestry and Fire Protection (CAL FIRE). The following site-specific wildfire and ignition risks associated with the project site and recommended prevention measures are included in the RS-Draft EIR:

- **Proximity to South Grade Road, a known location with increased human-related fire ignition factors.** The location of South Grade Road poses elevated ignition risks because of passing vehicles—specifically vehicle exhaust, hot materials discarded from vehicles, vehicle accidents, off-road parking, dragging tow chains, or related hazards. However, the County will continue to maintain an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared, is required by the Alpine FPD, and is not part of this project. As part of the project, the County would create an additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint, for a total of 50 feet. As part of the project, the County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.
- **Adjacency of the site to substantial human activity, including homes and ranches.** The proximity of homes and ranches to County DPR and BCLT lands poses risks from human-related fire ignition factors extending from these properties to the site. For this risk, the County will continue to maintain a historically cleared and existing 100-foot buffer where vegetation has

been cleared. As part of the project, the County would create a 100-foot buffer that would extend from the volunteer pad.

- **Robust public usage of the site for both dispersed and organized recreation.** Human use could increase on the site with development of the park, thereby increasing the associated human-related fire ignition factors. The historical unregulated public use of these lands would now be regulated and managed by County DPR. Development of the sports fields, associated parking, public facilities, and support buildings would include landscaping to isolate these facilities from the surrounding wildland, which would reduce wildfire exposure and ignition risks. County DPR would coordinate with the utility service provider to consider undergrounding the adjacent electric utility services. Additional fuel reduction measures would also be implemented to further isolate these uses for public safety and ignition resistance.
- **Location of the park site with respect to historical major wildfire corridors.** Historical wildfire corridors that experience both Santa Ana winds and onshore wind-driven conditions are in proximity of the project site. Past wildfires have traversed this corridor. However, fuel modification and the placement of developed park features would aid in containing wildfire movement within this corridor. A fire line was established in the past within the Wright's Field site for containment purposes and will continue to be maintained by BCLT.
- **Heavy fuel concentrations on some County/BCLT lands.** Heavier fuels could present extreme burning characteristics during critical fire weather, including high thermal outputs, rapid rates of spread, and spotting. Because heavy fuel is concentrated primarily on BCLT lands, the County would coordinate with BCLT to alleviate wildfire risks and prevent fire from either entering the open space from adjacent property or moving through open space lands and affecting private properties.
- **Current off-road parking and occasional vehicle trespass.** Trespassing does occasionally occur, although vehicle access is currently blocked by light fencing. Park development is expected to strengthen the vehicle control barriers and provide improved fire-safe parking.
- **Potential increase in demand for local public safety resources due to the developed park use.** New demands on public safety resources resulting from the development of new park facilities are not expected to place immitigable demands on local fire or law enforcement services. For this risk, a full review of the existing response capability and potential development impacts was conducted, as discussed in the FEOA. In addition, the project would employ an onsite staff that would provide new security for park facilities upon build-out.

Additional fire prevention protocols recommended for site-specific wildfire and ignition risks in the FEOA would be implemented as project design features. These protocols are included in Section 4.20, *Wildfire*, of the RS-Draft EIR and are summarized below.

- County DPR shall design appropriate facility elements and ensure County fire and building code compliance to reduce wildfire risks for users and the area. Fire-resistive landscaping would create a fire-safe area where the two dog parks, three soccer fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that would protect the park from wildfire but also provide a temporary safe refuge area (Rohde and Associates 2021).

- All landscape vegetation on park premises would be consistent with the guidelines of the County Planning & Development Services as well as the County's approved fire-resistive landscape plant palette.
- Parking and equestrian areas would serve as emergency safe routes, providing broad expanses of non-combustible surfaces. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animals panicking during wildfires.
- County DPR shall implement a long-term fuel modification program with the goal to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for County DPR/BCLT site development, and ensure safe public refuge at key sites. Beyond the existing fuel modification maintenance, the County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of vegetation clearance adjoining the 30-foot buffer of vegetation clearance adjacent to the roadside within the proposed park footprint, as well as an additional 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.
- County DPR shall coordinate with neighboring entities, including BCLT, Alpine Fire Safe Counsel, Alpine FPD, San Diego County FPD, CAL FIRE, County Department of Public Works (DPW), and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
- County DPR shall comply with the Regional Wildfire and Evacuation Plan (see Section 4.20, *Wildfire*). The San Diego County Wildland-Urban Interface (WUI) Fire Emergency Response Plan has been updated for the Alpine southeast area as a part of the Rohde and Associates FEOA (Appendix J of the RS-Draft EIR). This document is the County standard emergency response and evacuation management plan format for wildfire.
- County DPR shall comply with the Site-Specific Wildfire and Evacuation Plan. The Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K of the RS-Draft EIR) to assess the time required for emergency evacuation from the project site under several scenarios. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not substantially increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

The project site is partially within a very high fire hazard severity zone (VHFHSZ), and heat or sparks from construction equipment or vehicles, use of flammable materials, and introduction of additional visitors to the project site have the potential to exacerbate wildfire risk and ignite adjacent vegetation. County DPR and its contractors would implement standard best management practices (BMPs) intended for the mitigation of potential ignition sources. BMPs include that all County vehicles would be required to carry a fire extinguisher in case of accidental fire ignition; vehicles would not be permitted to park or idle over dry brush; and proper wildfire awareness, reporting, and suppression training will be provided to construction personnel. Implementation of standard BMPs would reduce the potential for ignition and increase the ability of onsite workers and staff to control and extinguish a wildfire event.

As part of project operations, signs with park rules and regulations would be clearly posted, in compliance with County regulations. Rules that would be enforced by park employees would include, but not be limited to, the following: smoking would be prohibited, campfires and open flames would be prohibited, and barbeques would be locked on red-flag days. County DPR has procedures for the enforcement of "open flame bans," which are initiated by declaration of a red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points and park personnel would patrol the park to enforce the ban. The project would also comply with all applicable ordinances and regulations as discussed in Section 4.20, *Wildfire*, of the RS-Draft EIR.

As such, the RS-Draft EIR concluded that, due to implementation of the BMPs, fire prevention recommendations, project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations, sufficient controls would be in place to reduce the potential for the construction or operation of the project to exacerbate wildfire risks, including risks related to pollutant concentrations or exposure to people or structures, either directly or indirectly.

Emergency Response and Evacuation

Access to the park has been designed in coordination with County DPR, the County DPW, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. Fire protection services for the project site are provided by Alpine FPD, with Station 17 approximately 2.7 miles from the project site. Given the proximity of Alpine FPD Station 17, fire services would be able to respond to an emergency situation at the project site in under 5 minutes with initial resources, and within 15 minutes for a multi-unit response, which would be dispatched by the Heartland Dispatch Center, which would alert surrounding cooperating fire agencies. Additionally, Rhode and Associates (2021) concluded, based on similar parks in similar areas, that operation of the project would result in less than one emergency response call per day on average, which was estimated based on the number of daily park users at estimated peak visitation. Alpine FPD Station 17 currently conducts one to three service calls per day with substantial capacity for additional service calls.

Alpine FPD also has a joint agreement with neighboring fire agencies in the Central Zone of San Diego County for immediate services; it also maintains dispatch services through the Heartland regional dispatch center. Wildland fire protection for the immediate area of Alpine is provided in State Responsibility Area wildlands by the CAL FIRE San Diego Unit. CAL FIRE also provides structural fire and rescue services to the unincorporated areas of San Diego County. Some areas in the community of Alpine are covered by both agencies, with fire protection for Local Responsibility Area structural services provided by Alpine FPD and wildland fire protection provided to the State Responsibility Area by CAL FIRE. Automatic aid agreements exist between CAL FIRE, U.S. Department of Agriculture Forest Service, and Alpine FPD, ensuring a response from the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary. During project operation, County DPR would also work with Alpine FPD and the County Office of Emergency Services to coordinate emergency access and evacuation procedures, as necessary. Staff members would also become familiar with the San Diego County WUI Fire Emergency Response Plan for the Alpine southeast area and be prepared to integrate with public safety responders in response to emergencies at this site.

Additionally, a site-specific Alpine Park Fire Evacuation Plan (Appendix K of the RS-Draft EIR) was developed by CR Associates in October 2022. This analysis assessed the time required for evacuation from the project site under several scenarios (e.g., a wind-driven fire that results in a required evacuation, affecting the project site and surrounding community). The traffic evacuation analysis presented in the Alpine Park Fire Evacuation Analysis shows the vehicle travel times required under various evacuation events. The nine evacuation scenarios presented in the analysis found that evacuation traffic generated by the project would not increase average evacuation travel times significantly or result in unsafe evacuation timeframes. The flow of evacuation traffic would be effectively managed. Detailed results and discussions are provided under the respective sections of the analysis provided in Appendix K of the RS-Draft EIR.

The project proposes several features that would enhance evacuation operations; these are not reflected in the evacuation scenarios and average evacuation times. These features include the existing and proposed fuel modification zones within the project site as well as the fuel modification area along the project's frontage (see Figure 4.20-2 in Section 4.20, *Wildfire*, of the RS-Draft EIR). Because the project would provide a sizable area that would be ignition resistant, emulating urbanized areas where wildfire spread can be halted, emergency managers may halt evacuations at the project site at any point to move higher-priority traffic. The project may also serve as a temporary evacuation point for evacuees from other areas, given its design as a fire-resistant zone.

Master Response MR-10 (Passive Park Alternative)

Commenters expressed concerns about the passive park alternative and requested further information about its existence. Analysis of Alternative 5 – Passive Park Alternative is included in RS-Draft EIR Chapter 6, *Alternatives*. Under Alternative 5, the project site would be developed with an approximately 0.23-acre passive park. The formalized parking lot or staging area would be located within the disturbed area adjacent to South Grade Road south of the intersection with Calle De Compadres. The parking area would be graded, as needed, and consist of dirt and/or DG, with an impervious surface for one to two Americans with Disabilities Act (ADA) parking spaces. A split rail fence would be constructed around the perimeter of the parking area. Alternative 5 would include a formalized parking area with access to existing trails through disturbed areas to ensure no vegetation is affected. The Passive Park Alternative would establish the existing 1.1 miles of multi-use trails for public use. No restrooms or similar facilities that would require a higher level of onsite maintenance and ranger presence would be established, but there would be an information kiosk and a bench in a disturbed area at the trail head.

Alternative 5 – Passive Park Alternative would avoid or reduce impacts related to the majority of the resource areas, including aesthetics and visual resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, transportation and circulation, tribal cultural resources, utilities and service systems, and wildfire. Alternative 5 would result in minimal reduced impacts related to hydrology and water quality, land use and planning, population and housing, and public services; and would result in similar impacts related to agriculture and forestry resources and mineral resources. Alternative 5 would potentially result in a greater level of impact related to recreation and would not result in benefits to biological and cultural resources that would be realized through implementation of the project. Alternative 5 would only meet one of the project objectives (#3), because it would still provide for long-term natural and cultural resource management at the project site, albeit at a lower level of benefit compared to the project. Alternative 5 would not achieve any of the other objectives related to

creating a community gathering place, enhancing the quality and life and public health of the community, and accommodating a variety of active and passive recreational uses.

Master Response MR-11 (Public Outreach)

Commenters provided feedback and expressed concern about the level of public outreach. County DPR hosted five public meetings to receive community members' feedback on the design of the project. Notice of these meetings was mailed to residents in the immediate vicinity and posted to the County DPR website and social media channels (Facebook, Twitter, and Instagram). Outreach events were also shared with local media and in various stakeholder meetings. A summary of the public meetings is provided below.

- **Public Meeting #1 on May 15, 2019:** This meeting was a brainstorming session in which attendees were asked to rate potential amenities for the proposed park.
- **Public Meeting #2 on August 29, 2019:** The second meeting reported the community's priorities for amenities based on feedback received at the first meeting. Park concepts were shared, featuring attractions that reflected those preferences. Those who could not attend were provided with a link to an online survey where they could rate options and amenities and provide comments.
- **Public Meeting #3 on September 23, 2020 (virtual):** The third public meeting was held to collect feedback on two specific amenities within the park: the all-wheel and bike skills areas. The contracted design teams shared options for these amenities and the County DPR project team presented information about the project's overarching design. Those who could not attend were provided with a link to an online survey where they could rate options and amenities and provide comments; this survey was specific to the all-wheel and bike skills areas.
- **Public Meeting #4 on January 14, 2021 (virtual):** This meeting was set up to share updates on the overarching park project and final design concept. Some preliminary plans were not yet completed, including environmental processes and traffic studies.
- **Public Meeting #5 on May 17, 2022 (virtual):** This meeting was held to re-engage with the community, introduce new County team members, and provide an update on revisions to the concept plan and environmental analysis for the project originating from public input.

In addition to the public outreach meetings, the County hosted over a dozen stakeholder meetings with groups like Alpine Community Planning Group (CPG) and its Parks' Subcommittee, Preserve Alpine's Heritage, BCLT, Alpine FPD, Eastern Alpine Association, San Diego Mountain Biking Association, and Alpine Union School District. Although a formal CPG recommendation is not required for a public project, the CPG voted in support of the Alpine Park concept plan on April 6, 2021. The CPG provided recommendations to address water use at the baseball field, to coordinate with Alpine FPD and County Fire Authority, and to investigate the feasibility of an all-way stop at park entrances. The CPG voted 11 yes, zero no, one abstention, and three vacant/absent. Feedback collected during these meetings contributed to the park design concept.

On March 8, 2021, County DPR posted a Notice of Preparation (NOP) with the County Clerk in accordance with Section 15082 of the CEQA Guidelines. The NOP was mailed to public agencies, organizations, and other interested individuals to solicit their comments on the scope and content of the environmental analysis. County DPR held a scoping meeting pursuant to Section 15082(c)(1) of the CEQA Guidelines on March 30, 2021. Due to COVID-19 restrictions on gatherings, an in-person

meeting was not possible and instead the EIR scoping meeting was held in the form of a recorded presentation. The County received 33 comment letters during the scoping period for the EIR, which were included in Appendix B of the Draft EIR.

On September 28, 2021, County DPR posted a Notice of Completion and provided public notice of the availability of the Draft EIR. The County received 80 comment letters during the 45-day public comment period from September 30 to November 15, 2021. In addition, the County provided a public notice of the availability on December 16, 2022, of the RS-Draft EIR. The County received 38 comment letters during the 75-day comment period from December 16, 2022, to February 28, 2023. Documents were also made available for review at the County's Parks and Recreation office and at the Alpine Branch Library. No changes to the Draft EIR are needed.

Master Response MR-12 (Parks Master Plan)

Commenters expressed concerns that the project would introduce a regional park into the local community. Draft EIR Section 4.16, *Recreation*, states that the County of San Diego General Plan identifies goals and policies for meeting the recreational needs of local communities. To evaluate the recreational need of the county's communities, the County Park Lands Dedication Ordinance divided San Diego County into 24 Local Park Planning Areas to coincide generally with the community plan boundaries outlined in the County of San Diego General Plan. Within each Local Park Planning Area, the ratio of local or regional parkland per 1,000 residents is calculated to determine whether a community has enough acreage of parkland and recreational facilities.

According to the County of San Diego Parks Master Plan, the County's minimum level of service standard for local parks is 3 acres per 1,000 residents, and 10 acres per 1,000 residents for regional parks (County DPR 2020). However, a goal identified in the County of San Diego General Plan is 10 acres per 1,000 residents for local parks and 15 acres per 1,000 residents for regional parks (County 2011). As of 2019, the Alpine Community Plan Area (CPA) has approximately 1.44 acres of local parkland per 1,000 residents, and no regional parkland. The totals do not include parks that are not owned by the County because although they may meet some of the recreational needs of particular communities, access and use may be restricted.

The County's Parks Master Plan found the Alpine CPA to have a deficit of local parkland and sufficient regional parkland but, because there are no regional parks within the Alpine CPA boundary, the Parks Master Plan determined that park acquisition is the greatest priority for County DPR in the Alpine CPA. The Alpine CPA population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County DPR 2020:53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, this will place greater demand on existing park facilities. The Parks Master Plan found that Alpine does not have sufficient parkland to meet the recreational needs of the community with a substantial shortage of sports fields and other recreational amenities.

Draft EIR Section 4.16, *Recreation*, acknowledges that 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. Places like schools that have fields and recreational courts are only accessible to the public outside of school hours and only when not booked for other school uses. So, while beneficial, these amenities are not wholly public and there are restrictions on access.

The project provides an opportunity to develop a portion of the project site as an active park for local recreational use and to conserve a substantial portion of the property as open space. The proposed 98-acre project site would bring County DPR closer to reaching its park-per-resident goals. The roughly 25 acres within the parcel that are dedicated to local active recreation offer enough space to provide a diverse mix of opportunities, ensuring there are options for residents of all ages, abilities, and interests. Under the project, programs at the park would be established based on recommendations from local residents and according to the many amenities that would exist on site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led yoga or Zumba class. Less-active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. No changes to the Draft EIR are needed.

Master Response MR-13 (Noise and Lighting)

Lighting Impacts

Commenters provided concerns about potential noise and lighting impacts during the construction phases as well as operation of the park. Lighting impacts resulting from the project were analyzed in Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR. The project would include minimal outdoor lighting for security purposes. All permanent exterior security lighting would be installed such that lamps and reflectors would not be visible from beyond the project site. Illumination of the project facility and its immediate vicinity would be minimized with lighting design, location, shielding, and aim.

Lighting for the project would comply with local policies and ordinances, including the County of San Diego Light Pollution Code, County of San Diego General Plan, and Alpine Design Review Guidelines. The lighting plan would also be consistent with Alpine Community Plan Policy/ Recommendation 25: Support standards for strict controls over light pollution to preserve the dark night sky characteristics of Alpine.

However, because the project would introduce numerous new lighting sources to an area that does not have any sources of light, it could result in an adverse effect on nighttime views. Introducing any sources of light could result in a substantial change to the project site because the existing conditions are dark nighttime views with no lighting on site and very little light spillover from adjacent offsite sources (Impact-AES-3). With implementation of **MM-AES-3: Turn Off Outdoor Lighting 1 Hour After Closing**, Impact-AES-3 would be reduced to less-than-significant levels because requiring the outdoor lighting to be turned off 1 hour after closing or requiring motion-sensor lighting would remove the sources of nighttime lighting, and the project would not adversely affect nighttime views. Overall, the project would comply with guidelines and requirements for lighting that require minimizing light pollution to the greatest extent possible and being sensitive to ecological needs. No changes to the Draft EIR are needed.

Noise Impacts

Noise impacts were analyzed in Section 4.13, *Noise and Vibration*, of the Draft EIR. Noise measurements were conducted at five total (three short-term and two long-term) sites around the project area. The ambient noise levels measured throughout the project site are included in the Draft EIR in Table 4.13-2. While construction noise would be perceived in the surrounding area, mitigation measures would be implemented to reduce impacts, construction activities would be

confined to daytime hours, and the duration of construction work would be temporary. As discussed in Section 4.13.5.3, *Project Impacts and Mitigation Measures*, and identified in Tables 4.13-8 and 4.13-10, construction of the proposed sewer line would generally exceed the 75 A-weighted decibel (dBA) 8-hour equivalent noise level (L_{eq}) as identified by the County as the noise threshold for construction. As such, a significant impact was identified (Impact-NOI-1) and **MM-NOI-1: Install Temporary Sound Barriers** would be implemented to reduce construction noise. **MM-NOI-1** requires the applicant (i.e., contractor) to "*Install Temporary Sound Barriers*. Prior to and during construction activities for the proposed sewer line extension, the construction contractor shall install temporary barriers (i.e., soundwalls) that would break the line of sight (a minimum height of 10 feet) between construction equipment and nearby noise-sensitive receivers. These soundwalls shall be installed at any location where construction is located within 100 feet of the property line of an occupied residence or other noise-sensitive land use, such as schools." With implementation of **MM-NOI-1** and the temporary sound barrier, impacts during construction of the sewer line would be less than less significant.

Regarding operational impacts, existing similar park activities (e.g., soccer field and skate park use) were used to represent noise levels at the project. The methodology for analyzing operational noise as it relates to traffic and project operations, including the all-wheel park, are discussed on pages 4.13-12 and 4.13-13 of the Draft EIR. The operational traffic noise analysis used the Federal Highway Administration Traffic Noise Model look-up tables and expected traffic volumes to analyze potential traffic noise impacts and *SoundPLAN*, which is a three-dimensional model, to calculate operational noise anticipated from the project. The results of the analysis (presented in Tables 4.13-11 and 4.13-12) indicate that expected traffic-related noise is calculated to increase by no more than 1 decibel (dB) and project-related operational noise was calculated to increase the ambient noise level by no more than 3 dB. These projected noise increases would comply with applicable thresholds laid out in the San Diego County Code of Regulatory Ordinances. Even though expected impacts would not be significant, the following mitigation measures would nonetheless be employed to further reduce noise transmission. **MM-NOI-2: Enforce Standard Rules and Regulations** identifies that the County will enforce quiet hours, which are between the hours of 10 p.m. and 7 a.m., and **MM-NOI-3: Set Operational Limits and Restrictions** will prohibit the use of a public address (PA) system unless it has been approved by a specific permit.

A few commenters also noted confusion regarding the park hours and the enforced quiet hours. Daily park hours are from sunrise to sunset. However, with a specific permit (e.g., conditional use permit, special event permit), events may occur at the park and may end at 10 p.m. and may include a PA system. The project would not include the use of a PA system otherwise as stated in **MM-NOI-3**. **MM-NOI-2** would ensure that quiet hours are enforced from 10 p.m. to 7 a.m. No changes to the Draft EIR are needed.

Master Response MR-14 (Geology and Soils)

Commenters expressed concerns about potential impacts on resources found in the area during construction. Please refer to Section 4.7, *Geology and Soils*, of the Draft EIR for an overview of the existing geologic conditions. Construction activities of the project are expected to include grading, digging, and excavation to prepare the site and build the recreational facilities, parking lot, and infrastructure; as well as building the berm along the southeastern and southern boundaries of the site. Portions of the project site are underlain by geologic units with moderate paleontological sensitivity. Ground-disturbing construction activities in the southern and western portions of the project site would be subject to paleontological and geologic resource sensitivity screening prior to

commencement of construction. The resource sensitivity screening will determine which ground-disturbing activities would be deep enough to encounter previously undisturbed deposits of the Lusardi Formation. Ground-disturbing construction activities that extend deep enough to encounter previously undisturbed deposits of the Lusardi Formation could result in impacts on paleontological resources (Impact-GEO-1).

MM-GEO-1: Implement a Paleontological Resource Mitigation Program would reduce the potential impacts during construction activities. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological/Archaeological Monitor during ground-disturbing activities. **MM-GEO-1** would prevent impacts on paleontological resources, and if fossils are unexpectedly discovered, would require the proper handling and recording of such fossils. With implementation of **MM-GEO-1**, impacts would be less than significant.

A Geotechnical Evaluation was also provided by Ninyo & Moore (Appendix F of the Draft EIR). The Geotechnical Evaluation includes review of pertinent background data and performance of a geologic reconnaissance and subsurface exploration, and provides an engineering analysis regarding the proposed construction. Also presented in the Geotechnical Evaluation are results of Ninyo & Moore's background review, field exploration, and geotechnical laboratory testing. The Geotechnical Evaluation report describes the presence of expansive clay soils on the site and identifies geologic features, particularly the Lusardi Formation within the geology of the site vicinity, although not encountered during the subsurface exploration. Also included are conclusions regarding the geotechnical conditions at the project site and recommendations for the design and construction aspects of the project. The Geotechnical Evaluation also includes various recommendations for earthwork, seismic design considerations, building foundations, interior slabs-on-grade, site retaining walls, preliminary flexible pavement designs, preliminary gravel road designs, exterior pedestrian concrete flatwork, and stormwater BMPs for the design and construction of the project.

The conclusions and recommendations presented in the Geotechnical Evaluation are based on analysis of observed site conditions. If conditions are found to vary from those described in the Geotechnical Evaluation, Ninyo & Moore would be notified, and additional recommendations will be provided upon request. It is also noted Ninyo & Moore would review the final project drawings and specifications prior to the commencement of construction and would perform the needed observation and testing services during construction operations. The proposed improvements would be constructed with the requirements of the applicable governing agencies and performed by qualified subcontractors utilizing appropriate techniques and construction materials. Additionally, the project design team's landscape architect would be consulted regarding the effects of the expansive clay soils on landscaping and irrigation elements. Additional drainage considerations will be addressed by the project civil engineer during construction.

Based on a review of the referenced background data, subsurface exploration, and geotechnical laboratory testing, the Geotechnical Evaluation noted that construction of the project and improvements is feasible from a geotechnical standpoint. For additional information, refer to Section 4.7, *Geology and Soils*, of the Draft EIR and the Geotechnical Evaluation (Appendix F of the Draft EIR). No changes to the Draft EIR are needed.

Master Response MR-15 (Water and Wastewater)

Commenters expressed concerns about potential impacts and problems with water and wastewater resources. This response has been drafted to address those concerns.

Water Impacts

Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the CEQA analysis, particularly any impacts for both water and sewer services. Impacts and mitigation measures are discussed, as well as the water supply and service boundary of the Padre Dam Municipal Water District (PDMWD). The entirety of PDMWD's potable water supply is imported through the San Diego County Water Authority (SDCWA).

The County coordinated with PDMWD regarding the project and has a water availability letter on file. According to PDMWD, a water supply assessment will be required for the project to verify the system can accommodate the proposed development and/or identify needed improvements that would allow the water system to supply the project.

Future water demand and supply projections are required to be updated every 5 years with the adoption of an Urban Water Management Plan (UWMP). PDMWD's 2015 UWMP projects the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including SDCWA, which provided imported water availability and regional water demands and conservation, and SANDAG, which provided the most recent demographic projections (2050 Regional Growth Forecast Update Series 13). Table 4.19-1 in the Draft EIR shows PDMWD's existing and projected water demand and estimated supply between 2020 and 2040 under normal weather conditions (PDMWD 2016). PDMWD's UWMP is updated every 5 years, at which time the projected supply and demand of potable water resources are reevaluated for the reasonably foreseeable future (i.e., 20-year planning period).

Mitigation measure **MM-UTIL-1** requires the completion of a water study to assess the capacity of the existing water infrastructure. If new or expanded water facilities would need to occur, the County shall analyze potential environmental effects of the improvement in accordance with CEQA.

Mitigation measure **MM-UTIL-2** requires the County to confirm water supply availability for development of the project prior to issuance of the building permit. No changes to the Draft EIR are needed.

County DPR received a water availability letter from PDMWD that confirmed water demands associated with the project would be met. However, a water supply assessment would still be required to conclude PDMWD would be able to provide adequate water supplies for operation of the proposed park during the life of the park. This requirement was included as **MM-UTIL-2: Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits** in Section 4.19, *Utilities and Service Systems*, of the Draft EIR.

Wastewater Impacts

The Alpine Sewer Service Area (SSA), formerly the Alpine Sanitation District, serves the community of Alpine. Based upon a County Bureau of Sanitation action in 2011, the Alpine SSA was officially reorganized and annexed into the Spring Valley Sanitation District, which was then renamed the San Diego County Sanitation District (SDCSD). SDCSD provides sewer service to approximately 36,000 customers in unincorporated areas of the county. The proposed sewer line option would connect

with existing sewer lines within the SDCSD service area and would follow proper sanitation and waste removal requirements. The additional sewage to be treated by SDCSD is within the available capacity; no adverse effects are expected either with regard to the treatment plant or nearby residents.

As stated in the Draft EIR, an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the project site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. The existing sewer line is served by SDCSD. An onsite sewage treatment system is the second option for disposal of sewage associated with the project. The system would be in the northern portion of the project site, north of the equestrian staging area. Two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site with a capacity of 1,500 gallons and the other a main tank near the restroom in the northern portion of the project site with a capacity of 15,000 gallons. It is anticipated that the proposed septic system would have a capacity of 5,000 gallons per day.

The Point Loma Wastewater Treatment Plant has a daily wastewater treatment capacity of 240 million gallons per day (mgd) and a peak wet-weather capacity of 432 mgd. In 2015, the measured wastewater collected was 136.2 mgd, which leaves an available capacity of approximately 104 mgd if this trend continues. The additional generation of 8,630 gallons per day of wastewater associated with the project represents 0.000062 percent of the Point Loma Wastewater Treatment Plant's remaining annual treatment capacity, which is an insubstantial amount relative to the remaining treatment capacity. Additionally, because SANDAG Series 14 projections are smaller than Series 13 projections, available capacity is expected to be maintained.

A majority of the Alpine community (98 percent) is served by septic lines. The most common type of septic system found in San Diego County consists of a septic tank connected to leach lines. For the septic system option, two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site with a capacity of 1,500 gallons and a main tank near the restroom in the northern portion of the project site with a capacity of 15,000 gallons. It is anticipated that the proposed septic system option would have a capacity of 5,000 gallons per day. Implementation of an onsite sewer treatment system would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. All sewage would be treated by the onsite sewer treatment system. No changes to the Draft EIR are needed.

3.3.2 Responses to Specific Comments

This section responds to those comments received that specifically pertain to the scope and content of the Draft EIR. The written comment letters received by the County are referenced at the beginning of each response and individual comments are numbered.

Where comments have prompted changes to text in the Draft EIR, these changes have been compiled in Chapter 3, *Clarifications and Modifications to the Draft EIR*.

Comment Letter A1: California Department of Fish and Wildlife (CDFW), November 15, 2021

Comment#	Comment Text	Response
A1-1	The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from the County of San Diego (County) Department of Parks and Recreation (DPR) (Lead Agency) for the Alpine Park Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. Thank you for the opportunity to provide comments and recommendations regarding the activities involved in the Alpine Park Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.	The County appreciates CDFW for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
A1-2	**CDFW Role** CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & G. Code, §	This is an introductory comment about CDFW's background information, including its past actions and jurisdiction within Wright's Field, that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	2050) of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code. CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The County participates in the NCCP program by implementing its approved Subarea Plan (SAP) under the San Diego County Multiple Species Conservation Plan (MSCP). The Project site is located with the boundaries of the County's approved MSCP covering southwestern San Diego County. Noteworthy is that the Wright's Field area was added to the Pre-Approved Mitigation Area (PAMA) of the County's MSCP SAP due to its very high biological resource values. More specifically, the heavy clay soils, extensive network of native grasslands with scattered vernal pools, and the presence of a number of highly sensitive plant and animal species make Wright's Field a unique area within the MSCP subregion. Although the MSCP is permitted under both the California NCCP and federal Habitat Conservation Plan (HCP) programs, the MSCP did not provide take coverage for the Quino checkerspot butterfly (*Euphydryas editha quino*; Quino), a federal endangered species that has been identified onsite. Impacts to Quino are therefore being addressed by the U.S. Fish and Wildlife Service (USFWS) under a separate HCP.	
A1-3	**PROJECT DESCRIPTION AND SUMMARY** **Proponent**: San Diego County Department of Parks and Recreation **Objective**: The Project site is in the area covered by the Alpine Community plan. The Project site is currently zoned as Limited Agricultural Use (A70) and Open Space (S80). The site is subject to the General Plan Rural Lands Regional Category, with an Open Space-Conservation land use designation in the western portion of the property and a Semi-Rural Residential land use designation in the eastern portion. The Project site encompasses 96.6 acres of undeveloped land. Twenty-five acres will be	This is an introductory comment summarizing the project description that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	developed and turned into an active park and the remaining 71.6 acres that will not be developed will be designated as open space and managed as part of the MSCP Preserve. The 25-acre active park will include: multi-use turf areas, baseball field, all-wheel area, bike skills area, recreational courts (i.e., basketball, pickleball, game table plaza), fitness stations, leash-free dog area, restroom facilities, administrative facility/ranger station, equestrian staging with a corral, nature play area, community garden, volunteer pad, picnic areas with shade structures, picnic tables, game table plaza, and trails. Included in the Project boundary will be a parking area with 250-275 single vehicle spaces. There will be two entrances to the parking area located on South Grade Road. The Project site will be open to the public from sunrise to sunset. Dogs are allowed on leashes in the Project boundaries and off-leash in the designated dog area. As stated above, the 71.6 acres that will not be developed will be called the Alpine Park Preserve (Preserve) and monitored and managed by the County. This management will include maintenance of one mile of existing trails and closure of informal use trails. An HCP addressing impacts to Quino checkerspot butterfly will include restoration and habitat enhancement for the species. **Location**: The Project site is in eastern San Diego County, one mile south of Interstate 8, and approximately one mile south of the center of the town of Alpine. Alpine is an unincorporated community in the eastern portion of the County and is approximately 25 miles east of downtown San Diego. The Project site is north of South Grade Road, east of Tavern Road, and adjacent to the Backcountry Land Trust's (BCLT) Wright's Field Preserve. Residential and rural communities surround the 96.6-acre site. **Timeframe**: There is no official start date, but Project construction will take 16 months to complete.	
A1-4	**I. Environmental Setting, Mitigation Measures, and Related Impact Shortcoming**	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to Master Response (MR)-1 (Western Spadefoot Recirculation) for additional details. Western spadefoot surveys and special-status bat surveys were conducted in 2022 to

Comment#	Comment Text	Response
	Comment #1: Presence of Western Spadefoot (*Spea hammondii*) Egg Mass **Issue**: In the Biological Resources Report (BRR), in internal Appendix B, Table 2 notes the presence of western spadefoot eggs in an onsite road rut (AP-007) during fairy shrimp protocol surveys. Western spadefoot was not addressed in the DEIR as being present on the Project site. Page 4.4-3 in the DEIR identifies special-status species that were observed and/or have the potential to occur but does not mention western spadefoot in this section. The DEIR also states on page 4.4-30 that it would not have an effect on state or federal wetlands, which is true in the context of wetlands. However, in the impact discussion it states, "No wetland features or aquatic resources were found within the BSA during any field surveys." Although there may not be jurisdictional wetland features onsite, the soils onsite have the ability to hold water, allowing for an ephemeral species such as the western spadefoot to use the site for breeding and presumably for estivation and foraging.	support the additional analysis. In addition, vegetation mapping was updated in the summer of 2022. The County will mitigate for impacts on one western spadefoot breeding pool by creating three permanent basins (a minimum of 471 square feet total) to support western spadefoot breeding.
A1-5	**Specific Impact**: Direct impacts to western spadefoot could result from Project construction and activities (e.g., equipment staging, mobilization, and grading); ground disturbance; vegetation clearing; and trampling or crushing from construction equipment, vehicles, and foot traffic. Indirect impacts could result from temporary or permanent loss of suitable nonbreeding habitat and breeding habitat. **Why Impacts Would Occur:** Western spadefoots are burrowing anurans that breed in ephemeral pools, but the majority of their life is spent underground in adjacent terrestrial habitat. In a recent study, inland populations of western spadefoot showed dispersal up to 187 meters from a breeding pool (Halstead et al. 2021). This means that there is a high potential for adult western spadefoots on or near the Project site. Without appropriate species-specific avoidance measures, biological construction monitoring may be ineffective for detecting western spadefoot or other Species of Special Concern (SSC). This may result in trampling or crushing of western spadefoot individuals or egg masses. Demolition and paving	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details.

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	after false negative conclusions may trap wildlife hiding under refugia and burrows.	
A1-6	**Evidence Impacts Would Be Significant**: Western spadefoot is a candidate species under the federal Endangered Species Act (ESA), and a California Species of Special Concern (SSC). Western spadefoot is not a covered species in the County's MSCP SAP. Impacts to special-status species are discussed in section 4.4 in the DEIR but do not include western spadefoot. The DEIR states that "MM-BIO-1 through MM-BIO-5 would reduce the Project's impacts on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS, to less-than significant level." CDFW appreciates the intention behind these mitigation measures but is concerned that the measures do not provide enough specificity to avoid or minimize impacts to special status species. CEQA provides protection not only for California Endangered Species Act (CESA)- and ESA-listed species, but for any species including, but not limited to, SSC. CDFW considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details.
A1-7	**Recommended Potentially Feasible Mitigation Measure** **Mitigation Measure #1: Species-specific Surveys, Habitat Creation, Post-relocation Monitoring** - Prior to the start of the Project, ground disturbance, construction, or site preparation activities, the applicant shall retain the services of a qualified biologist to conduct pre-construction surveys for western spadefoot toad within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during a time of year when the species could be detected (*e.g.*, the presence of rain pools). If western spadefoot toad or additional egg masses are identified on the Project site, the following measures will be implemented.	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details. Mitigation for significant impacts has been provided. Please note that surveys for western spadefoot were conducted in 2022. No western spadefoot individuals were observed in the proposed park footprint and no breeding activities (egg masses, larvae) were observed in any of the seasonally- inundated basins on the County's property. However, mitigation will be provided for impacts on the one basin (AP-7) in which breeding was attempted in 2019. See the RS-Draft EIR for mitigation language for **MM-BIO-4: Western Spadefoot**.

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A1-8	(1) Under the direct supervision of the qualified biologist, western spadefoot toad breeding habitat shall be created within suitable natural sites outside the developed area plus a minimum 50-foot buffer from the forthcoming development; a minimum 100-foot buffer is recommended if it can be accommodated by the Project design. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a minimum of 2:1 ratio. CDFW recommends that two pools be created at disparate locations to off-set the loss of the existing breeding pool. The actual relocation sites design, and locations shall be approved by the Wildlife Agencies. The locations shall be in suitable habitat as far away as feasible from any recreation activities. The relocation basins shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (*e.g.*, fish, bullfrogs, and crayfish) cannot become established. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s) as feasible. No site preparation or construction activities shall be permitted in the vicinity of the currently occupied pool until the design and construction of the pool habitat in preserved areas of the site has been completed and all western spadefoot toad adults, tadpoles, and egg masses detected are moved to the created pool habitat.	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4: Western Spadefoot** for additional details. Mitigation for significant impacts has been provided. The County has implemented several suggestions by CDFW into **MM-BIO-4**, including an agreement to construct three pools equaling three times the area of the affected basin as mitigation; the provision to design basins to support standing water for only several weeks; a provision requiring a minimum 100-foot distance between constructed basins and the western edge of the proposed park; a requirement that the terrestrial habitat surrounding the proposed relocation site be as similar in type, aspect, and density to the location of the existing pool(s), as feasible; and a requirement that the new basins be situated within 262 meters of the core breeding population on Wright's Field to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins.
A1-9	(2) Based on appropriate rainfall and temperatures, generally between the months of February and April, the biologist shall conduct pre-construction surveys in all appropriate vegetation communities within the development envelope. Surveys will include evaluation of all previously documented occupied areas and a reconnaissance-level survey of the remaining natural areas of the site. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created relocation basins described above.	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details. Focused surveys were conducted in winter 2021/spring 2022. There are no specific USFWS-, CDFW-, or County-required intervals for updates to the presence/absence surveys. **MM-BIO-4** describes that western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint.
A1-10	(3) The qualified biologist shall monitor the relocation site for five years, involving annual monitoring during and immediately following peak breeding season such that surveys can be conducted for adults as well as for egg masses and larval and	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details.

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	post- larval toads. Further, survey data will be provided to CDFW by the monitoring biologist following each monitoring period and a written report summarizing the monitoring results will be provided to CDFW at the end of the monitoring effort. Success criteria for the monitoring program shall include verifiable evidence of toad reproduction at the relocation site.	See the RS-Draft EIR for **MM-BIO-4: Western Spadefoot**. Monitoring of the constructed basins will occur following completion of the basins, as described in the proposed mitigation measure. The success criteria included in the mitigation measure also reflect the stipulation addressed in this comment.
A1-11	**Comment #2: Impacts to Native Grassland Habitat** **Issue**: The DEIR proposed 11.73 acres of offsite mitigation for impacts to native needlegrass grassland but does not provide the location of where this mitigation will take place. The Project needs to meet compensatory mitigation requirements of the MSCP, which require impacts to be mitigated at a 2:1 ratio, assuming that the mitigation will occur within the PAMA of the County's MSCP SAP. This is a relatively large amount of native grassland requiring replacement and may be very difficult to accomplish.	CDFW noted the need for the County to provide in-kind mitigation for impacts on native grasslands. Mitigation for native grasslands has been revised in the RS-Draft EIR, which included consultation between the County and the wildlife agencies (CDFW and USFWS) while drafting the mitigation measure. See MR-3 (Native Grassland Impacts) for additional details. See the RS-Draft EIR for **MM-BIO-10: Native Grassland Mitigation**.
A1-12	**Specific impact:** Valley needlegrass grassland is at the central and southern area of the BSA and it represents a large contiguous vegetation community that is unique in this area. Without an offsite mitigation site, the Project would result in permanent loss of native needlegrass grassland. This vegetation community is known to provide habitat for special-status plant and wildlife species including Quino, and it is considered prime foraging habitat for several species of raptors. **Why Impacts Would Occur:** Native grasslands provide habitat for special-status plants and wildlife species. Impacts to special-status plants and wildlife species may occur through habitat loss or modification, resulting in reduced reproductive capacity, population declines, or local extirpation of a sensitive or special-status plant or wildlife species.	Please see the response to comment A1-11 and MR-3 (Native Grassland Impacts).
A1-13	**Evidence Impacts Would Be Significant:** The DEIR states that valley needlegrass grassland is the most common vegetation community in the Biological Survey Area (BSA), compromising 22.1 acres of the total BSA. In the BSA there is also disturbed valley needlegrass grassland (0.8 acre) and nonnative grassland (9.1 acres). Valley needlegrass and disturbed valley needlegrass	Please see the response to comment A1-11 and MR-3 (Native Grassland Impacts).

Comment#	Comment Text	Response
	habitat are Tier I communities under the County's MSCP SAP. The DEIR indicates that County DPR will provide compensatory mitigation for sensitive vegetation communities within the open space and/or within offsite locations. Table 4.4-4 states that 27.73 acres is required to mitigate for impacts to native grassland (Tier I) communities, with 16 acres of onsite mitigation and 11.73 acres of offsite mitigation. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or (USFWS).	
A1-14	**Recommendation #1** CDFW recommends the County DPR retain a suitable offsite mitigation location for impacts to native grassland communities. Once the site has been chosen, it will need to be approved by CDFW and USFWS (Wildlife Agencies) prior to commencement of Project activities.	Please see the response to comment A1-11 and MR-3 (Native Grassland Impacts).
A1-15	**II. Additional Comments and Recommendations** **Comment #3: Monitoring Bat Boxes** CDFW appreciates the MM-BIO-5 that states County DPR will work with a bat expert to design and install bat boxes prior to removal activities. We also appreciate the level of monitoring that is proposed after the bat boxes are installed. CDFW requests to be notified of any ongoing coordination and that the monitoring information be included in annual reports and/or be included in the County's annual report for the MSCP.	Mitigation measure **MM-BIO-5** (now **MM-BIO-7**) has been modified to note that monitoring efforts on pallid bat boxes will be included in the County's annual report for the MSCP and that the annual monitoring reports will be submitted to CDFW.
A1-16	**Comment #4: Alternative Project Design** CDFW acknowledges that the County could construct an active use park and be consistent with the requirements of the MSCP and appreciates the coordination that has occurred with County Parks to minimize impacts from an active park project. CDFW nonetheless recommends that a design for a more "passive park" be further considered as an alternative because of the	Alternative 5 – Passive Park Alternative has been analyzed in RS-Draft EIR Chapter 6, *Alternatives*. Please refer to MR-10 (Passive Park Alternative) for further details.

Comment#	Comment Text	Response
	presence of highly sensitive habitats (clay soils, native grassland, oak woodland) and species on and/or adjacent to the conserved areas of Wright's Field. In Section 6 of the DEIR, four parks were proposed as alternatives. Of these four parks, Alternative 4, Reduced Project Alternative, proposes a reduced active park acreage of 20 acres and 76 acres of open space. CDFW appreciates that this alternative is included in the DEIR, but Alternative 4 would still include active use features such as multi-use fields, baseball field, basketball and pickleball courts with the estimated daily capacity of up to 500 visitors. The impacts from these activities include lighting, noise, and other human disturbance. **Recommendation #2** CDFW recommends adding an alternative for a fully passive park design. This design would include the passive-use elements that are included in the Alternative 4 park design but would eliminate the active-use features. A passive park would allow the County to meet some of the recreational objectives for the Alpine community, provide an open space preserve and minimize impacts to the habitat encompassing the Wright's Field conservation area. Project alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources. A project alternative should be considered even if an alternative would impede to some degree the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).	
A1-17	**ENVIRONMENTAL DATA** CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to	This comment regarding the California Natural Diversity Database (CNDDB) is acknowledged. All procedures and requirements pursuant to the CNDDB will be adhered to as the project moves forward. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.	
A1-18	**ENVIRONMENTAL DOCUMENT FILING FEES** The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)	The County acknowledges that an assessment of filing fees associated with impacts on fish and/or wildlife and payable upon filing of the Notice of Determination by the lead agency is required for the underlying project approval to be operative, vested, and final. No changes to the Draft EIR are needed. The CDFW fees are acknowledged. No further response is required and no changes to the Draft EIR are needed.
A1-19	**CONCLUSION** CDFW appreciates the opportunity to comment on the DEIR to assist the San Diego County Department of Parks and Recreation in identifying and mitigating Project impacts on biological resources and for consistency with the MSCP. Questions regarding this letter or further coordination should be directed to Emily Gray, Environmental Scientist at Emily.Gray@wildlife.ca.gov.	The County appreciates CDFW for submitting comments on the Draft EIR. This comment and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No changes to the Draft EIR are needed.

Comment Letter A2: San Diego Water Board 1, September 30, 2021

Comment #	Comment Text	Response
A2-1	Your email has been received and will be distributed to the appropriate San Diego Water Board's staff.	The County appreciates the San Diego Water Board for submitting comments on the Draft EIR. This comment will be shared with the County of San Diego Board of Supervisors and the project team. No further response is required and no changes to the Draft EIR are needed.

Comment Letter A3: San Diego Water Board 2, October 15, 2021

Comment#	Comment Text	Response
A3-1	Your email has been received and will be distributed to the appropriate San Diego Water Board's staff.	The County appreciates the San Diego Water Board for submitting comments on the Draft EIR. This comment will be shared with the County of San Diego Board of Supervisors and the project team. No further response is required and no changes to the Draft EIR are needed.

Comment Letter A4: California Department of Fish and Wildlife (CDFW), February 27, 2023

Comment#	Comment Text	Response
A4-1	The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of the Recirculated Draft Environmental Impact Report (DEIR) from the County of San Diego (County) Department of Parks and Recreation (DPR) for the Alpine Park Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[2] Thank you for an opportunity to provide comments and recommendations regarding the activities involved in the Alpine Park Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. **CDFW Role** CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law	The County appreciates CDFW for submitting comments on the RS-Draft EIR. CDFW's comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This is an introductory comment that provides background information on CDFW's role and summarizes the project description in the Draft EIR. No further response is required. No changes to the RS-Draft EIR are needed.

[2] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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	to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources. CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & G. Code, § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code. CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The County participates in the NCCP program by implementing its approved Subarea Plan (SAP) under the San Diego Subregional Multiple Species Conservation Plan (MSCP). The Project site is located with the boundaries of the County's approved MSCP SAP covering southwestern San Diego County. Noteworthy is that the Wright's Field area was added to the Pre-Approved Mitigation Area (PAMA) of the County's MSCP SAP due to its very high biological resource values. More specifically, the heavy clay soils, extensive network of native grasslands with scattered vernal pools, and the presence of a number of highly sensitive plant and animal species make Wright's Field a unique area within the MSCP subregion. Also noteworthy is that although the MSCP is permitted under both the California NCCP and federal Habitat Conservation Plan (HCP) programs, the MSCP did not provide take coverage for the Quino checkerspot butterfly (*Euphydryas editha quino*; Quino), a federal endangered species that has been identified onsite. Impacts to Quino are therefore being addressed by the U.S. Fish and Wildlife Service (USFWS) under a	

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	separate HCP. Quino was also previously petitioned to the Fish and Game Commission for listing as a State endangered species; however, no decision has been made by the Commission at this point in time. **PROJECT DESCRIPTION AND SUMMARY** **Proponent**: San Diego County Department of Parks and Recreation **Objective**: The Project site is in the area covered by the Alpine Community plan. The Project site is currently zoned as Limited Agricultural Use (A70) and Open Space (S80). The site is subject to the General Plan Rural Lands Regional Category, with an Open Space-Conservation land use designation in the western portion of the property and a Semi-Rural Residential land use designation in the eastern portion. The Project site encompasses 96.6 acres of undeveloped land. Twenty-five acres will be developed and turned into an active park and the remaining 71.6 acres that will not be developed will be designated as open space and managed as part of the MSCP Preserve. The 71.6 acres that will not be developed will be called the Alpine Park Preserve (Preserve) and monitored and managed by the County. This management will include maintenance of one mile of existing trails and closure of informal use trails. An HCP addressing impacts to Quino checkerspot butterfly will include restoration and habitat enhancement for the species. The DEIR is being recirculated by the County based on revisions and modifications made to certain chapters or portions of the document. The recirculated sections include changes to Section 4.4, Biological Resources; Section 4.9, Hazards and Hazardous Materials; Section 4.20, Wildfire; Chapter 6, Alternatives; and associated technical appendices. **Location**: The Project site is in eastern San Diego County, one mile south of Interstate 8, and approximately one mile south of the center of the town of Alpine. Alpine is an unincorporated community in the eastern portion of the County and is approximately 25 miles east of downtown San Diego. The Project site is north of South Grade Road, east of Tavern Road, and adjacent to the Backcountry Land Trust's (BCLT) Wright's	

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	Field Preserve. Residential and rural communities surround the 96.6-acre site. **Timeframe**: There is no official start date, but Project construction will take 16 months to complete.	
A4-2	CDFW offers the following comments and recommendations to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW's comments are also intended to assist the County Parks Department to ensure the project meets the conditions of the County MSCP SAP. CDFW appreciates the ongoing communication regarding the project, as well as the opportunity to provide input during the monthly coordination meetings with the County. We also appreciate the County addressing our previous comments that were made in our November 15, 2021, letter, specifically our comments regarding western spadefoot (*Spea hammondii*) mitigation measures. The following comments address new impacts that were included in the Recirculated Biological Resources section.	This is an introductory comment summarizing the intent of CDFW's comments and recommendations that precedes specific comments. No further response is required and no changes to the RS-Draft EIR are needed.
A4-3	1. Additional Fire Fuel Reduction Zone in the Proposed Preserve: During a monthly coordination meeting (August 11, 2022), the County discussed that fire fuel clearance is proposed within 100 feet of the volunteer parking pad in the northern portion of the active park. This new fuel reduction area would encroach into the proposed Alpine Park Preserve. Per the Fire and Emergency Operational Assessment (FEOA), the location of the pad would result in the need for a Zone A and Zone B fire fuel modification zone. Zone A (30 feet) includes clearing of vegetation and would result in "landscape replacement". Zone B (100 feet) includes clearing vegetation at least 75 percent to reduce the fire line intensity, which would be achieved by removing shrubs by a minimum of 50 percent, and grass/herb fuels by a minimum of 80 percent. During that meeting, the Wildlife Agencies (jointly, CDFW and the U.S. Fish and Wildlife Service (USFWS)) expressed concern that fuel modification would occur within the Preserve, impacting native habitat, and	The County redesigned the volunteer pad/dwelling to avoid fuel modification within the Alpine Park Preserve; the County will include a detailed Fuel Modification Plan in the final RMP. No changes to the RS-Draft EIR are needed.

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	asked the County to consider moving the volunteer pad/dwelling to a central location within the park boundaries. Section 7.2 of the Biological Resources Report (BRR) states that the County re- designed the site plan in the fall 2022 to move the volunteer parking pad from its previous location which was 12 feet from the edge of the proposed Preserve. CDFW appreciates the Recirculated DEIR including our concerns and taking the Wildlife Agencies' recommendation to move the volunteer parking pad/dwelling to the interior of the Project footprint to avoid any fuel medication within the Preserve. CDFW also recommends that a detailed Fuel Modification Plan (FMP) be included in the final Resource Management Plan (RMP).	
A4-4	2. Native Grassland Mitigation: CDFW appreciates the efforts by the County to mitigate the impacts to native grassland with 17.48 acres of onsite preservation, 4.84 acres of restoration, as well as mitigating offsite with 7.41 acres of restoration of non-native grassland on Wright's Field Preserve. As stated in the BRR, all restoration will be conducted in accordance with the Habitat and Restoration and Enhancement Plan (HREP) to be approved by the Wildlife Agencies. The HREP will include success criteria, and if success criteria and restoration goals are not met, the County will implement adaptive management measures approved by the Wildlife Agencies. As mentioned in our meetings (May 12, 2022 and June 9, 2022), if success criteria/restoration goals are not met, the County should mitigate for the impacts to native grassland with in-kind vegetation. CDFW would not likely agree to out-of-kind mitigation for the offsite restoration on Wright's Field and if the restoration were to fail, the County would need to coordinate with the Wildlife Agencies on next steps going forward.	Please see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation**. The County agrees that native grassland restoration will be conducted in accordance with a Wildlife Agency-approved Habitat Restoration and Enhancement Plan that will include success criteria; if success criteria and restoration goals are not met, the County will implement adaptive management measures approved by the wildlife agencies. Should the restoration fail, the County would coordinate with the wildlife agencies on next steps. No changes to the RS-Draft EIR are needed.
A4-5	**ENVIRONMENTAL DATA** CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project	CDFW's comment regarding the CNDDB is acknowledged. All procedures and requirements pursuant to the CNDDB will be adhered to as the project moves forward. No changes to the RS-Draft EIR are needed.

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	surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.	
A4-6	**FILING FEES** The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)	The County acknowledges that an assessment of filing fees associated with impacts on fish and/or wildlife and payable upon filing of the Notice of Determination by the lead agency is required for the underlying project approval to be operative, vested, and final. No changes to the RS-Draft EIR are needed.
A4-7	**CONCLUSION** CDFW appreciates the opportunity to comment on the Recirculated DEIR to assist the San Diego County Department of Parks and Recreation in identifying and mitigating Project impacts on biological resources and for consistency with the MSCP. Questions regarding this letter or further coordination should be directed to Emily Gray, Environmental Scientist, at Emily.Gray@wildlife.ca.gov.	The County appreciates CDFW for submitting comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter A5: San Diego Regional Water Quality Control Board, December 16, 2022

Comment#	Comment Text	Response
A5-1	Your email has been received and will be distributed to the appropriate San Diego Water Board's staff.	The County appreciates the San Diego Regional Water Quality Control Water Board for submitting comments on the RS-Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR

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		for the project. No further response is required. No changes to the RS-Draft EIR are needed.

Comment Letter O1: San Diego Audubon Society, November 9, 2021

Comment#	Comment Text	Response
O1-1	Thank you for the opportunity to comment on the Alpine County Park Project DEIR. The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. Our work has included invasive removal and revegetation events, training community scientists, advocating for developments and park management, educating school children about the importance of natural habitats, and many other projects. Over the years we have engaged with thousands of volunteers in carrying out these goals. We provide the following comments for consideration to the DEIR.	The County appreciates the San Diego Audubon Society for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This is an introductory comment about the organization's background that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.
O1-2	The main issues in the DEIR this letter will address are the impacts on biological resources within the Alpine County Park Project (Project) and by extension into Wright's Field Preserve (WFP). This includes the trail system design and addition of 250+ park visitors parking spaces. Section 2.4 Existing Conditions states that the project site is adjacent to Wright's Field Preserve, which is managed by BCLT as part of the Multiple Species Conservation Program (MSCP) of the County of San Diego.	This is an introductory comment about the items to be covered in this letter and jurisdiction within Wright's Field that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.
O1-3	In Section 4.4.2.1 Physical Conditions described visitors use of trails, "Several dirt trails traverse the BSA, most notably in the northern portion. Trails connect the eastern portion of the property where many hikers begin their journey, to the west, south, and north of the site and into Wright's Field." With a project design including parking for 250 vehicles, it can be	This comment refers to a portion of the Draft EIR that acknowledges the potential increase in visitor use of the park and associated effects. No further response is required. No changes to the Draft EIR are needed.

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	assumed that a dramatic increase in visitors entering WFP with significant impacts. In fact, this is acknowledged on page 4.4-19 of the DEIR, that impacts would increase the amount of anthropogenic influence in the areas along the existing trails.	
O1-4	The trail design shown in Figure 4.4-3 Special Status Wildlife shows all three planned trails in the Project traverse through Quino checkerspot butterfly (*Euphydryas editha quino*) (QCB) host plants (northern trail on the project site and the 2 southern trails lead to QCB host plants adjacent to the project boundary). More specifically, The DEIR describes these impacts, "QCB may be restricted from accessing these host plants, reducing the potential reproductive success of those individuals. These indirect impacts from increased human presence along trails may cumulatively result in QCB's reduced use of habitat immediately surrounding the trails." These trails are apparently chosen for the Project because they conveniently currently exist. This is to highlight the point that existing trails creating QCB habitat impacts are not necessarily the trail design to implement for the project. Mitigation should include dealing with the cause of the impacts instead of creating mitigation habitat elsewhere. Can the Project trail design be changed to remove or lessen QCB habitat impacts?	The host plants occurring adjacent to the trails are not within the trails and, therefore, direct impacts on these individuals are not expected. Indirect impacts are disclosed in the EIR. These indirect impacts on QCB would not be significant because they would not result in the direct loss of individuals or habitats. QCBs are presumed to currently utilize areas adjacent to trails as host plants and the increase in human activity along these trails from the formalization of the trails and creation of the Alpine County Park is not expected to result in a regional, long-term decline of this species, nor to result in any additional direct take of these individuals. The large stand of Plantago in the northern portion of the project site is directly adjacent and surrounded to the east by closed-canopy scrub habitat that was determined during protocol-level surveys for QCB to not be suitable for QCB in accordance with the definition of "Excluded Areas" in the 2014 USFWS Survey Guidelines. In the southern portion of the project area, the Plantago was 20–30 feet from the existing dirt road that leads to the Wright's Field property. This road is being maintained for access to Wright's Field. It is not anticipated that this road would see a major increase in either pedestrian or vehicular traffic from the project. The other alternative to accessing Wright's Field would be from the south, directly off South Grade Road. This access road is much more overgrown and supports a substantially larger population of Plantago, and it is where ICF directly observed QCB in 2020. As a result, the proposed access road to Wright's Field through the central portion of the County's parcel should be maintained as it is proposed in the Draft EIR and reflects the least impactful option for permanent access to the Wright's Field Preserve. As discussed in Section 4.4.4.3 of this Final EIR, **MM-BIO-3** would require County DPR to seek a Section 10 ITP from USFWS for impacts on QCB-occupied habitat and comply with any additional mitigation required by the ITP. Regardless of the

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		conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat by providing, at a minimum, on-site preservation of occupied habitat for QCB within the open space and ensure that no net loss of QCB host plants will occur because of the project. County DPR shall ensure that there is no net loss of QCB host plants by performing onsite enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to the ITP and will include measures to restore and enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space. No changes to the Draft EIR are needed.
O1-5	In Figure 4.4-2 Special-Status Plants highlight the planned trail system traverses through Engelmann Oak stand. Impact BIO-5 lists impacts to 7 bat species found on the Project which are listed as California Species of Special Concern. These species were observed foraging over most of the native habitat, especially within the open Engelmann oak woodland in the Project. It is stated that there no long-term impacts for species Townsend's Big-Eared bat (*Corynorhinus townsendii*). This species is listed with the CDFW as a Species of Special Concern (SSP) in California. Impact BIO-3 also details construction on the project site within the proposed trail system causing root damage to 25 Engelmann oaks that are likely to lead to the oaks mortality. This is another example of the Project planned trail system causing current and future impacts to Special Status Species. Can the Project trail design be changed to remove or lessen impacts to Townsend's Big-Eared bat and the other 6 bat species?	The planned trail system would not result in any direct impacts on habitat used by special-status species. The trails are proposed within existing trail segments and are disturbed, unvegetated land and would not result in any direct impacts on habitat used by these special-status species. The impacts on Engelmann oaks disclosed in the Draft EIR would result from construction of the proposed Alpine County Park, not from formalizing the existing trails, and would be mitigated through **MM-BIO-2**. **MM-BIO-7** and **MM-BIO-8** contain measures for bats. **MM-BIO-7** includes the installation of bat boxes for pallid bat in coordination with a bat expert that will accommodate both solitary individuals and maternal roost sites. The bat boxes will be monitored and data collected and reported. **MM-BIO-8** contains seasonal construction activity avoidances and buffers if activities occur during the pupping season, in addition to bat roost surveys. No changes to the Draft EIR are needed.
O1-6	The planned trail system has three trails that leave the project site to the west. The northern trail connects to **a nowhere section** in the WFP, and the 2 southern trails connect to existing trails in WFP. Visitors to the Project from 250+ new vehicle	The County worked with BCLT and, at its direction, chose to formalize trails on the County parcel that would direct people away from the most sensitive resources on the Wright's Field Preserve. The northern trail connects to an existing trail on

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	parking spaces that will use the currently planned trail system end up somewhat abandoned at the intersection of the Project and WFP. There is no cohesive trail design in WFP so the new large influx of visitors can create a large influx of impacts to MSCP protected habitat in Wrights Field Preserve. The word "trails" is used 258 times in this DEIR, but there is no cohesive plan for a trail system designed to prevent current and future habitat impacts to vulnerable species. Creating a looped trail system connecting the 3 trails leaving the project site and designed to direct park visitors in a way to enjoy the amenities of the park without directing them into WFP. Can the Project trail design be changed to lessen or prevent a large influx of Project visitors to enter unabated into WFP and incur anthropogenic damage to MSCP protected habitat?	Wright's Field Preserve and has been selected specifically in consultation with BCLT to reduce impacts on biological resources present on Wright's Field to the south. One of the trail segments that would be closed south of this connection leads to a restoration area for San Diego thornmint. By adding this northern connection, fewer visitors would access the section of trail on Wright's Field that accesses this restoration area. Please refer to MR-2 for additional information. Wright's Field has its own formal and informal entrances that are not within the County's property, indicating that usage on Wright's Field is not wholly dependent on what occurs on the County's parcel. No changes to the Draft EIR are needed.
O1-7	CDFW submitted a letter to the Project NOP that included, "CDFW recommends that a site Resource Management Plan (RMP) for the 73-acre open space should be completed before any trails are opened to the public." We encourage and support this approach for there is often only one opportunity to design an effective trial system at the beginning of a large project. California Native Plant Society also submitted a letter to the Project NOP suggesting the CDFW *California Fish and Wildlife Journal* which is recognized in this DEIR on page 4.4.-19 and by using the term, "recreation ecology". The information in this journal recognizes and describes impacts observable and unobservable to wildlife due to human trail use. This quote from an article in the Journal puts it simply, "Accordingly, trails, access points, and associated infrastructure need to be planned and managed appropriately to complement, rather than diminish, conservation values of lands dedicated to the protection of species and their habitats." (Balancing conservation and recreation 2020, Mitrovich).	An RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed.
O1-8	Thank you for the opportunity to comment on the Alpine County Park Project DEIR. Please keep us informed of any changes, updates, hearings, decisions, or other milestones related to this project.	The County appreciates the San Diego Audubon Society for submitting comments on the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

Comment Letter O2: San Diego Chapter of California Native Plant Society (CNPS), Sierra Club San Diego Chapter, and Environmental Center of San Diego, November 15, 2021

Comment#	Comment Text	Response
O2-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report ("DEIR"). The San Diego Chapter of California Native Plant Society ("CNPS"), Sierra Club San Diego Chapter, and Environmental Center of San Diego are united in this commentary on the Alpine Park DEIR. Collectively we have over 15,000 members in San Diego County. We find the DEIR to be a sorely inadequate project description, leaving both the public and the County Board of Supervisors guessing the near-and long-term outcomes of numerous project impacts.	The County appreciates the San Diego Chapter of the California Native Plant Society (CNPS), the Sierra Club San Diego Chapter, and the Environmental Center of San Diego for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. CNPS has commented that the Draft EIR project description and impacts discussions are inadequate. However, no specific reference is cited regarding either an aspect of the project description or impact of concern that CNPS considers to be inadequate. Accordingly, this is considered an introductory comment and no further response is required. No changes to the Draft EIR are needed.
O2-2	While some type of park on this site might be good, the material in the DEIR does not yet rise to the level of a finished design. It fails to meet its own (arbitrary) objectives, and the No Park Alternative better fulfills those same objectives. It is missing necessary analysis, and the DEIR fails to meet County goals to decarbonize, end extinction, and keep people safe from fire. Most importantly, it fails to include potential compromises that would garner broad-based community support while simultaneously meeting the objectives set for it. This is a work in process, not a finished product. It needs a massive rewrite, quite possibly with recirculation, before it goes forward in the CEQA process.	The level of design is believed to be sufficient to both adequately describe the project and its various attributes and uses, as well as being sufficient for purposes of impact assessment. Further specific references in the comment are needed before a targeted response can be provided. Regarding decarbonization, please refer to MR-8 (Greenhouse Gases and Energy) and Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR for a discussion about the impacts of the project on GHG emissions and climate change. Section 4.8 also describes how implementation of **MM-GHG-1: Implement Construction Best Management Practices** will reduce these impacts to a level considered less than significant. Regarding extinction, please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for a discussion about the impacts of the project on biological resources. The County recirculated Section 4.4 to analyze impacts more fully on special-status species. Section 4.4 also describes how implementation of mitigation measures will reduce these impacts to a level considered less than significant. Please also see **MM-BIO-1: Obtain Federally Listed Species Permitting**, **MM-BIO-2: Implement Engelmann Oak**

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		Avoidance and Minimization Measures, **MM-BIO-3: Implement Engelmann Oak Avoidance and Minimization Measures**, **MM-BIO-4: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA**, **MM-BIO-5: Protect Pallid Bat**, **MM-BIO-6: Provide Compensatory Habitat-Based Mitigation**, **MM-BIO-7: Support Pallid Bat**, **MM-BIO-8: Bat Roost Avoidance**, **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**, and **APM-BIO-1: Establishment of the Open Space Preserve**. The County recirculated Section 4.4, *Biological Resources*, to analyze impacts more fully on special-status species. Regarding keeping people safe from fire, please refer to MR-9 (Wildfire) and Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires.
O2-3	**The Questionable Need for the Park** Per the DEIR, page 4.16-2 "According the County of San Diego Parks Master Plan (PMP), the County's minimum level of service standard for local parks is 3 acres per 1,000 residents, and 10 acres per 1,000 residents for regional parks (County of San Diego 2016). However, the goal identified in the 2011 San Diego County General Plan is 10 acres per 1,000 residents for local parks and 15 acres per 1,000 residents for regional parks (County of San Diego 2011a). The PMP minimum standard is an analytical tool for County DPR to determine where parks and recreational resources are needed, whereas the 2011 general plan establishes a goal for long-term park and recreational development. As of 2019, the Alpine Community Plan Area (CPA) has approximately 1.44 acres of local parkland per 1,000 residents, and no regional parkland. These totals do not include parks that are not owned by the County or for which there is no JEPA because, although they may meet some of the recreational needs of particular communities, access and use may be restricted."	This comment restates information presented in Section 4.16, *Recreation*, of the Draft EIR. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.

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O2-4	Per worldview.com, Alpine's 2020 population is 14,878, so it needs 148 acres of local parkland and 222 acres of regional parkland. Per the DEIR, table 4.16-1 (p. 4.16-1, below), Alpine residents have access to 202 acres of unencumbered local parkland at Wright's Field and 28, 020 acres of regional parkland in the adjacent Cleveland National Forest (CNF). **Why was County ownership assumed as a precondition? Where in the PMP does it specify that what entity owns the parks matters?** Wright's Field Preserve operates under agreement with County DPR through the MSCP, and US National Forests are open to the public. **Why does the DEIR fail to analyze the contribution the Cleveland National Forest makes to Alpine.**	See MR-12 (Parks Master Plan) for additional information regarding the County's need for parkland in the Alpine community. No changes to the Draft EIR are needed.

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

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

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

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

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O2-5	I (Landis) went to Wright's Field on Sunday, November 7, 2021 at 1100-1315. The day was clear, partially overcast, in the low 70s, and perfect hiking weather. We saw a total of seven cars parked along South Grade Road (not all at once), and fewer than 20 people, a third of whom were a single family with children. For most of our visit, no other humans were in sight. This is not an overused park. Figure 1 (next page) shows the empty parking lot and three cars across the street at 1:15 pm, when we left. Figures 2 and 3 (next page) show the kind of damage expected in an overused park, these from Los Peñasquitos, where I volunteer weekly.	The information regarding observed park usage is noted for the record. No changes to the Draft EIR are needed.
O2-6	The logic that parkland only counts if it is owned by the County is specious. By that logic I, a resident of Rancho Peñasquitos, live in a park-poor area, because the only county park nearby is a small part of Los Peñasquitos Canyon Preserve. The square miles of city parkland, Torrey Pines State Preserve, the beaches, and the land trust lands do not count. **Why should it matter whether a public park is controlled by federal, county, municipal authorities, or for that matter a land trust with an open access policy?**	See MR-12 (Parks Master Plan) for further details. No changes to the Draft EIR are needed.
O2-7	 Figure 1. Alpine County park parking lot area, empty, with 3 cars (including mine) parked on South Grade Road. This is not excessive use.	The photos provided in this comment are noted for the record. For additional information on recreational facilities, please refer to Section 4.16 *Recreation*, of the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

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	 Figure 2. Concrete fence vandalized by two teenage boys at Del Mar Mesa. This is excessive use.  Figure 3. Wood fence vandalized at Del Mar Mesa, using a Sawzall on the posts and beams, and a razor to deface the keep-out sign (white). This is also excessive use.	

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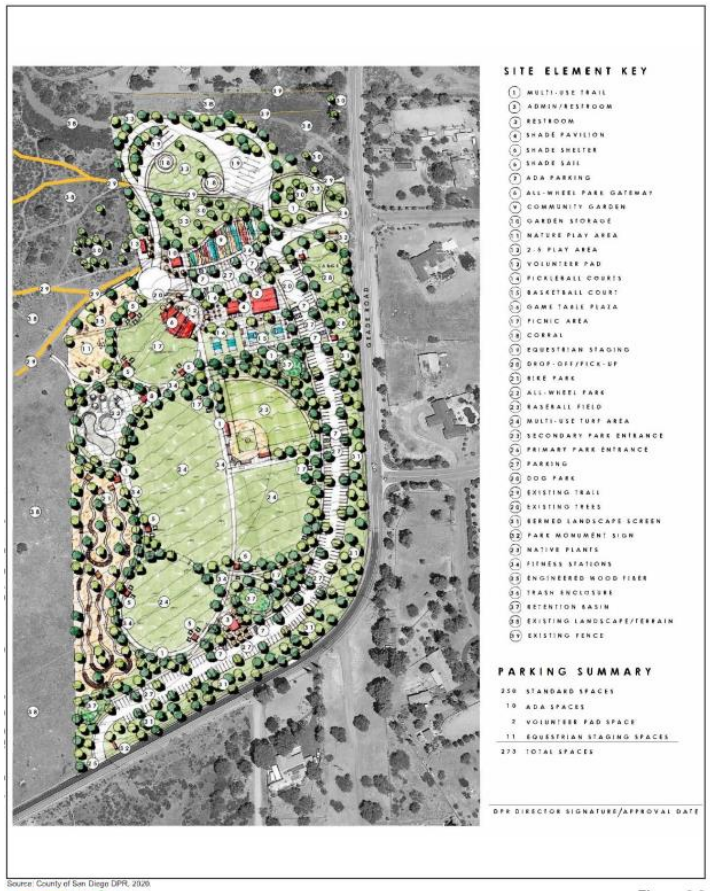
O2-8	 Source: County of San Diego DPR, 2020. Figure 3.2 Proposed Active Park Concept Plan Alpine Park Project	This comment regarding the Proposed Active Park Concept Plan is acknowledged. Please see the RS-Draft EIR for a revised Proposed Active Park Concept Plan.
O2-9	Second, why include the general plan goal COS-21.4 Regional Parks (p. 4.4-6), which requires " new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present." **Why is this regional park goal given as a justification for a local park?** Alpine has almost 100 times more regional parkland than it needs per the PMP. **Does this section even belong in the DEIR?**	See MR-12 (Parks Master Plan) for further details. No changes to the Draft EIR are needed.

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	The need for recreation at this site needs to be rethought. Two possible alternatives are given at the end. As for the project objectives, they are covered at the end as well.	
O2-10	**Issues with the Proposed Design** The project design (DEIR Figure 3.2, previous page) conflicts with the geometry of the site and at least two parts of the DEIR, in that the project cannot not be built as shown if the Project is to implement its mitigation measures to deal with the site. Therefore, the Project Description (Chapter 3, especially Figure 3.2) needs to be revised to reflect the reality of the project.	The comment regarding the project design is acknowledged. The project will comply with all permit requirements in project design and implementation. Setbacks or restrictions for this project where avoidance is not feasible would be incorporated into project design, as required by CEQA. The Proposed Active Park Concept Plan has been revised in the RS-Draft EIR. Please also refer to Table ES-1 in the Draft EIR, presented at the end of the *Executive Summary*, for a summary of the environmental impacts that could result from implementation of the project and feasible mitigation measures that would reduce or avoid the impacts. For each impact, Table ES-1 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after implementation of the mitigation measures. Mitigation measures have been identified for significant impacts associated with construction activities. To the extent feasible, the identified mitigation measures would reduce impacts to less-than-significant levels. Specifically, the County of San Diego General Plan Update Objective LU-2.8, Mitigation of Development Impacts, requires measures that minimize significant impacts on surrounding areas that cause excessive noise, vibrations, dust, odor, or aesthetic impairment and/or are detrimental to human health and safety.
O2-11	First, the project site slopes, with approximately 50 feet of elevation between top in the north and bottom in the south. The highest point is very approximately at the community garden in Figure 3.2, and the site slopes at around a 3% grade both north and south from that ridge. The topographic lines in Figure 3.2 appear to show the slope in 1' increments. **Why are these not more obvious?**	The comment regarding the topography of the project site is acknowledged. The comment will be shared with the County of San Diego Board of Supervisors and the project team. Topographic and slope details will be reviewed as part of the project design phase. No changes to the Draft EIR are needed.
O2-12	The existing slope is proposed to be flattened out in several places, which is good, because a baseball diamond (#23) that	As discussed in Threshold 3 of Section 4.7, *Geology and Soils*, it is estimated that the majority of the soil would be balanced within

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	slopes 6' across the field will be suboptimal for play, while the horse trailers being forced to load on a 3% slope (#19) will be awkward at best and lead to trouble if the horses are not trained for it.[1] However, the massive excavations necessary to flatten out the site are not shown in Figure 3.2, and that is a worse problem. **The site is proposed to be laced with cut and fill slopes, but where are they on Figure 3.2?** While ADA access is not a CNPS issue, one wonders how any wheeled seat, be it a wheelchair or a stroller, will handle the slopes. **Where will the access ramps be?**	the project site. The project would be consistent with County stormwater management requirements and BMPs, including the Preliminary Grading Plan. The project would follow the slope recommendations of the project's geotechnical study (Appendix F of the Draft EIR) to not be steeper than 2:1 and would be consistent with the California Building Code.
O2-13	CNPS is concerned about native plants, and the massive amount of grading is incompatible with the health and continued existence of the Engelmann oaks (*Quercus engelmannii*) and other existing trees on site. While the fill may avoid their trunks, damaging root systems will simply substitute a slow death for a quick one. Furthermore, the DEIR itself (p. 4.7-14) proposes, as mitigation for soil conditions: "[s]ite preparation should begin with the removal of existing improvements, vegetation, utility lines, asphalt, concrete, and other deleterious debris from areas to be graded. Tree stumps and roots should be removed to such a depth that organic material is generally not present.	Impacts on Engelmann oak and special-status plant species are adequately disclosed in the Draft EIR and impacts are adequately mitigated. There are potential impacts on Engelmann oaks from fire fuel modification zones. Although no grading would occur within the canopy of any Engelmann oaks, grading may occur outside of the canopy but within 50 feet of oaks within an area termed the "root protection zone." Twenty-five Engelmann oaks are present within areas where grading would occur in a root protection zone. This impact was disclosed as potentially significant, and, as such, the County will mitigate by planting 25 new oaks within the areas permanently protected on the County parcel through **MM-BIO-2**, which includes avoidance and minimization measures. In addition, the RS-Draft EIR discloses potential impacts on Engelmann oaks from fire fuel modification zones. These are new significant impacts that require mitigation in accordance with the revisions in the RS-Draft EIR.
O2-14	Clearing and grubbing should extend to the outside of the proposed excavation and fill areas. The debris and unsuitable material generated during clearing and grubbing should be removed from areas to be graded and disposed of at a legal dumpsite away from the project area, unless noted otherwise in [the report]." Since existing improvements, utility lines, asphalt, and concrete are largely absent from the site, this is obviously	This comment regarding the existing EIR text is acknowledged. Revisions to the RS-Draft EIR to remove references to the existing asphalt and concrete were made to better reflect the existing site conditions.

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	boilerplate, and its lack of customization shows a complete lack of care by whoever assembled the document.	
O2-15	**How would the (p. 3-5) "21.75 acres of grading…with approximately 47,200 cubic yards of soil excavated**	The imported soil would not be placed within any Engelmann oak canopy. No changes to the Draft EIR are needed.
O2-16	**and approximately 5,750 cubic yards of soil imported to the project" be reconfigured to retain existing trees, as required elsewhere in the DEIR?**	The imported soil would not be placed within any Engelmann oak canopy. No changes to the Draft EIR are needed.
O2-17	Second, as discussed in the fire section below, the County fails to follow its own regulations concerning landscaping in a very high fire hazard zone. Therefore, along with the lack of cut and fill noted on the map, the placement of trees throughout the project certainly appears to be too dense and a fire hazard in an extreme wind driven wildfire. **What would a fire-resistant tree planting and landscape plan look like, in place of Figure 3.2?**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.
O2-18	Third, the project site sits on what soil scientists call a vertisol, the unusual (for San Diego) Lusardi Formation with contains "unweathered granitic rock corestones … and boulders" capped with at least three feet of heavy clay. (p. 4.7-2). "Vertisols are clayey soils [described as "expandable" in the DEIR], which have deep, wide cracks on some occasions during the year ... They shrink when dry and swell when moistened… Irrigation also presents special problems due to their low saturated hydraulic conductivity. Bypass flow in open cracks is the common situation. Because of their low permeability, irrigation of these soils may result in waterlogging and a buildup of salinity unless adequate artificial drainage is provided."[2] In laymen's terms, these soils crack when dry and pull off shoes when wet. If irrigated improperly they pond, ruining lawns and killing trees. If inadequately drained they build up salts, and if improperly engineered, they crack, cracking pavement and foundations, and creating water outflow channels that manifest as perched water tables in cut and fill slopes and berms.	Please see MR-14 (Geology and Soils). The Geotechnical Evaluation describes the presence of expansive clay soils on the site. The landscape architect will review and evaluate the project landscape plans prior to project implementation. Please refer to Section 4.7, *Geology and Soils*, of the Draft EIR for an overview of the existing geologic conditions and the Geotechnical Evaluation (Appendix F of the Draft EIR) for additional information. No changes to the Draft EIR are needed.
O2-19	The vertisol extends across Wright's Field, which is why vernal pools and clay specialists like San Diego Thornmint (*Acanthomintha ilicifolia*) occur there.	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

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O2-20	In design terms, dealing with the impermeable clay requires a massive system of drains that need to be visible in the plans. Compressing this clay for building purposes will make it impermeable, so water will flow laterally, effectively making perched water tables that will leak out of cut slopes and berms if not properly channeled. **Does this affect the park design? If so, what changes need to be made? Will water flowing along impermeable clay surfaces or subterranean cracks cause issues on Wright's Field, on South Grade Road, or to neighbors north of the project? What will be done to prevent salt buildup? How will drainage issues be fixed? Will the soils significantly impact the County by creating an unending maintenance burden and continuous, if minor, property damage on-site? How much will this impact cost annually?**	Please see MR-14 (Geology and Soils) for information regarding design. No changes to the Draft EIR are needed.
O2-21	In a related issue, the plan shows septic systems in this impermeable soil. **Where will the sewage go? How will it affect nearby plants and nearby people?**	Please refer to MR-15 (Water and Wastewater) for information about handling of wastewater. No further response is required. No changes to the Draft EIR are needed.
O2-22	Finally, the trails plan for the rest of the parcel ignores existing unauthorized trails, which can be seen under the map. While the DEIR states that one mile of trail will be retained and approximately 3,300 feet of unauthorized trail will be closed, even a two hour stroll made it obvious that there is more than 3,300 feet of unauthorized trail onsite already. Some of it is visible in Figure 3-2 above. **How much unauthorized trail is actually present onsite?** **All the mitigations and impacts need to be summarized in Figure 3-2, not hidden. What would the proposal actually look like with all required mitigation measures in place?**	The estimates for trail closures were made by careful review of the SANDAG 2017 full-color aerial image in geographic information system (GIS) software. Analysts mapped the visible trails that would be closed as part of the project and calculated the linear distances for all of the trail segments that would be closed. The site supports additional game trails or inactive foot trails that may be visible from aerial imagery but are not the primary focus of the trail closure activities proposed by the County. As a result, the estimate provided in the Draft EIR accurately reflects the intended active trail closure activities envisioned by the County as part of its project. No changes to the Draft EIR are needed.
O2-23	**Procedural Issues with the CEQA process** Unfortunately, the DEIR presents serious procedural flaws. The area impacted by the proposed project is far bigger than area analyzed. It defers mitigation by failing to include a Resource Management Plan for the preserved part of the park, even though this is a basic objective of the Project. It also fails to	Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of project implementation in relation to environmental impacts and mitigation measures. The Draft EIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development.

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	analyze multiple other projects that either it proposes or are being proposed to meet the needs of the proposed project. Whether this is piecemealing of a bigger project or failure to analyze cumulative impacts is unclear. Finally, the County posted a video presentation of the project and claimed this action constituted a scoping meeting.	Please refer to Chapter 5, *Cumulative Impacts*, of the Draft EIR for a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. Please refer to MR-4 (Natural Resource Mitigation) for additional details related to the RMP and to MR-11 (Public Outreach) for more information on the County's public outreach efforts and scoping period. No changes to the Draft EIR are needed.
O2-24	The first issue is that the Project is obviously designed to feed more people into the adjacent Wright's Field Preserve, but the direct, indirect, and cumulative impacts to Wright's Field are not analyzed or mitigated. The very design of the project is absurd without access to Wright's Field. Are dozens of equestrians and mountain bikers expected to show up to use a mile of already-existing trail? Of course not. Furthermore, the site is already an informal, and small, parking lot for Wright's Field. And the project assumes that neighbors will use trails in Wright's Field to access the project. Therefore, the Project's direct, indirect, and cumulative impacts on Wright's Field Preserve have to be analyzed and mitigated. **What are they?**	Please refer to Chapter 5, *Cumulative Impacts*, of the Draft EIR for a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. According to Section 15130(b) of the CEQA Guidelines, cumulative impact analysis may be conducted using the *List Method*, which includes "a list of past, present, and probable activities producing related or cumulative impacts." Past projects are defined as those that were recently completed and are now operational. As detailed within Section 4.4, *Biological Resources*, the project would establish a pathway to existing Wright's Field Trails (Trail #14) that traverse the project. To accomplish habitat-restoration activities, the project would involve trail closure activities along approximately 3,300 linear feet of existing informal-use trails. However, because access would be maintained across the project site, trail closures within the open space portion of the project site would provide access to the existing trails in Wright's Field Preserve to be consistent with the Alpine Community Trails and Pathways Plan. As specifically stated in Chapter 5, *Cumulative Impacts*, "the project's contribution to a cumulative recreation impact is relative to the additional demand a project would place on recreational facilities for which a cumulatively considerable impact has been identified." Because the project does not have a permanent residential component, it would not add an incremental contribution to cumulative recreational impacts due to increased demand. The project would increase the total

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		recreational area available to residents by approximately 25 acres, which would result in a cumulative benefit on recreation. Additionally, as addressed in MR-2, there would be less-than-significant indirect impacts. No further response is required. No changes to the Draft EIR are needed.
O2-25	Second, the project fails to include a Resource Management Plan (RMP). Per P. 4.4-25, "Long-term management of the open space/preserve will also occur as part of the County's commitment to species conservation as a signatory to the Multiple Species Conservation Program (MSCP) and as outlined in a resource management plan that will be prepared for the project." To quote CEQA[3]: "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. **Formulation of mitigation measures shall not be deferred until some future time** [emphasis added]. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure." **Where are the specific performance standards for the RMP, and what potential actions can feasibly achieve those performance standards?** The lack of an RMP is deferred mitigation. The RMP needs to be written, and it needs to also mitigate impacts from the Project to Wright's Field.	Please refer to MR-4 (Natural Resource Mitigation) for additional information regarding the RMP. Please also see Chapter 2, *Environmental Setting*, of the Draft EIR for information on the specifically proposed RMP for the project. Section 4.4, *Biological Resources*, also includes **APM-BIO-1**, which, along with **MM-BIO-6**, would reduce potentially significant direct and permanent impacts on sensitive vegetation communities to below a level of significance through habitat-based mitigation. As defined by the CEQA Guidelines Section 15370, the proposed mitigation measures would avoid, minimize, or eliminate impacts. **APM-BIO-1** states that, as required under the County's MSCP Subarea Plan, the Alpine Park Preserve will be managed in perpetuity pursuant to an RMP. As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. A full-time park ranger, a live-on volunteer, and two maintenance staff are required for the project. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve.
O2-26	Although these provision of water and sewer services are CNPS issues only for the greenhouse gas emissions they emit, these also might be considered as deferred mitigation. Alternatively, the provision of water and sewer services are separate projects	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the CEQA analysis, particularly any impacts for both water and sewer services. Please also refer to MR-15 (Water and Wastewater). Impacts and mitigation

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	with separate CEQA analysis, in which case they were improperly excluded from the cumulative impacts analysis. **Are these part of the Project or not? Where and in what form will their impacts be analyzed? Is also deferred mitigation?**	measures are discussed in Section 4.19.4.3. Please also see MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for more information regarding the RMP. No changes to the Draft EIR are needed.
O2-27	At least two other projects were apparently omitted from the analysis of cumulative impacts. It is not clear whether these projects constitute piecemealing or unanalyzed cumulative impacts. Regardless, they only exist because of the current proposed project, so their cumulative impacts must be analyzed and mitigated. The first is that Back Country Land Trust ("BCLT") is reportedly working with SANDAG to come up with a plan to widen the trails on Wright's Field that feed into the Project site. The other project has been proposed by the Alpine Community Planning Group, to create a sidewalk along the north/west side of South Grade Road from Tavern Road, so that people can use it to walk to the project. Considering that the Project proposes to install tall berms along the edge of Tavern Road, the cumulative impacts of creating tall berms immediately beside a sidewalk along such a known dangerous stretch of road must be considered. **With berms, can pedestrians avoid out-of-control cars? Are other projects known to be in process in the area?**	The list of cumulative projects presented in the LOS-based traffic impact study included cumulative projects that could potentially generate trips to the study area, because the cumulative trips could potentially cause a roadway or intersection to operate at substandard LOS, thereby requiring a different type of intersection control or roadway improvements. The two projects mentioned in the comments do not generate trips, and therefore the cumulative project list provided is adequate. The County will coordinate with SANDAG and the Alpine CPG as these projects move forward. No changes to the Draft EIR are needed.
O2-28	Finally, the County chose to not hold a scoping meeting on this project. Instead, a video was posted on a website, and comments were solicited. **Is a posted video a meeting? If not, what can be done to remedy this clumsy kickoff for the Project?**	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts and scoping period. No changes to the Draft EIR are needed.
O2-29	**Issues with Plants** As mentioned in the previous section, the DEIR fails to include a Resource Management Plan. **Without an analysis of the trails onsite in an RMP, how can any trails plan be even proposed. This has a number of bases:** • **What native plants are adjacent to which trails? How will trail closure affect the plants? Will they be cut down to brush trails closed? Will they be trampled by people going around closures?**	An RMP will be developed prior to formalizing trails and before opening the open space to the public, prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) for further details. Direct or indirect impacts on native plants are not expected to result in any significant impacts on special-status species or sensitive natural communities. See Figure 4 in the BRR for locations of special-status plants. The County is proposing restoration of native grassland within the proposed open space

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	• **Which trails have invasive non-native plant species next to them? Will trail closure stop weeding from occurring, or will it prevent their further spread?**	land, in addition to long-term active management of this area. The restoration efforts and active management of the proposed open space portion of the project would assist in preventing the spread of invasive plants and benefit native habitats. Although there is a potential for impacts on native plants and sensitive natural communities from people going around trail closures or performing illegal vegetation clearing, the County will perform active restoration work on closed trails as part of its RMP, thereby providing a net benefit to native plants and sensitive natural communities compared to baseline conditions. Moreover, the County has proposed additional signage, a live-on volunteer, and park rangers to monitor the Alpine Park Preserve and Alpine Park, as well as a formalized staging area for parking, which would minimize impacts on these special-status species from unauthorized activities (e.g., off-trail trampling, building of jumps/berms within the trails, parking in unauthorized areas). Additionally, the presence of a full-time park ranger on the property is a condition of the project being approved and opened as an active use park. The presence of a full-time park ranger on the County's parcel would further reduce the risk of unauthorized activities within the trail system compared to current conditions where the park is periodically monitored by a park ranger. No changes to the Draft EIR are needed.
O2-30	• Mule deer, which are covered by the MSCP, use trails. **Are any trails used by mule deer?** If so, they cannot be closed, for humans (including mountain bikers) can readily follow deer trails, and efforts to close trails necessarily exclude deer. • **What other wildlife uses with trails? Which will be affected by trail closure?** • **Which trails are regularly used by people, and which are less used? Have trail users been interviewed about their views on which trails to close?**	During development of the proposed trails, the County worked closely with BCLT to determine which trails to close and which to keep open to the public. Trail closures would follow the County's best practices for reducing impacts on mule deer and other native wildlife species. The County acknowledges the difficulty of balancing competing demands when closing trails and is committed to finding win-win solutions and common ground. For purposes of the CEQA analysis, however, trail closure activities are not expected to result in significant impacts on mule deer, special-status species, or sensitive natural communities as described in the Draft EIR. See MR-11 (Public Outreach) for information regarding community input. No further response is required. No changes to the Draft EIR are needed.

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O2-31	• **Are any trails incorporated into first response plans by law enforcement or fire?** If so, they cannot be closed for public safety reasons.	To accomplish habitat-restoration activities, the project would involve trail closure activities along approximately 3,300 linear feet of existing informal-use trails. Because the trail closures pertain to the preserved portion of the project site, they would not impair implementation of or physically interfere with an adopted emergency response plan. Please refer to MR-9 (Wildfire) for additional information regarding emergency response plans.
O2-32	The above questions all should have been asked, but weren't, in the messy failed trail closures on Del Mar Mesa, in which I (Landis) was intimately involved for a decade, as a trail volunteer who worked largely on attempting to close trails and protect rare plants and wildlife. Up until 2020, efforts to close trails caused far more damage to the plants and wildlife than the trails themselves did. In 2020, widespread illegal clearing along trails caused even more damage, but staff and volunteers were unavailable to stop it. There are six lessons from this ongoing mess: • Illegal trails have a community, and trail closure is therefore more a process in influencing the community than one of building barriers. • There is a fundamental asymmetry: Signs, fences and barriers are expensive, require contracts and budgets, and take time to install. Wire cutters cost around $30, portable powered saws are less than $100, and knives and razor blades for vandalizing signs are cheap. Some people (figure 2) use freely available rocks. It is cheaper to vandalize than to rebuild, and this asymmetry always favors the vandals. • Vandalism and trespassing are not capital offenses. Most of the structures that would completely exclude people (especially mountain bikers wearing protective gear) could injure or kill them, as well as injuring or killing wildlife. This asymmetry always favors the trespassers, since they cannot legally be excluded by harmless barricades or other devices.	This comment is acknowledged. No changes to the Draft EIR are needed.

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	• Attempts by park departments to stop vandalism generally cause more harm than good, and often cause more resource damage than the illegal activity they seek to prevent. • Prolonged law enforcement action (chasing down and fining trespassers) does decrease traffic, but it is expensive. • Informal agreements among unauthorized users to limit activity so as to limit the damage caused by official backlash can work, so long as those agreements are honored. Sporadic enforcement normally leads to people lashing out and causing more vandalism elsewhere in the park as a protest.	
O2-33	**Therefore: what data will the project proponents collect on the trail locations and conditions in the project area? How will trails be evaluated for closure or retention? What are the impacts of closure techniques? Who will maintain structures and closures? Will there be any law enforcement activity? Will there be informal social activity to rein in vandals? Will the onsite park volunteer be expected to carry out enforcement duties? If not, who? Are unauthorized trails proliferating in the area? Stable? Decreasing? How will adding 500 people/day change the rate of trail proliferation?**	An RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. These questions will be addressed in the RMP. Additionally, a park ranger would be on site during hours of operation. The live-on volunteer would live on the park site. The park would also include two maintenance staff. Local law enforcement, the County Sheriff, would be contacted if needed. Vehicular gates would be located at each park entrance and would be open and closed (locked) daily. No changes to the Draft EIR are needed.
O2-34	This is what need needs to feed into a Resource Management Plan, one that contains applied recreation ecology. **Why weren't these studies completed, and a RMP written for the DEIR? Until the RMP is written, biological impacts remain unknown and unmitigated.**	An RMP will be developed prior to formalizing trails and before opening the open space to the public, prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). No changes to the Draft EIR are needed.
O2-35	Second, the invasive plant management is problematic. On page 4.4-19, it states "Invasive plant management along the edges of the trails will be a management focus for the County during the	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will include long-term monitoring of onsite preservation areas, nonnative and

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	long-term resource management associated with the open space preserve. As a result, these activities would not present a significant impact on the regional long-term survival of special-status plants present on site." The goal can only be accomplished if action items and performance standards are specified and measured. A "management focus" will just be ignored unless there are specific requirements. **What are those requirements? What cover of non-natives can be maintained? Will Cal-IPC listed plants be targeted for elimination? How will additional weeds be added to the target list? Without actionable details, this impact cannot be mitigated.**	invasive species vegetation management, and habitat restoration in the open space. The RMP will describe the targeted nonnatives, success criteria, maintenance schedule and methods, and annual reporting requirements. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed.
O2-36	Third, table 4.4-4 notes 11.73 acres of offsite mitigation through the purchase of credits or land acquisition. **Where and how will this offsite mitigation occur? Is this also deferred mitigation?** Offsite mitigation options need to be presented to demonstrate this mitigation is feasible and sufficient. Language needs to be added stating that offsite credit purchase or land acquisition must be finalized prior to project approval.	To mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its Biological Mitigation Ordinance to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided per **MM-BIO-9** and **MM-BIO-10** within the open space and/or within offsite location(s), as summarized in Section 4.4, *Biological Resources*, that would include habitat-based mitigation and restoration of grassland. Please refer to MR-4 (Natural Resource Mitigation) for additional information regarding biological mitigation. Language regarding approval of the offsite mitigation or credit purchase has been added to **MM-BIO-9** and **MM-BIO-10**.
O2-37	Among other commenters, CDFW commented on the NOP that they want to see "[a] discussion regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with an NCCP)." Table 1-2 (summary of NOP comments) suggests that this item is addressed in Section 4.4. **Where is it discussed?** We could not find a discussion of the indirect impacts from increased access through Wright's Field as a result of the project.	Please refer to MR-2 (Indirect Impacts on Wright's Field). No changes to the Draft EIR are needed. Indirect impacts on Wright's Field were addressed in the RS-Draft EIR in Section 4.4, *Biological Resources*. Impacts from the project would occur approximately 600 to 800 feet distant from the eastern edge of Wright's Field. At this distance, indirect impacts from both construction and operation of the active park would be less than significant with mitigation (e.g., through noise or dust mitigation), less than significant (e.g., only minor impacts on wildlife present in the open space areas adjacent to the park), or no impact (e.g., no night lighting).

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O2-38	Finally, CNPS has been concerned for years about the spread of water-molds (*Phytophthora* species, pronounced *Fi-toff-thor-a*) through infected nursery stock being planted out in restoration and revegetation projects. This has been a particular problem for oaks, as Sudden oak Death is caused by *Phytophthora ramorum*. The problem is not limited to oaks, as there are upwards of 100 pathogenic water molds known from nurseries and outplantings, and virtually any plant can be infected by some water mold. **We strongly recommend, as part of mitigation MM-BIO-3, that all plants, especially all native species used for restoration plantings in native vegetation, be tested and certified to be Phytophthora free.** CNPS has put together a web-page (https://sites.google.com/site/cnpsphytophthoraresources/) on the issue in conjunction with native plant nurseries throughout the state. Local nurseries should be aware of the issue and be willing to cooperate in this request. Planting clean plants will keep costs down, as replanting gets expensive and controlling a spreading water mold infestation is extremely expensive.	Language has been added to **MM-BIO-2** requiring all Engelmann oak plantings be pathogen free, including *Phytophthora* species.
O2-39	**Wildfire Issues** The analysis of fire risk under hazards is problematic in two unfortunately common ways. First, it asserts without substantial evidence that following fire codes mitigate the risk below level of significance, and second, it fails to follow the County's own regulations for fire-safe landscaping. Finally, proposes to vastly increase the number of people on the parcel and using South Grade Road, while asserting without evidence that this will not be a problem. Substantial evidence is needed to back up these assertions. **Where is that evidence?**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. For additional information on the FEOA and wildfire hazards, please refer to Section 4.9, *Hazards and Hazardous Materials*, and Section 4.20, *Wildfire*, of the RS-Draft EIR.
O2-40	First, the question of concern is asked in DEIR section 4.9 CEQA Appendix G, Question IX (e): "IX. Hazards and hazardous materials. Would the project… g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?" Since structures are proposed on the site, the project is proposed to bring in 500 people/day to the site, and the site is in the CalFire Very High Fire Hazard Zone, the answer is that yes, there is a serious potential impact. The question then becomes whether it can be mitigated. The DEIR	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, of the RS-Draft EIR for additional information concerning applicable ordinances and regulations, and enforcement of County DPR rules and regulations that would reduce wildfire risk.

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	asserted that preventing campfires and constructing buildings to "fire resistive" code was sufficient to mitigate the impacts below significance. If only this were sufficient. Too many extreme, wind-driven wildfires have shown the problems clearly.	
O2-41	First, it is worth pointing out that building anything to code is "fire resistive" not "fireproof." Any number of homes built to code burned in the Thomas, Woolsey, and Paradise fires. Part of the reason for that is inherent in the building code, which reads as follows: "2019 California Fire Code, Title 24, Part 9, Section 4901.2 Purpose: 'The purpose of this code is to provide **minimum standards** to increase the ability of a building to resist the intrusion of a flame or burning embers being projected by a vegetation fire and contributes to a systematic reduction in conflagration losses through the use of performance and prescriptive requirements.' Note these are minimum standards. While necessary, they are not sufficient to mitigate risk to life and structures, as we find in every extreme, wind-driven fire. **Will buildings on site be built to code, or exceeding code? If built to code, what is the remaining risk that needs to be mitigated? Or is the County expected to periodically rebuild? If built exceeding code, what additional features will be added, and how will they reduce risk below significance? What will be done to guarantee that the onsite volunteer living onsite (in a personal trailer?) will be safe from fire?**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, of the RS-Draft EIR for additional information concerning the fire prevention protocols that were recommended in the Rohde and Associates assessment such as Facility Fire-Safe Design and Fuel Modification Program.
O2-42	Second, the County on October 20, 2021 passed an update to County regulations section 68.404. Among other things, these prohibit plants taller than 6" within 5' of buildings, prohibit groundcover taller than 6 to 18 inches within 50 feet buildings, require at least 10' between tree crowns within 50' of buildings, and require vegetation density to be "sparse" 0-5' from buildings "moderate" 5-50' out from buildings, and "No more than 50% of square footage" 50-100' from buildings. To put it very bluntly, this is not what is shown in Figure 3.2. There, trees overlap buildings and there is grass (not sparse plantings) right up to the proposed shade sail, baseball field buildings, and volunteer pad.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20 *Wildfire*, Section 4.9, *Hazards and Hazardous Materials*, and the FEOA in Appendix J of the RS-Draft EIR for information related to wildfire concerns.

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	Worse, the project proposes to clear fuel modification zones into the land preserved under the MSCP, rather than accommodating fuel management onsite (p. 4.9-22). This is less than every single developer is required to do, especially adjacent to MSCP land. As noted in the previous paragraph, the park does not follow fire safe landscaping rules inside its boundary either. **How can the park be redesigned to have both fire safe landscaping within its footprint and to accommodate Brush Management Zones within its footprint, as the County routinely requires developers to do in Very High Fire Hazard Zones and when building adjacent to preserved lands?**	
O2-43	Also, (p. 4.9-22) "Facility Fire-Safe Design. County DPR shall design elements of the project to reduce risk to users and to the area, including fire-resistive approved landscaping, areas that can serve as Temporary Safe Refuge Areas, safe ingress and egress, and a fire-resistive equestrian facility." **How are temporary refuge areas and safe ingress and egress associated with a parking lot that is entirely lined with trees on all sides? How are people expected to get in or out if the trees catch fire?**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Sections 4.20, *Wildfire*, and 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, as County DPR will implement design elements into the project to reduce risk to users and to the area, including fire-resistive approved landscaping, areas that can serve as Temporary Safe Refuge Areas, and safe ingress and egress, and a fire-resistive equestrian facility.
O2-44	**Third, can the evacuation plan for South Grade Road handle cars containing hundreds more people and horse trailers rapidly trying to leave the project site? Given that fire evacuation routes are normally bumper-to-bumper, how can cars and especially horse trailers squeeze onto South Grade Road? If the trees on the park berms catch fire, will they affect South Grade Road as an evacuation route? What can be done to mitigate these risks?**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Section 4.20, *Wildfire*, of the RS-Draft EIR contains information on emergency wildfire evacuations. The County Fire Services staff have reviewed the project EIR and have confirmed the site is accessible for numerous types of vehicles and that onsite utilities are sufficient for emergency response.
O2-45	Unfortunately, these are not trivial issues. CNPS is or has been involved in three lawsuits against the County where fire was an issue, and other groups have won others. Even the California Attorney General is intervening on fire issues. To quote California Attorney General Bonta, on the win over the County on Adara, ""The land use decisions we make now will have consequences for years and decades to come. Today's ruling by the Superior Court affirms a critical fact: Local governments	This comment is acknowledged. Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. For additional information on wildfire conditions and regulations, please refer to Section 4.20, *Wildfire*, of the RS-Draft EIR.

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	have a responsibility to address wildfire risks associated with development projects at the front end. Doing so will save dollars – and lives – down the line."[4]	
O2-46	This is not a threat to litigate, but rather a critical point: with respect to wildfires, especially the extreme, wind-driven fires that cause over 90% of all property and life loss, business as usual is radically insufficient. The park design, as shown in Figure 3.2, does not match the measures discussed in section 4.9 to minimize fire. Worse, the mitigation measures in sections 4.9 and 4.20 are insufficient to mitigate the impacts from fire. Worst of all, the County is not demanding of itself the same measures it routinely requires from developers to mitigate fire impacts, including in neighborhood parks. And the mitigations put forward by developers are failing in court. **What can be done to bring the Park design into compliance with current fire threats, the County's own regulations, and AG Bonta's hope that the County will save lives and dollars through completely addressing fire risks in the CEQA process?**	Please refer to MR-9 (Wildfire) for more information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. For additional information on wildfire conditions and regulations, please refer to Section 4.20, *Wildfire*, of the RS-Draft EIR. During subsequent project design and development, County DPR will coordinate with fire service providers that have jurisdiction over subsequent project sites on project construction design to adhere to regulations and compliances.
O2-47	**Issues with Greenhouse Gases** It is grimly amusing that the DEIR cites Executive Order B-55-18 (carbon neutral by 2045 or earlier and net negative emissions thereafter (p. 4.8-10) and then blithely talks about amortizing carbon emissions until 2052 seven pages later to make emissions less than significant. **This was meant ironically? If emissions from 2022 are to be carried on the books until 2052, does this not mean that the Project fails to comply with all programs directed at reducing societal emissions to zero before 2045? Is this not a significant, unmitigated impact?**	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed. As discussed on page 4.8-13 of the Draft EIR, the project's construction emissions were amortized over the length of the project's expected life span. While project construction is now not anticipated to begin until 2023, the GHG analysis in the Draft EIR projected that project construction would begin in 2022. This means the project's final year would be 2052 at the very earliest. Therefore, the GHG emissions were carried until 2052. Furthermore, as discussed on page 4.8-16, the project's adopted threshold is consistent with CARB's 2017 Scoping Plan, which is a qualitative threshold. As such, as the project has shown consistency with the 2017 Scoping Plan and has highlighted the potential GHG emissions past 2045 based on the current science and methodology, the project would not impede the state from reaching its 2030 and 2045 carbon neutrality goals. No changes to the Draft EIR are needed.

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O2-48	If it hopes to meet its goals and save itself, San Diego County will be working under a decreasing emissions cap and prioritizing emissions going forward, forcing as many groups as possible to decarbonize, and allowing emissions only from critical projects, like public transit, affordable housing, and supplying water, food, power, and sewer service. Therefore, one of the key steps in claiming any special privilege to emit GHGs requires that a project specify, in detail, why it needs to be allowed to emit GHGs while others are not. **What is the reason that the proposed park should be allowed to emit greenhouse gases while most of Alpine will decarbonize? If the Park is to benefit Alpine residents now and into the future, should it not be constructed and maintained with minimal or no GHG emissions? Is there a configuration in which it could sequester enough GHGs to have net negative emissions?**	Please refer to MR-8 (Greenhouse Gases and Energy) and the response to comment O2-47. The project is in compliance with California Green Building Standards Code 2022 standards. These measures include, but are not limited to, water efficiency for all plumbing and lighting fixtures, indoor air quality ventilation standards, insulation requirements, and volatile organic compound limits. By building a park within the Alpine community, residents have a reason to stay and play local versus driving far distances to enjoy the same amenities at other parks. This will help the County meet goals associated with the reduction of GHG emissions generated from activities within the County. In addition, the state is transitioning to fully renewable energy (SB 1020) and is pushing for zero-emission vehicles. However, this technology is still being developed and the project cannot say with certainty that these reductions will be fully applicable. Therefore, the project is showing a worst-case analysis for potential GHG emissions. No changes to the Draft EIR are needed.
O2-49	Second, not all GHG emissions from the Project were counted. Per P. 4.7-14 "Tree stumps and roots should be removed to such a depth that organic material is generally not present… and disposed of at a legal dumpsite away from the project area." Normally, greenwaste rots and produces greenhouse gases. **How much carbon is stored in the project soil as organic matter? What type and amount of GHGs will be produced by its destruction?**	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed. See the response to comment O2-48.
O2-50	Third, per CEQA section 15064.4(b): 'A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment: (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting." As noted in the draft San Diego Regional Decarbonization Framework5, Chapter 4 (citing other sources), grasslands only sequester up to half the carbon as forests. However, adding trees to non-forested landscapes is problematic as the trees may	Please refer to MR-8 (Greenhouse Gases and Energy). As discussed in Section 4.8, *Greenhouse Gas Emissions and Climate Change*, the project's construction activities would result in the generation of GHG emissions that could directly or indirectly have a significant impact on the environment. **MM-GHG-1** would implement construction BMPs requiring equipment to be maintained in good tune and to reduce excessive idling time, utilize alternatively fueled equipment and vehicles, and require older equipment to be retrofitted with advanced engine controls. With implementation of **MM-GHG-1**,

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	require care that makes them carbon emitters, and they offer fewer cobenefits to wildlife. The report further notes (again citing multiple sources) that converting grasslands to settlements generally turns carbon sequestering lands into carbon emitting lands. That is certainly the case here. **Isn't this a significant impact?**	impacts have been mitigated to less-than-significant levels and no changes to the Draft EIR are required. Please see the response to comment O2-48 for additional details.
O2-51	**Can climate change impacts be properly determined without knowing how water and sewer will be supplied to the Project? How were the emissions numbers for water and sewer in the chapter determined, given that elsewhere in the DEIR these structures remain to be determined?**	Please refer to MR-8 (Greenhouse Gases and Energy). The GHG modeling for the project used CalEEMod, which is the industry standard for analyzing air quality and GHG emissions for projects. The project assumed default consumption based on the City urban park land use. This is consistent with other CEQA projects modeled in CalEEMod when project-specific information is unknown. No changes to the Draft EIR are required.
O2-52	**What is the carbon budget of the built park? Are lawns net GHG emitters or a net sequestration, given their shallow roots? Are trees, with the necessity for pruning, watering, fertilizing, net GHG emitters or net sequestration? Given that the trees will be growing in shallow imported soil, how long are they expected to survive, and what are the emissions costs of replacement?**	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are required.
O2-53	**Finally, why didn't the DEIR use the current SANDAG Series 14 growth forecast, instead of Series 13? What happens when Series 14 is used instead?**	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. Generally, SANDAG Series 14 projects a much lower growth in the Alpine CPA. For example, SANDAG Series 13 projects that the population growth for the Alpine CPA would be 23,841 residents by the year 2050 (SANDAG 2013), whereas Series 14 only projects 17,122 residents (SANDAG 2022a). Therefore, the Draft EIR and the LOS-based traffic impact study utilized a much more conservative value when projecting future traffic. No changes to the Draft EIR are needed.
O2-54	**Issues with the Alternatives Analysis** ***How does the preferred project alternative meet its objectives?***	The project includes potential multi-use turf areas, a baseball field, an all-wheel park, a bike skills area, recreational courts (i.e., basketball, pickleball, game table plaza), fitness stations, a leash-free dog area, a nature play area, a community garden, picnic areas with shade structures, picnic tables, and multi-use

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	The alternatives (DEIR Chapter 6) are analyzed against the purpose of the project. Unfortunately, the preferred design is not analyzed against these objectives. Here is our take on how the preferred design meets the project objectives (P. 3-1): • "Create a place where all Alpine residents can gather and connect as a community." **Only one small shade sail shelter appears designed for communal activity, although the baseball field should lead to increased factionalism among the families of the teams competing.**	trails that would provide space for Alpine residents to gather and connect as a community. No changes to the Draft EIR are needed.
O2-55	**Everything else is designed for individual activity, which does not connect people in community.**	Please see the response to comment O2-54 for more information on the proposed amenities designed to create a gathering place for the community. No changes to the Draft EIR are needed.
O2-56	• "Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community both now and in the future." **The proposed design fails to incorporate lessons learned from the construction of Joan MacQueen Middle School, which went over time and budget due to dealing with the same clay and boulder soils under the project. The park fails to justify GHG emissions both during construction and operation, despite the County's increasing commitment to decarbonize by 2035. The project fails to incorporate lessons learned on fire safety, despite the fact that the County has lost multiple lawsuits on this issue and the California Attorney General is now intervening to try to make hazardous projects more safe. Where is the substantial evidence that there is anything forward-looking in the current design, or that it can accommodate a hotter, drier, all-electric, less-lawn future?**	Please refer to MR-14 (Geology and Soils) for more information on the project's design. See the response to comment O2-18. Please refer to MR-8 (Greenhouse Gases and Energy) for more information on the project's GHG emissions. Please refer to MR-9 (Wildfire) for more information on how the project addresses wildfire risks. No changes to the Draft EIR are needed.
O2-57	• "Provide for long-term natural and cultural resource management consistent with the goals and objectives of the Multiple Species Conservation Program (MSCP) for the preserve portion of the property." **How is this goal met, when creation of a resource management plan for the preserve is deferred?**	An RMP will be developed prior to formalizing trails and before opening the open space to the public, prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. There is no requirement that an RMP be prepared before the project is

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		approved. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). Please also see MR-4 (Natural Resource Mitigation) for more information regarding the RMP. A Cultural Resources Monitoring and Discovery Plan will be developed prior to commencement of any ground-disturbing activities within previously undisturbed soils within the project area. See **MM-CUL-1** for further details. No changes to the Draft EIR are needed.
O2-58	• "Design a community park that integrates and, where feasible, preserves natural features into the park design." **What is natural about lawns, a skate park, a baseball field, and 275 parking spaces? Why were commenters' attempts to request feasible alternatives that preserved more natural features summarily rebuffed and not analyzed in the DEIR?**	A passive park alternative was included in Chapter 6, *Alternatives*, of the RS-Draft EIR. This alternative includes a smaller, nature-based park. The project would include up to 240 parking spaces. Please see MR-10 (Passive Park Alternative) for additional information.
O2-59	• Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness, while preserving significant natural and cultural resources. **What is exceptional about ripping up a rare native grassland and planting turf and trees? Nothing could be more 20th Century. What is exceptional about designating one official mile of trail on a site where more than half the existing trails will be closed? What is useful about adding a mountain bike course when bikers can ride miles of trails in the adjacent National Forest? How can a site be preserved if the goal is to increase human usage by an order of magnitude and to radically reengineer it down to the bedrock?**	The commenter's preference for not developing the site for recreational use is noted for the record. No comments are offered regarding specific impact or mitigation issues; therefore, no changes to the Draft EIR are deemed necessary.
O2-60	• Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into park design. **Where is Crime Prevention Through Environmental Design mentioned in the EIR,**	County DPR engaged the County Sheriff's Crime Prevention Through Environmental Design team, who reviewed and shared comments on the draft design concept plan for the park. Their

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	except in lists of objectives? Surely if this is a goal, it wouldn't it be described an analyzed in its own section?	feedback and recommendations were incorporated into the final design concept plan. No changes to the Draft EIR are needed.
O2-61	• Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations. **How does this help the County meet its goals for reducing carbon emissions, reducing fire risk, preserving Tier I vegetation communities, and managing recreational impacts to sensitive species?**	The project includes permanent preservation of Tier I vegetation communities as part of the Alpine Park Preserve, which is tied to approval of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Please refer to MR-4 (Natural Resource Mitigation), **APM-BIO-1**, **MM-BIO-9**, and **MM-BIO-10**. The management of recreational impacts on sensitive species would be facilitated by having a live-on volunteer on site, which is a component of the project. A full-time park ranger, a live-on volunteer, and two maintenance staff are required for the project. As further described in the RS-Draft EIR, the recreational impacts of trail usage are not anticipated to be significantly greater because of the presence of the active use park due to differences in user preferences. Please refer to MR-8 (Greenhouse Gases and Energy) and MR-9 (Wildfire).
O2-62	• Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine. **When over 60% of local respondents asked for more natural space and were told that was impossible, they were getting an active use park whether they wanted it or not, how does this park reflect the character of the community? The community told DPR quite clearly what they wanted. Why aren't their concerns being met?**	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-12 (Parks Master Plan) for information on park needs in the Alpine community. No changes to the Draft EIR are needed.
O2-63	In summary, the proposed project fails to meet most of its stated objectives. Some (Crime Prevention Through Environmental Design, a Resource Management Plan for the preserved portion) are not even part of the DEIR.	County DPR engaged the County Sheriff's Crime Prevention Through Environmental Design team, who reviewed and shared comments on the draft design concept plan for the park. Their feedback and recommendations were incorporated into the final design concept plan. An RMP will be developed prior to formalizing trails and before opening the open space to the public. Please refer to MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for additional information regarding the RMP. Please also see Chapter 2, *Environmental Setting*, of the Draft EIR for information on the

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		specifically proposed RMP for the project. No changes to the Draft EIR are needed.
O2-64	**Other Alternatives** A No Project Alternative performs at least as well as the proposed project. It is forward looking, in that it preserves a landscape that is sequestering carbon (a critical County need for the foreseeable future), and preserves Tier I perennial grassland (habitat preservation is a critical need for the foreseeable future, and potentially a mitigation bank). It is already traversed by a fairly small number of people, in groups and families, so it arguably provides active recreation to the local community. It meets the majority of the community's desire for a rural area with nature (not a naturalistic playground), and it saves the County from unending maintenance costs and carbon emissions to keep acres of lawn green. **Why does the No Project Alternative not score higher than the preferred project?**	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of Alternative 1 – No Project Alternative and its relationship to the project objectives. The alternatives were not ranked, and the final decision on the project or alternative that would be implemented would be determined by the County Board of Supervisors. This comment will be shared with the Board of Supervisors to inform its decision. No changes to the Draft EIR are needed.
O2-65	CNPS requested, in our comment letter to the NOP: "Please include a project alternative with a smaller, nature-focused, minimally developed park that has no impacts to the biological, cultural, and other resources of the project site, Wright's Field Ecological Preserve, and neighboring properties. Given voiced community concerns about the lack of maintenance on existing Alpine parks, please focus on making park upkeep and maintenance financially sustainable for the community and County. Also make its construction, maintenance, and rebuilding carbon neutral and environmentally sustainable, to meet federal, state, and county goals. Please also analyze each and every project alternative equally, as unequal analysis has been contentious on past county projects." None of this was done. **Why not?**	Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in Chapter 6, *Alternatives*, of the RS-Draft EIR. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives.
O2-66	**The proposed equestrian staging area without even a Resource Management Plan utterly fails to meet what the community and CNPS requested.** We recognized that a parking site on the east side of Wright's Field would be very useful and increase safety. A Resource Management Plan for the site is necessary, and the existing perennial grassland may be more	An RMP will be developed prior to formalizing trails and before opening the open space to the public, prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. Please also see MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed.

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	valuable to the County than more lawns. With minimal development, there is less to vandalize, and a dirt parking lot would at least have the advantage of automatically excluding vehicles during rains, when people would cause the most damage to the park and Wright's Field. This arguably meets the project objectives better than the proposed project does. **Why not consider it?**	
O2-67	Alpine has no need for more park area, as it is abundantly supplied by the adjacent Cleveland National Forest and by existing local parks**. When there is a boulder-covered hill with trails on it next to the park, why should any child be confined to a "naturalistic play area?" With 13 mountain biking trails within the adjacent Cleveland National Forest and Wright's Field open to mountain biking for years, why is closing the existing unauthorized trail system down to a single mile of trail worth adding hundreds of parking spots?**	Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
O2-68	Furthermore, Alpine is getting upgrades to its existing parks. The County Supervisors this week (11/17/2021) considering another amendment to the JEPA with Joan MacQueen Middle School. Its purpose is **"to rehabilitate an existing underutilized decomposed granite (DG) multi-use sports field [emphasis added]** at Joan MacQueen Middle School. Once completed, improvements will be open to the public during non-school hours and include an artificial turf multi-use sports field and Americans with Disabilities Act (ADA) improvements to increase field access." Within a mile of the proposed project, there is an underused active recreation field, and the County is ready to spend money to upgrade it. Meanwhile, the proposed	Please refer to Section 4.16, *Recreation*, of the Draft EIR for information on how the County participates in Joint Exercise of Powers Agreements (JEPAs) and other agreements with public and private entities to develop and maintain recreational facilities on non-County lands. The California Association of Joint Powers Authorities defines JEPAs as the joining together of two or more public agencies to provide more effective or efficient government services or to solve a service delivery system (CAJPA n.d.). Several parks in the project area are not owned by the County of San Diego but are available to nearby residents during designated hours because of a JEPA between Alpine Union School District and the County. Parks range in acreage depending on the communities they serve and the uses they permit. The parks may be joint-use facilities such as schools, community centers, athletic fields, and other recreational facilities. The County is allowed limited use of the athletic fields and recreational facilities at Shadow Hills Elementary, Joan MacQueen Middle School, and Boulder Oaks Neighborhood Park, which are owned by Alpine Union School District. No changes to the Draft EIR are needed.

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O2-69	Project probably needs to comply with the ADA, as explained above. **What does this JEPA amendment say about the need for this Project within a mile of it?**	Please see the response to comment O2-68. Please refer to Section 4.16, *Recreation*, of the Draft EIR for additional information on JEPAs. No changes to the Draft EIR are needed.
O2-70	What to do to fix all this? Write a resource management plan for the part that's part of the MSCP Preserve. Re-engineer the curb on the site where the existing parking lot is, to make it more accessible to regular cars. Possibly clear the existing dirt parking lot and move boulders to keep unauthorized expansions from growing the parking lot or people driving onto the grassland. This provides stable access for Wright's Field, which is needed. It can remain dirt, which will appropriately keep people out of the park when the soil is wet. Leave the grassland in its current state. Wait 15 years. If Alpine has grown to the point that it needs more local park space, reconsider developing it using technology that is genuinely carbon neutral. Regardless, in 15 years, create a park that meets the needs of Alpine and the County. Consider that the site as it exists may be more useful to the County as a Tier I mitigation bank and/or a carbon sequestration area, and leave these options open. In a time of rapid change and reorganization, we do not need another heavily engineered, big lawn park to maintain. If the proposed park is built, either it will become a regional destination, in which case Alpine residents will be crowded out, or it will not be used more than the site already is, in which case it will be a white elephant needing continual upkeep and rebuilding due to the expansive soils and climate change. Or both sequentially. By the time Alpine grows enough to generate 500 trips per day as a local park, it will be dilapidated and need massive rebuilding to meet new, carbon-neutral land use codes. **Why not skip the white elephant stage and wait to see what the actual, long-term need is?** **And if the County has millions to spend on parks, why not prioritize those funds to support environmental justice**	An RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed. The RMP will be prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. There is no requirement that an RMP be prepared before the project is approved. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). Please refer to MR-3 (Native Grassland Impacts), **MM-BIO-9**, and **MM-BIO-10** for more information regarding native grasslands. Please refer to MR-12 (Parks Master Plan) for information about park needs in the Alpine community. No changes to the Draft EIR are needed.

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	needs in less advantaged communities? Residents of Alpine seem to agree with this idea. **Why not let them be generous?**	
O2-71	Thank you for taking these comments. Please keep us informed about the project at conservation@cnpssd.org, franklandis03@yahoo.com, gcourser@hotmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments, or to set up a meeting.	The County appreciates the San Diego Chapter of CNPS, Sierra Club San Diego Chapter, and Environmental Center of San Diego for submitting comments on the Draft EIR. This comment and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No changes to the Draft EIR are needed.

Comment Letter O3: Save our Heritage Organization (SOHO), November 10, 2021

Comment#	Comment Text	Response
O3-1	Save Our Heritage Organization (SOHO) has reviewed the draft Environmental Impact Report for the Alpine County Park project (SCH #2021030196). SOHO supports Alternative One, the No Action Alternative due to scale and location, environmental impacts especially those on Wright's Field Preserve, and appropriate alternatives that should be evaluated. SOHO urges the Board of Supervisors to analyze the sustainability and need for this project as well as recognize Alternative One is the most environmentally superior alternative.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. SOHO's preference for the No Project Alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
O3-2	Developing a sports facility consisting of 20 to 50 acres (dependent upon the alternative chosen), where most patrons would drive, does not support the County's Climate Action Plan and would overshadow this rural and natural location. Of similar concern, the scale and activity of this park is not a small nature-based park, which is what the community requested and would be more appropriate next to Wright's Field Preserve.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. For additional information on the passive park alternative, please refer to MR-10 (Passive Park Alternative). With respect to the portion of the comment about a Passive Park Alternative, please refer to MR-10 (Passive Park Alternative).
O3-3	The various environmental impacts are also of large concern, specifically the degraded views and new source of light, impacting the adjacent preserve. Additional issues are the biological, wildfire, and cultural resource impacts of construction and maintenance among others. While Alternative Four reduces these impacts, they are still present.	The commenter's concerns regarding various impacts are noted for the record. Please refer to all sections of Chapter 4 for a discussion of the project's potential environmental impacts and associated mitigation measures. Please see Section 4.1, *Aesthetics and Visual Resources*, for more information about impacts related to lighting and views. No specific references to

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		impact analyses are noted in the comment; therefore, no changes to the Draft EIR are needed.
O3-4	Last, the County should explore other sustainable alternatives to develop parkland for the Alpine community, including the assessment of existing or new sites closer to the community center and accessible through various modes of transportation. Active park amenities could be included within other existing or new parks and provide funds to help maintain parkland.	Please refer to MR-12 (Parks Master Plan) for further details regarding the County's need for parkland in the Alpine Community. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. This complies with CEQA Guidelines Section 15126.6(c), which states: "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." The alternatives analysis is also in keeping with CEQA Guidelines Section 15126.6(a), which states in part: "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." The analysis of alternatives is not required to be as detailed as the analysis of the project. CEQA Guidelines Section 15126.6(d) states: "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be

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		caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed." No changes to the Draft EIR are needed.
O3-5	An inappropriate location for a sizable active-oriented park, this project will create various environmental impacts and more sustainable alternatives have not been evaluated. Therefore, SOHO supports the No Action Alternative.	SOHO's preference for the No Project Alternative is noted for the record. No changes to the Draft EIR are needed. The County appreciates SOHO for preparing comments on the Draft EIR. This comment and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No changes to the Draft EIR are needed.

Comment Letter O4: Back Country Land Trust (BCLT), October 28, 2021

Comment#	Comment Text	Response
O4-1	I'm writing to you and your team to thank you for the thorough study of the proposed park for Alpine and the greater East County area. You may recall three of us on the Board of BCLT, Ann Pierce, George Barnett and I, spoke with you and several colleagues on the afternoon of Jan. 7, 2021. During that Zoom call, we provided input on the tentative County plans for the park and our desire to work with you to fulfill our common goals.	The County appreciates BCLT for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
O4-2	At that time, we expressed our concerns for the park's potential "spillover" impact on Wright's Field's biology and cultural resources we are charged with protecting in perpetuity. We also emphasized that we had kept WF open to the public during the pandemic, when most public parks were closed, on our own dime. We are proud we were able to offer a safe outdoor space for folks during that trying time.	This is an introductory comment about the concerns BCLT expressed during a previous meeting that preceded review of the Draft EIR. Please refer to MR-2 (Indirect Impacts on Wright's Field) and Section 4.4, *Biological Resources*, of the RS-Draft EIR for discussion of potential effects of the project as they relate to Wright's Field.
O4-3	I read the draft EIR front to back, and I'm heartened by its attention to the issues that most concern us: the plants and animals we'll jointly provide refuge for, as well as continuing to offer natural recreation for our fellow humans. I'm impressed with the mitigation efforts proposed for various species on the 20-25 acres that will be disturbed by building the active park's	This comment is acknowledged. The County appreciates BCLT's offer to work with the County on mitigation for needlegrass and QCB host plants. This comment will be shared with the project team. No changes to the Draft EIR are needed.

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	many amenities, which Alpine sorely needs. I'm not a biologist, but we might offer off-site mitigation on WF, for instance, for needle grass and QCB host plants, were that deemed workable and appropriate.	
O4-4	As neighbors, we look forward to collaborating with you on environmental education for East County's students, one of the pillars of BCLT's ongoing community work. Lastly, I am thrilled that the County will have Kumeyaay monitors on call to protect their cultural heritage on the combined preserved lands.	This comment is acknowledged for the record. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
O4-5	I will close by coming back to the "spillover" impact on WF. I didn't see that potential issue addressed explicitly in the various biology/cultural resources sections of the EIR. As a lay reader, perhaps I over-looked it. BCLT's Board appreciates that it's difficult to predict how popular the park will be at this time, but we need to recognize the possibility of "loving Wright's Field to death", and jointly develop a plan to minimize damage to an irreplaceable treasure.	Please refer to MR-2 (Indirect Impacts on Wright's Field) and Section 4.4, *Biological Resources*, of the RS-Draft EIR. Usage of trails on Wright's Field is anticipated to be driven much more by changing conditions in the larger community, including population growth and availability of other open space areas, and even by public health hazards such as during the coronavirus pandemic when increased park usage was observed throughout San Diego County. Language explaining this has been added to Section 4.4, *Biological Resources*, of the RS-Draft EIR. In addition, an RMP will be developed prior to formalizing trails and before opening the Alpine Park Preserve to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details.
O4-6	We look forward to working together as the park takes shape over the next few years.	This comment is acknowledged. The County appreciates BCLT's willingness to collaborate on the project. No changes to the Draft EIR are needed.

Comment Letter O5: Endangered Habitats League, November 2, 2021

Comment#	Comment Text	Response
O5-1	Gentlepersons: Endangered Habitats League (EHL) appreciates the opportunity to comment on the DEIR. 1) General comments The need for the active park facilities envisioned by the project should be reassessed in view of lowered population projections	The County appreciates the Endangered Habitats League for preparing comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. See MR-12 (Parks Master Plan) for details related to the need for park facilities. No changes to the Draft EIR are needed.

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	for Alpine. SANDAG has slashed the County's Regional Housing Needs Allocation and assigned the unincorporated area a fraction of the growth previously projected by 2050. The Alpine Community Plan Update studied a proposal for major up zoning and found it to be financially infeasible. There will not even be enough population growth for a new high school.	
O5-2	Vehicle miles traveled mitigation and the transportation imperatives of the updated Climate Action Plan will further reduce the amount of new growth in Alpine. Reductions in housing capacity compared to prior planning alternatives are inevitable.	This comment provides an observation regarding implementation of the Climate Action Plan and anticipated growth in the Alpine CPA. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
O5-3	For these reasons, prior projections of future active park needs are likely to be overestimates. We urge consultation with DPDS, particularly the group working on the Alpine Community Plan Update (Robert.Efird@sdcounty.ca.gov). In view of reduced future growth, the size of the facility should be reduced.	See MR-12 (Parks Master Plan) for details related to the need for park facilities. No changes to the Draft EIR are needed.
O5-4	2) Biological resources The site is rich in biota, with native grasslands, rare plants and Engelmann oak. It is also occupied by the endangered Quino checkerspot butterfly. It is unclear where the best Quino habitat (typically bare ground with few invasive grasses) is located on-site, but the entire sites should be considered occupied due to Quino flight and mobility. Host plants alone are *not* are reliable surrogate. In any case, reduction of the project footprint to encompass as much suitable habitat as possible in a configuration that reduces edge effects is the prime objective. We suggest a site visit by a biologist with Quino experience.* The mitigation proposed is problematic and reflects lack of understanding of Quino biology and population structure. No net loss of host plants is not adequate mitigation; by itself, it is a superficial approach. The soil substrate is a critical factor, as is freedom from invasives over a much longer period than 5 years. The enchancement and restoration proposed are thoroughly experimental; no such efforts have to-date resulted in new	Native grasslands, special-status species, and QCB are addressed in Section 4.4, *Biological Resources*, of the RS-Draft EIR and in the BRR, which is included as Appendix D to the RS-Draft EIR. Figure 5 of the BRR provides mapping of the QCB host plants and where QCB was observed during 2 years of protocol surveys within the County parcel and 1 year of protocol surveys on the Wright's Field Preserve. Protocol surveys are conducted by biologists who hold 10(a)1(a) Recovery Permits to conduct surveys for this species. For purposes of analyzing impacts, the entire County parcel (minus "Excluded Areas" mapped during protocol surveys for QCB) is considered occupied. No net loss of host plants through habitat restoration activities combined with permanent protection of approximately 65 acres of native habitats within the Alpine Park Preserve is the mitigation strategy developed between the County and USFWS for impacts associated with this project. USFWS is responsible for implementing regulations to comply with the federal

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	colonization over the long term. Furthermore, Quino populations depend upon a variety of micro-environments to survive under various environmental conditions. Removing some unique micro-environments and enhancing or making others a little larger still results in a net loss of the diverse conditions needed to support a metapopulation. For this reason, reduction in project footprint and control of edge effects (invasive plants, Argentine ants, human and vehicular trampling, off-trail activities, etc.) are the most important steps. The latter steps are not proposed as project mitigation. A comment letter for another project is enclosed with more information on the Quino issues described above.	Endangered Species Act [FESA]). The project will seek an ITP under Section 10 of the FESA to address impacts on QCB in accordance with continued consultation with USFWS. Please refer to **MM-BIO-3** for more information. "New colonization" of QCB is not required because the site is currently occupied. This comment appears to be a copy-paste error from the letter regarding the Otay project provided below. Reduction in edge effects within the Alpine Park Preserve will be managed in perpetuity as part of the RMP. Please refer to **APM-BIO-1** for more information. As a result, no further edits to the EIR are required.
O5-5	Thank you for considering our comments.	This comment is acknowledged. The County appreciates the Endangered Habitats League for submitting comments on the Draft EIR. No changes to the Draft EIR are needed.
O5-6	We have reviewed the responses to comments for the Otay Ranch Village 13 project as well as additional materials related to the now-proposed Alternative H. These materials include a Quino Checkerspot Butterfly Management/Enhancement Plan. Our assessment as experienced Quino biologists is below. **I. The FEIR fails to respond to our prior critique on the importance and role of this site for the Otay quino metapopulation** The County's responses to comments on the RDEIR do not address the dynamics of Quino meta populations explained in prior letters and fail to recognize the severe and unmitigable population destabilization that will occur if Alternative H is built. The Alternative H proposal also continues to disregard the implications of the Preston study1, which documents that development proximate (within 1 km) to Quino populations is strongly correlated with extirpation of those colonies (Preston, et al, 2012). Thus, based on the best empirical evidence, the project as proposed is incompatible with long term persistence of the affected populations. Instead of addressing these facts, the FEIR substitutes a "bean-counting" exercise of host plant and butterfly numerical counts	This comment has been provided as context but is not related to the Alpine County Park Project. No edits to the Draft EIR are required as a result of this comment because the comment is not applicable to the project.

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	not based in Quino population biology. The metapopulation structure of Quino populations (described in our prior comment letters submitted in response to the 2015 DEIR) requires a landscape-level habitat mosaic of diverse microclimates, ecotones, and topographic features. This allows for overall population persistence even when particular locations fluctuate over time in their ability to support Quino. Some specific locations will, for example, persist during periods of drought and are essential to population survival. The known persistence of Quino north of Otay Lake on the Village 13 project site shows that the proposed development site is just such an essential "source" in times of regional population stress. The FEIR also ignores population impacts caused by the elimination of topographic diversity in the form of ridgelines and small peaks, which are so important in Quino mating behavior (Shields 1967). The project proponents assert that preservation of some land on-site plus proposed enhancements will retain population viability. There is no evidence to support this, and much to contradict it. The project's vast development footprint would remove 692 acres of Quino habitat, *all* of which is Critical Habitat for the species as determined by the US Fish and Wildlife Service. The simple numerical quantities of occurrences of adult Quino or host plants provided by the EIR are "red herrings" that mislead, as they do not disclose whether the critical resilient locations are preserved or destroyed. Alternative H will eliminate substantial site diversity –in slope, aspect, soil, vegetation, etc. –and, contrary to unsupported claims in the FEIR, will have *devastating* effects on a known and reliable Quino source population. It is notable that the DEIR reports adult QCB and larval host plants scattered over essentially the entire Project site (even during years of suboptimal precipitation); therefore, based on metapopulation dynamics, the entire site must be considered occupied. According to the FEIR, the development footprint of Alternative H directly displaces about 40% of reported QCB	

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	larval host plant sites within the overall project site. The documents point out that some of the densest occurrences of QCB larval host plants would be conserved within proposed open space. **But this is *irrelevant* to an assessment of impacts to the species' survival because QCB metapopulation biology depends less on concentrated patches of host plants than on dispersed larval resources in a diversity of geographic locations and ecological settings for long term metapopulation stability.** In contrast to the EIR's assumptions, it is precisely dispersed (not densely concentrated) larval resources in a diversity of microclimate settings that support the resilience of QCB populations through climate fluctuations and other stochastic events. All QCB resources within the proposed Alternative H development footprint would be eliminated. Additionally, based on the 1 km rule (Preston, et al 2012), essentially all observed QCB adult and larval host plant sites within the proposed preserved open space, and extending into adjacent lands managed by other entities, would be at risk of extirpation. Insofar as the QCB population within the Project site and adjacent properties is integral to the larger Proctor Valley QCB metapopulation complex, Alternative H constitutes an existential threat to the Proctor Valley QCB metapopulation complex (see discussion of biology in earlier comment letters by Ballmer, Pratt, and Osborne dated April 28, 2015 and May 22, 2015). **II. Proper alternatives are not offered.** The EIR has not seriously considered project alternatives that might entail a different location, or a design that would substantially avoid or lessen adverse environmental impacts. As stated in the FEIR global response introductory remark section: Section 15126.6(b) of the CEQA Guidelines states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."	

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	Insofar as the proposed project would significantly and adversely affect a range of biological resources, it must be noted that those resources are largely site specific. It must also be noted that the Proctor Valley QCB metapopulation complex, for which the QCB population within the Project site is an integral part, is apparently the last remaining extant coastal QCB population. The EIR thus must offer alternatives which comply with Preston's 1 km rule; they have not done so. Nor are the proposed mitigations likely to succeed, as explained below. **III. Proposed mitigation is woefully inadequate.** As mitigation for Alternative H, the County proposes to set aside occupied Quino habitat on-site in proximity to the development area and to undertake a very limited program of host plant restoration/enhancement in currently weedy patches in the conservation area. The proposed measures would fail to mitigate for the project's impacts to the Quino for two reasons. **First, the proposed mitigation would not compensate for the diverse microenvironmental range lost in the broad area impacted by the project, the diversity of which is essential for a viable metapopulation.** At best it would produce marginally more host plants in the exact same fewer microenvironmental locations that already exist within the proposed covered space, and therefore perpetrate a great loss of the original diversity of microenvironments. As we explained above, diverse microenvironments are essential to the Quino's survival under different conditions year-to-year. The proposed mitigation would not prevent what would be a huge net loss of metapopulation resilience that will be fatal to this known and vital "source" population of Quino. **The second reason for failure of the mitigation plan is that the restoration/enhancement itself has a low likelihood of efficacy, and indeed, there is no evidentiary support of it providing actual benefit to the Quino.** Even if successful, rehabilitating a *very small* amount of degraded QCB habitat on site cannot mitigate for the loss of *many times* that amount of mature, diverse, occupied habitat within the project impact area. If the proposed mitigation were to be approved, it should at the	

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	very least be accompanied by assurances that it would be accomplished *and its efficacy verified, long-term*, prior to proposed take of currently occupied habitat. And the success of such mitigation would have to be verified for a far longer period than the several years proposed, specifically by monitoring to show that it is occupied by QCB covering a few cycles of annual fluctuations in precipitation typical for Proctor Valley (perhaps 25 years). Regarding the mitigation proposal to create and/or enhance QCB habitat within preserved open space, it is notable that there are no documented instances wherein habitat for QCB was created or "improved" within one kilometer of an urban border, and that creation or restoration was followed by successful recolonization by a breeding colony of QCB. We have also reviewed all available monitoring reports of Quino enhancement/restoration projects to date (Sunrise, SR 125, Lonestar, Otay Ranch Preserve, Otay Crossing, San Diego National Wildlife Refuge). These involve weeding, host plant seeding, and an instance of Quino (larval) augmentation (which is not required for the Village 13project). These reports document *no sustained increase of carrying capacity beyond baseline levels or the establishment of new, self-sustaining Quino populations where none existed before*. The Management/Enhancement Plan's proposed measures therefore have no track record of success. A major component of the proposed management scheme is *weeding*, including removal of thick thatch physically or with herbicides (see p 47ff, High-Intensity Restoration/Enhancement Program, Appendix C). One of us (Osborne) has personally observed the progress of several of the existing enhancement/restoration locations and has never observed any landscape-scale restoration effort and weed control effort that succeeded in establishing the high-quality soil substrate and *Plantago erecta* host quality necessary for Quino. Thus, Quino populations have not been seen to exploit these restored areas. In years of experience watching and participating in these attempted restoration projects, including the San Diego Gas and	

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	Electric Sunrise Powerlink Habitat Restoration Project for the previous several years and the State Highway Route 125 mitigation efforts on Otay Mesa for the previous decade, Osborne observed that either parent soil conditions allowed the weeds in the first place, or restored soil surfaces never (at least over the several years observed) fully recovered from "disturbed" status with overly porous surface conditions that don't retain moisture to the extent that mature substrates with cryptobiotic crusts do. The background reasons on why restoration through weed removal is so problematic has its roots not only in the competitive interaction of exotic weeds and *Plantago erecta* (with competitive exclusion of *Plantago erecta* under most circumstances) but also in the relatively rare convergence of geological and special environmental conditions which allow the competitive escape of *Plantago erecta* in very specific settings where the exotic weeds are unable to gain traction in the first place. In southern California within the domain of Quino, Gabbros, Andesites, and Basalts are among the particular geological underpinnings which under the right conditions, give rise to clay components in the soil surface. Where these clays occur on thin soils, along with cryptogamic crusts, gentle slope aspects and exposed ridgelines, associated soils are relatively less permeable, allowing them to retain springtime moisture and delay host plant deterioration (i.e. senescence). In many other areas of southern California, such as in western Riverside County, soils derived from Schists also support Plantago erecta, but these soils are silty and do not retain springtime moisture in the way that clays do. These differences in soil moisture retention are associated with physical characteristics that are expressed differently in the *Plantago erecta*. Specifically, *Plantago* in well-drained soils are densely covered in small hairs which are not abundant on the smooth-surfaced (glabrous) plants that grow in clay soils. The *Plantago* in silty or otherwise well-drained soil will senesce more quickly. Both the presence of hairs and the early senescence dramatically reduce the suitability of *Plantago* to	

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	Quino as a hostplant. This appears to explain the lack of persistent Quino population complexes in areas with well-drained soils, even when *Plantago* is present and abundant over extensive areas. More generally, areas with granitic geology create sandy, silty, well-drained soils that are typically incapable of supporting extensive stands of *Plantago erecta* (rarely, very limited stands of *Plantago* may occur in very localized situations with impaired drainage, such as a granite slab with a thin veneer of soil). Granitic geology supports Quino populations only at higher elevations, where the butterflies rely on hostplants other than *Plantago erecta* (not applicable to the Village 13 site). As a result of these complex relationships between geology and soils, it is only special circumstances (clays and decades of crust development) which allow the expression of *Plantago erecta* with the suitable characteristics to support Quino. Habitat restoration in the absence of proper underlying soil conditions is both ham-handed and hopeless. Weeding alone cannot recreate the complex necessary conditions for Quino occupancy. County Planning and Development Services, in its response to comment letters on the nearby Otay Ranch Village 14 project, (Otay Ranch Village 14 and Planning Area 16/19, Proposed Project Amendment, Responses to Late Comment Letters, June 2020, p. 45ff), referenced the presence and distribution of soil types including "Olivenhain cobbly loam", "San Miguel-Exchequer rocky silt loam", and "Friant rocky fine sandy loam" and note that Quino were observed on each of these soil types. This reference to soil classifications is a red herring. These observations were all of adult Quino, which disperse, seek nectar sources, hilltop, rest on the ground basking, among other behaviors –all of which behaviors transpire irrespective of ground or soil composition. The issue of soil composition relates only to hostplant quality as this, in turn, influences the oviposition behavior (egg laying) of adults and subsequent development of larvae, which are inextricably associated with their *Plantago erecta* food plants. Raising this specter of very general soil classifications prepared decades ago by the United States Department of Agriculture (https://casoilresource.lawr.ucdavis.edu/gmap/)(classifications	

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	named after soils around exemplar California towns like Vista, Fallbrook, and Hanford) grossly oversimplifies the issue at hand by overlooking the finer intricacies of soil characteristics we have discussed here. As an example (Figure 1), the Quino population complex at Lake Skinner, Riverside County occurs over many classified soil types including Las Posas loam (LaD2), Cieneba rocky sandy loam (CkF2), Vista course sandy loam (VsF2), and Fallbrook sandy loam (FcD2)(see the attached map) but those on the Fallbrook sandy loam (which include rocky peaks) had only hilltopping adults along a ridgeline and never larvae or hostplant. The same was true for hilltopping adults over "Vista course sandy loam". Hostplant stands with larvae occurred on only very tiny fragments of large areas mapped with "Las Posas loam" or "Cieneba rocky sandy loam" but none of these tiny areas could actually be classified as sandy or loamy! In fact, Osborne's personal knowledge of this area acquired during graduate research in the late 1990's(Osborne 1998, Osborne and Redak 2000)and subsequent detailed habitat mapping for the Metropolitan Water District, show irrelevancy of the Department of Agriculture and similar soil maps. Osborne found that all Quino larval occurrences, and indeed, nearly all *Plantago erecta* occurrences, are on thin clay soils derived from gabbroic geology –in areas crudely and inaccurately mapped by the Department of Agriculture as various types. Thus, Department of Agriculture and similar soil maps allow no valid conclusions as to Quino suitability absent a level of detail these maps don't begin to capture. The figure below presents the Department of Agriculture map for a portion of the Quino population complex just south of Lake Skinner, showing the very limited area within grossly mapped soil types where QCB larvae and hosts occur.	

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	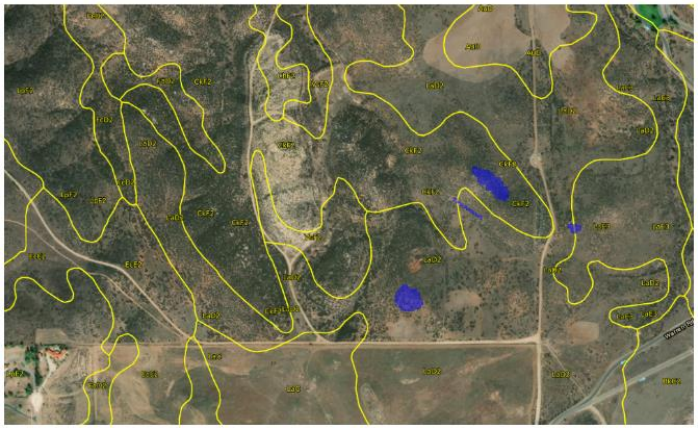 *US Department of Agriculture Soil types and distribution of Quino Larval sites at Lake Skinner, Riverside County Yellow lines separate soil types: Las Posas loam (LaD2), Cieneba rocky sandy loam (CkF2), Vista course sandy loam (VsF2), and Fallbrook sandy loam (FcD2). Osborne's personal observations of occurrences of Quino larvae are shaded blue.* Generally, all of the significant, lowland *Plantago erecta*-associated Quino populations occur on soil conditions that both support the butterfly hostplant **and *exclude competitive exotic annual plants.*** These specialized soil conditions allow 1) presence of the host plant in the first place and 2) relatively delayed host senescence. As we describe above the host plant's springtime longevity is a crucial component of Quino ecology, ***without which local Quino populations are not viable*.** Thus, mere presence of *Plantago* does not equate to suitable Quino habitat. Examples of specialized soil conditions conducive to supporting Euphydryaseditha (of various subspecies) butterfly populations associated with *Plantago erecta* include: • Localized occurrences of shallow soils • Hard surfaces with crust (and/or cryptobiotic crusts, which inhibit exotic grass invasion) • Caustic chemical compositions (for example, derived from serpentine geology in the San Francisco Bay area of central California) and low nitrogen.	

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	For Quino, restoration or enhancement of degraded habitat would require a colossal commitment and efforts applied persistently for many years –and likely in perpetuity –in order to recreate native soil conditions and prevent the ever-ready reinvasion of the exotic annuals. Even if the extreme measure of blading off the soil surface to mineral soils were undertaken, given the delicate and temperamental nature of the soil-*Plantago erecta* relationship, it would likely take decades of biotic soil surface development and vegetation succession, combined with great luck, to achieve any success for Quino habitat restoration. **The soil conditions that have precluded exotic weed invasion and that promote springtime longevity of *Plantago* require special soil structures and decades or centuries of non-disturbance. In our experience, they cannot be recreated simply by weeding efforts.** The proposed weeding of disturbed areas in the Village 13 Quino "Checkerspot Butterfly Management/Enhancement Plan" is woefully inadequate to mitigate for lost Quino-quality *Plantago erecta* habitat and microenvironments that uniquely developed over ecological time. While the management plan monitors preserved open space, if sites are found to be extirpated and vegetation has deteriorated, adaptive management "doubles down" on the failed strategy of restoration (p. 58, Appendix C). Otherwise, contingency plans for restoration failure are vague and merely "initiate other actions" absent specific requirements –let alone demonstrable efficacy – for such actions. To summarize, even if the restoration program proposed for Alternative H were to overcome the near-impossible soil condition obstacles described above, it would *fail* as mitigation because 1) **its scale is miniscule[1]** compared to loss of hundreds of acres of known occupied Critical Habitat and 2) **it would not recreate the diverse microenvironmental range lost in the broad area impacted by the project**, the diversity of which is essential for a viable meta population. It is not merely the loss of larval resources, but the entirety of the mature habitat, including diversity of vegetative and topographic features (Shields 1967),	

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	which contribute to long term population stability and resilience in the face of environmental change. **IV. Conclusion** The high net loss of prime "source population" Quino habitat and inefficacious mitigation is a major unmitigated impact under CEQA and a grave threat to the very survival of this species.	

Comment Letter O6: Preserve Alpine's Heritage, October 12, 2021

Comment#	Comment Text	Response
O6-1	Please see the attached letter requesting a 45-day extension of the deadline to submit comments on the Draft Environmental Impact Report for the Alpine Park Project. I look forward to hearing back from the County.	The County appreciates Chatten-Brown, Carstens, & Minteer LLP for preparing comments on the Draft EIR on behalf of Preserve Alpine's Heritage. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
O6-2	Our firm represents Preserve Alpine's Heritage with regard to the Alpine Park Project ("Project"). Due to the array of significant impacts of the proposed Project, the size of the Draft Environmental Impact Report ("EIR") and appendices, and the limitations on public involvement due to COVID-19 restrictions, we request a 45-day extension for public comment on the Alpine Park Project Draft EIR to ensure adequate time for community and agency review.	A 45-day public review period was provided for public comments as required by the CEQA Guidelines and no extension was required. In addition, the County provided a public notice of the availability of the RS-Draft EIR during the 75-day comment period from December 16, 2022, to February 28, 2023. No changes to the Draft EIR are needed.
O6-3	The extension is especially appropriate given the County's failure to conduct an EIR Scoping Meeting pursuant to Section 15082(c)(1), despite its "Notice of EIR Scoping Meeting" claiming otherwise, and a number of other missteps. (**Exhibit A.**) Posting a link to a pre-recorded YouTube presentation does not constitute a Scoping Meeting. While COVID-19 restrictions limit in-person meetings, the Department could have used a virtual format to conduct an actual EIR Scoping Meeting. Additionally, the public comment period on the Notice of Preparation was from March 9, 2021 to April 7, 2021, yet the YouTube link to the pre-recorded presentation was not posted until March 30, 2021.	Please refer to MR-11 (Public Outreach) for more information regarding public meetings and the public outreach efforts in relation to the EIR. Instructions on how to submit public comments were provided in the NOP posted on the State Clearinghouse website. Additionally, the Notice of EIR Scoping Meeting document provided a direct link to the recorded presentation on YouTube where the presentation is still available as well as contact information if anyone had questions on how to submit comments. No changes to the Draft EIR are needed.

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	The "Notice of Scoping Meeting" did not provide instructions on how to submit comments. The Notice merely provided a deadline for submission of comments and stated, "Information on how to submit comments can be found on the DPR Website." (Ibid.) Finally, the recorded presentation is not currently posted on the Department's website link that is referenced in the Notice.	
O6-4	Therefore, we further request that prior to consideration of the Project for approval that the County hold a public meeting to consider all comments, written and oral, on the Project and the adequacy of the EIR's analysis. We respectfully ask for a response to these requests. Thank you for your consideration.	Please refer to MR-11 (Public Outreach) for more information regarding public meetings and the public outreach efforts in relation to this EIR. No changes to the Draft EIR are needed. The County appreciates Preserve Alpine's Heritage for submitting comments on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter O7: Preserve Alpine's Heritage, November 11, 2021

Comment #	Comment	Response
O7-1	As a community member living in Alpine for over 11 years and as Chair of Preserve Alpine's Heritage (www.PreserveAlpinesHeritage.org), I want to thank you for the opportunity to comment on the Alpine County Park Project's ("Project") Draft Environmental Impact Report (DEIR). I respectfully submit the following for consideration and response.	The County appreciates Preserve Alpine's Heritage for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
O7-2	**Project Alternative: A Nature-Based Park** The proposed 25-acre park plan goes far beyond the 12-15-acre community park concept originally presented to local residents. We expected a park more aligned with the natural and rural location. The County of San Diego Department of Parks and Recreation (DPR) acknowledges this discord when it states in its Frequently Asked Questions document: "Early conversations about the search for a park in Alpine may have referenced smaller acreage, however, the purchase of the 98-acre parcel made it possible to expand acreage opportunities for both active and passive uses." This unjustified increase has taken much of	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to the portion of the comment about a Passive Park Alternative, please refer to MR-10 (Passive Park Alternative) for additional information on the passive park alternative. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. Please refer to MR-12 (Parks Master Plan) for additional information regarding the County's need for parkland in the Alpine community. No changes to the Draft EIR are needed.

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	the community by surprise and is a fundamental source of dissatisfaction and distrust. The community was also led to believe by local leadership that the park would be smaller and more nature-based. To illustrate, Back Country Land Trust board member and Alpine Community Planning Group Member George Barnett stated in 2019: "My understanding is that the County will also plan on passive uses, that is – no active sports playing fields. Maybe there'll be picnic places, a pavilion, a kiddie playground, or things of that nature that town's people want." The currently proposed 25-acre park design was released late summer 2020. The size and scope were a surprise and shock to most of the community who were expecting, and generally in support of, a significantly smaller park. As a result of the unexpected scope of the currently proposed Alpine County Park, as awareness of the design increases, so does the opposition. On page ES-4 under the Executive Summary, the DEIR outlines how the DPR considered four other alternatives to the proposed park: a no project alternative, an even larger sports complex option, as well as two other slight variations on the current active 25-acre project. These alternatives represent extremes and not a more moderate, nature-based option as initially presented and generally supported by the community. Furthermore, the results of the DPR public outreach reveal that a nature-based park is precisely what the community has requested: "… the top five activities the responders selected were walking/jogging, riding a mountain bike on a trail/in a park, nature, dog park, and picnicking. The 5 activities with the fewest votes were swimming pool, football, softball, bocce ball, and tennis/pickleball. The top five elements chosen from the questionnaire were natural areas, restrooms, sidewalks and trails, shade trees, and drinking fountains. The least preferred elements were court and field lighting. The top five elements selected from the image boards were multi-use trails, bike park, dog park, nature-based play, and picnic shelter. The least favored were horseshoe pits, table tennis, tennis, softball, and	

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	youth football." Clearly, the Alpine community strongly prefers nature-based activities over sports-facilities.	
O7-3	Additional support for building a nature-based park instead of an extensive 25-acre sports park is that the abutting Joan MacQueen Middle School is planned for major renovation of its existing and extensive sports facilities. Once again, Back Country Land Trust board member and Alpine Community Planning Group member George Barnett stated: "Plans to refurbish La Crosse, soccer and softball fields at abutting Joan MacQueen Middle School, plans that include a football field, render surplus such facilities at a community park." We agree.	Please see the response to comment O7-2. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR. See MR-12 (Parks Master Plan) for details related to the parks plan.
O7-4	Based on all of the above, we therefore ask: • Given this significant qualitative and quantitative data and input, how can DPR justify the design of the proposed 25-acre park with extensive sports facilities as meeting a local Alpine need?	Please see the response to comment O7-2. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR. The final decision on the project or alternative that would be implemented would be determined by the County of San Diego Board of Supervisors. This comment will be shared with the Board of Supervisors to inform their decision.
O7-5	• Why wasn't the development of a significantly smaller, nature-based park at the location adjacent to Wright's Field Ecological Preserve considered as an alternative?	Please see the response to comment O7-2. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR. See MR-12 (Parks Master Plan) for details related to the parks plan.
O7-6	• Isn't this an option that minimizes the impact on the environment and rural setting, provides appropriate recreational activities that respect and complement the Wright's Field Ecological Preserve, and protects the preserve from habitat destruction due to fragmentation, encroachment, and overflow use from a park?	See MR-12 (Parks Master Plan) for details related to the parks plan. No changes to the Draft EIR are needed.
O7-7	**Inadequate and Biased Public Outreach** The proposed park design was released to the public late summer 2020. Since then, the County has extended many requests for public comment as part of the official planning process. In response, a significant proportion of Alpine community members have responded with thousands of	Please see MR-11 (Public Outreach) for additional details related to the County's public outreach process. Community and interested party feedback was incorporated into the design of the park. No changes to the Draft EIR are needed.

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	commentaries; the majority of which express critical questions and concerns regarding the proposed park design. In fact, when analyzing the public records of these official meetings and calls for comment, approximately 65% have expressed concerns/questions and only 35% have voiced support. These concerns have been categorically dismissed by local and County public representatives and are not represented in the County of Parks and Recreation public outreach data. For example, the County held its fourth and final public outreach meeting on January 14, 2021. This was an online meeting where attendees were allowed to participate only by submitting commentary/questions via the textual chat feature. A breakdown of these comments is as follows. **Number of unique commentators** **91** Number of commentators in support of park 15 (16%) Number of commentators with critical questions/concerns 76 (84%) **Number of total comments** **395 entries / 430 comments** *(Breakdown totals more than 395 as some chat entries included multiple comments)* Number of comments in support of park 25 (6%) Number of general questions (timelines, etc.) 78 (18%) Number of comments related to critical questions/concerns 327 (76%) Number of unique commentators 91 Number of commentators in support of park 15 (16%) Number of commentators with critical questions/concerns 76 (84%) Number of total comments (Breakdown totals more than 395 as some chat entries included multiple comments) 395 entries / 430 comments Number of comments in support of park 25 (6%) Number of general questions (timelines, etc.) 78 (18%) Number of comments related to critical questions/concerns 327 (76%) Despite this strong and disproportionate showing of opposition, the DPR omits any mention of concern from its reporting on the meeting. Its public outreach summary states: “A conceptual park design was shared with the attendees after which a question-and-answer period took place. The meeting was scheduled from 7:00 PM to 8:30PM and several questions from the attendees were asked and answered before the meeting time had ended. The questions that were left unanswered during the meeting, were answered following the meeting and then posted online at the Department of Parks & Recreation, Alpine Park web page.” This	

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	descriptions whitewashes and misrepresents the public comment which generally did not support the proposed design. The same disproportionate expressions of concern/opposition were made by the Alpine community during the June 2021 Board of Supervisor Budget Hearings, as well as during a recent meeting on October 20, 2021. Once again, the strong public comments of concern/opposition were categorically dismissed by the County. Therefore, one must ask: • Why are there public calls for comment during the planning process if the majority of commentary will simply be ignored? • Why are the increasing community concerns not being taken into consideration?	
O7-8	• How can the Department of Parks and Recreation state it is designing a park for the Alpine community when it ignores the input provided by a significant/majority number of Alpine residents?	Please see MR-11 (Public Outreach) for details related to the public outreach process. Community and stakeholder feedback was incorporated into the design of the park. No changes to the Draft EIR are needed.
O7-9	**Inexistant and Unsafe Non-Automotive Access to the Park Site** There are no continuous bike/pedestrian pathways or public transportation directly servicing the proposed park location. As stated on page 4.17-2 under "4.17.2.1 Existing Transportation Conditions" the closest bus stop is approximately 0.88 miles north of the project site". The DEIR goes on to state that "There are no bike facilities along South Grade Road adjacent to the project site." The DEIR also acknowledges that along South Grade Road there currently are no sidewalks or other pedestrian facilities. The sidewalk to be included along the park perimeter will not connect to any of the existing pathways or public transportation leading to other parts of Alpine; most importantly, to the inhabited town center. Therefore, serious questions and concerns are as follows.	This comment reiterates information presented in the Draft EIR and does not raise specific issues related to the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
O7-10	• The DPR calls the project a "drive to" park and has repeated that the only recommended non-automotive access is via Wright's Field. Why does the DEIR not address this major	Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. No changes to the Draft EIR are needed.

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	gap in the park design and provide solutions to address the lack of safe and appropriate access for those on foot or other non-vehicular modes of transportation?	
O7-11	• If the park closes at dusk and the Alpine town center is 1-2 miles away on foot, how can the rugged trails with no lighting in Wright's Field be considered safe and appropriate access before the sun comes up and/or once the sun goes down? • How will non-vehicular access via the dangerous South Grade Road be controlled and/or discouraged?	Please refer to MR-7 (Transportation and Safety) for additional information on project access. No changes to the Draft EIR are needed.
O7-12	• If only accessible via automobile, dangerous roadways, or rocky/uneven/unlit trails, how does the park location promote equitable access for all?	Please refer to MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. No changes to the Draft EIR are needed.
O7-13	**Insufficient Analysis of Impact to Wright's Field Multiple Species Conservation Plan** In 2003, the Back Country Land Trust (BCLT) and the County of San Diego County Department of Parks and Recreation (DPR) submitted an application to the Environmental Enhancement and Mitigation Program (EEMP) to obtain funds to purchase the remaining 142-acre land as Phase IV of the Wright's Field Multiple Species Conservation Plan (MSCP). These efforts were unsuccessful and the majority of this land is now owned by the County as the location being considered for the proposed Alpine County Park. View application, including map on page 39, here.	The County appreciates Preserve Alpine's Heritage for providing this background information. No changes to the Draft EIR are needed.
O7-14	In the application, the BCLT and DPR state: • The acquisition of this land "is critical to the biological and physical integrity of this MSCP preserve. The Phase IV parcel is entirely comprised of native grassland, coastal sage scrub, Engelmann oak woodland, and vernal pool habitats." (Page 7 of the application)	Impacts on sensitive natural communities, special-status wildlife and special-status plants, and wildlife corridors are disclosed in the Draft EIR and RS-Draft EIR.
O7-15	• In addition, the application also addresses sensitive habitats on this land and on Wright's Field MSCP and how the "viability of species within them is increased when they are protected together in an integrated whole". It further outlines how critical this land is as a wildlife corridor.	Impacts on sensitive natural communities, special-status wildlife and special-status plants, and wildlife corridors are disclosed in the Draft EIR and RS-Draft EIR.

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O7-16	This entire document describes how important this parcel of land is to the integrity of the adjacent Wright's Field MSCP and the surrounding natural environment/ecosystem. Therefore, I submit for your consideration and response, the following. • How is it reasonable/acceptable that both the BCLT and DPR now claim the opposite and state that the 25-acre park will not impact Wright's Field MSCP? • How many people will access the park via these trails? • Where are the thorough studies of the impacts to Wright's Field in the DEIR? • What are the biological impacts on Wright's Field Ecological Preserve from fragmentation, encroachment, and overflow use from a large active park? • How will this be appropriately mitigated considering that Wright's Field MSCP is recognized as a unique resource in San Diego County?	Please refer to MR-2 (Indirect Impacts on Wright's Field) and Section 4.4, *Biological Resources*, of the RS-Draft EIR for discussion of potential effects of the project as they relate to Wright's Field.
O7-17	**In Conclusion: Not Against an Alpine Park, Just Against the Scope and Size of *This* Park** Based on the data and the information included in the DEIR, I am simply not convinced that the proposed 25-acre park is what is best for the community, the natural location, or what the majority of local residents want/need. Not only are existing recreational facilities in Alpine underutilized and not properly maintained, but available County survey data does not support inclusion of many of the facilities in the current plans.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to alternative park locations, this alternative does not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time. Please refer to MR-10 (Passive Park Alternative) for a discussion of this alternative. Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park. No changes to the Draft EIR are needed.
O7-18	Since the park design was made public late last year, Preserve Alpine's Heritage has met with the County multiple times and responded to their requests for feedback by submitting questions, expressing concerns, and inviting compromise. We have also asked for transparency in regard to the vetting of other locations, environmental impact studies, financial sustainability,	Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park. No changes to the Draft EIR are needed.

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	etc. All of which have been ultimately disregarded, and in fact, the park design has actually grown since! When questioned, the County explained that this was done in part to meet county-wide metrics, as well as, put quite simply, because they had the space and could do so. In summary, they doubled the park size because they could; not necessarily because it's what's best for Alpine. We are troubled by both this lack of transparency and the lack of accountability to the local community most directly impacted by the park.	
O7-19	Therefore, we request more transparency and responsiveness to the questions and concerns raised by an increasingly important number of Alpine residents. We recognize and thank you for the work already done to bring a park to Alpine. However, the work must continue and our requests are threefold: 1. Recognize that there are too many concerns and unanswered questions regarding the current design to conscientiously proceed as proposed. 2. Reconsider other locations for some or all of the sports amenities. 3. Engage in a collaborative and constructive dialogue with concerned groups to redesign a park that is more balanced and respectful of the natural location.	Please refer to MR-11 (Public Outreach) for additional details related to the County's outreach efforts with the Alpine community. No changes to the Draft EIR are needed.
O7-20	Our group of committed and diverse community members is working hard, investing the necessary time and resources, and will explore all options to oppose the current extensive park design. We sincerely hope the County embraces this invitation to collaborate on finding the right balance for a park that enhances, not overtakes, the amazing rural, cultural, and natural heritage that makes Alpine so special; because once it's gone, it's gone forever. Thank you for your time, consideration, and for keeping me informed of all communications and developments related to the proposed Alpine County Park project.	The County appreciates Preserve Alpine's Heritage for preparing comments on the Draft EIR. These comments and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. Preserving Alpine's Heritage's preference for the No Project Alternative is noted for the record. No changes to the Draft EIR are needed.

Comment Letter O8: Preserve Alpine's Heritage, November 15, 2021

Comment#	Comment Text	Response
O8-1	The law firm of Chatten-Brown, Carstens, & Minteer represents Preserve Alpine's Heritage in connection with the Alpine County Park Project ("Project") and its draft Environmental Impact Report ("DEIR"). Memoranda from biological expert Robert Hamilton (**Exhibit A**) and traffic expert Tom Brohard (**Exhibit C**) are hereby attached and incorporated into this comment letter, and we request responses to the concerns they raise. These comments, and all attachments, should be made part of the administrative record for the Project.	The County appreciates Chatten-Brown, Carstens, & Minteer LLP for submitting comments on the Draft EIR on behalf of Preserve Alpine's Heritage. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
O8-2	Preserve Alpine's Heritage supports the addition of a passive community park at this location and urges the County of San Diego Parks and Recreation Department ("DPR") to consider alternative, less environmentally harmful locations for a regional sports park. The DEIR continuously mischaracterizes the Project as a community park, misleading the public and downplaying its environmental impacts.[1]	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. Please refer to MR-10 (Passive Park Alternative) for a discussion of this alternative. With respect to the portion of the comment about alternative park locations, this alternative does not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time. No further response is required. No changes to the Draft EIR are needed.
O8-3	The Project as proposed would result in significant impacts to biological resources, transportation and safety, greenhouse gas, energy, air quality, wildfire, water supply and wastewater, visual resources and noise, and cumulative impacts that the EIR fails to adequately disclose, analyze, and mitigate. The DEIR must be revised and recirculated to comply fully with the California Environmental Quality Act's ("CEQA") mandate of the full disclosure of all significant environmental impacts and the application of all feasible mitigation for those impacts. (Pub. Res. Code Section 21002, 21002.1, 21081(a).)	This comment is acknowledged. On December 16, 2022, the County provided a public notice of the availability of the RS-Draft EIR. Comments on the RS-Draft EIR were accepted until February 28, 2023 (75-day comment period). See MR-11 (Public Outreach) for further details. The comment does not cite specific issues regarding the impact topics that are referenced. Therefore, no further response can be provided and no changes to the Draft EIR are indicated.
O8-4	**I. <u>Introduction</u>** The Project site consists of 100 acres on undeveloped land, adjacent to Wright's Field Ecological Preserve ("Wright's Field"). (DEIR, p. 2-1.) Wright's Field, managed by Backcountry Land	This comment is acknowledged. Specifics regarding the exact location and design of the community garden will be determined in a subsequent stage of development of the project. The same applies to the design of site drainage elements. Other aspects of

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	Trust ("BCLT"), is part of the County's Multiple Species Conservation Plan ("MSCP"). (*Ibid*.) The Project would develop approximately 25 acres into an active park, proposing new structures including athletic courts, turf fields, a bike park, an all-wheel park, two equestrian corrals and paved staging area, receptacles for waste and equestrian manure, permanent RV staging area, administrative and restroom buildings, dog parks, BBQ pits, a playground and exercise equipment, and a large parking lot. (DEIR, pp. ES-1, 3-2 to 3-3.) The Project identifies the inclusion of 5,000 square feet of a community garden yet does not report further information on the location or design. (*Ibid*.) Around 22 acres of grading would be required. (DEIR, p. 3-5.) The Project will either use on-site septic or will connect existing sewer lines. (DEIR, pp. 3-3 to 3-4.) The Project states that stormwater retention basins will be sited throughout the Park, however the Concept design (Figure 3.2) only displays one basin located near the parking lot. The remaining 70 acres around the active park would remain open space. (DEIR, p. 3-5.) DPR proposes to implement a Habitat Conservation Plan. (*Ibid*.)	the project are noted in the comment, but no specific issues are identified. Accordingly, no further response can be provided. No changes to the Draft EIR are needed.
O8-5	**II. <u>The Project's Draft EIR Fails to Comply with CEQA</u>** **A. The EIR Fails to Consider a Reasonable Range of Alternatives** The "core of an EIR is the mitigation and alternatives sections." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.) An adequate alternatives analysis is crucial to CEQA's substantive mandate to substantial lessen or avoid significant environmental damage where feasible. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403, 405 [requiring more than conclusory statements about the lack of alternative locations].) The EIR "shall describe a range of reasonable alternatives to the project, or to the location . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines ["Guidelines"] Section 15126.6, subd. (a).) As the DEIR states, DPR does not have to consider "every conceivable alternative," but, CEQA requires the inclusion of alternatives	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. This complies with CEQA Guidelines Section 15126.6(c), which states: "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." For additional information on the passive park alternative, please refer to MR-10 (Passive Park Alternative). With respect to alternative park locations, this alternative does not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine,

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	"necessary to permit a reasoned choice." (*Ibid.*; Guidelines Section 15126.6, subd. (f).) CEQA requires discussion of alternatives, even where they "would impede to some degree the attainment of the project objectives." (Guidelines Section 15126.6, subd. (b).) DPR may eliminate an alternative from detailed consideration only where it fails to meet "*most* of the basic project objectives" or is infeasible. (Guidelines section 15126.6, subd. (c), emphasis added.) DPR has failed to demonstrate these conditions preclude analysis of an alternative location, multiple alternative locations ("mini-parks"), a passive park, or a multi-prong approach.	and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time. No further response is required. No changes to the Draft EIR are needed.
O8-6	Preserve Alpine's Heritage reiterates its requested inclusion and analysis of a passive park on this site combined with improvements to existing off-site amenities and/or placement of the environmentally destructive sports park amenities at more appropriate locations (a "Multi-Prong Approach Alternative.") This alternative would present a feasible approach to meet all or most Project objectives. The potential for Joint Exercise of Powers Agreements (JEPA) agreements, such as DPR's recent JEPA-related request for Park Lands Dedication Ordinance (PLDO) funds to improve the nearby Joan MacQueen facilities, supports the feasibility of such an alternative.[2] Therefore, the DEIR must include a Multi-Prong Approach Alternative.[3]	Please see the response to comment O8-5 and MR-10 (Passive Park Alternative). For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-7	Further, in dismissing certain alternatives, DPR failed to "explain the reasons" underlying its determination. (Guidelines Section 15126.6, subd. (c).) Instead, DPR merely quotes the objectives themselves without any explanation for why the requested alternatives below were not included in the alternatives analysis.	Please see the response to comment O8-5. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-8	The DEIR failed to present a reasonable range of alternatives, especially considering the letters received from the public and state agencies requesting the inclusion of such alternatives. Given that one of the Project objectives is to "provide for long-term natural and cultural resource management consistent with the goals and objectives" of the Multiple Species Conservation Program ("MSCP") (DEIR, p. ES-2), it is unreasonable to refuse to consider a passive park, multi-prong approach, or alternative	Please see the response to comment O8-5. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.

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	location. (See *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 547 [finding the failure to include a Smart Growth alternative unreasonable given the Project objective to reduce VMT].)	
O8-9	The DEIR also includes an impermissibly narrow project objective that hinges on the park being at the location itself. (DEIR, p. 6-2, ["Provide for long-term . . . resource management. . . for the preserve portion of *the property*].) The inclusion of a project objective that only applies to this project site improperly excludes the full consideration of alternative project locations.	Please see the response to comment O8-5. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-10	**1. The EIR Fails to Consider Alternative Locations** Due to the presence of highly sensitive habitats (clay soils, native grasslands) and species on the proposed site, the California Department of Fish and Wildlife ("CDFW") specifically requested the consideration of alternative locations—number one on its list of comments submitted in response to the Project EIR Notice of Preparation. (CDFW Letter, p. 3; DEIR Vol. II, p. 15.) CDFW noted the ability for an alternative location to meet community needs and simultaneously prevent impacts to the large block of habitat in the conservation area. (*Ibid*.) The site's location on sensitive geological resources, identified as a potentially significant impact, further warrants inclusion of this alternative. (DEIR, p. ES-16.) Yet, the DEIR does not even consider inclusion of a singular Alternative Location Alternative, and summarily dismisses the inclusion of an Alternative Locations ("miniparks") Alternative in one paragraph. (DEIR, p. 6-4.) The DEIR also fails to demonstrate it actually considered, or is actively seeking, other locations, including those that would not result in the same harmful impacts. No evidence is provided regarding the rejection of these alternatives for further consideration. (DEIR, pp. 6-4 to 6-5.) The County's refusal to disclose the alternative locations that were supposedly considered but rejected on the basis of "confidentiality for the owners of the potential properties" is improper and prevents the public and decision makers from evaluating the propriety of rejecting these alternative locations for failure to "meet many of the project objectives" (DEIR, p. 6-5.) Alternatives are not required to meet	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and a discussion of alternative locations "that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines Section 15126.6(f)(2)(BA)). The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. No further response is required. No changes to the Draft EIR are needed. See MR-12 (Parks Master Plan) for details related to all of the sites the County considered prior to purchasing the property.

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	all project objectives—in reality it "is virtually a given that the alternatives to a project will not attain all of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.)	
O8-11	One commenter suggested two specific alternative locations in a scoping letter, but these were not evaluated. (DEIR Vol. II, pp. 217-218.) In its discussion of Recreation impacts, the DEIR notes that the County's Parks Master Plan found Alpine to have "much capacity" for park acquisition, and identified 70 vacant parcels totaling 219 acres that "may be suitable for park development" if acquired. (DEIR, pp. 4.16-3 to 4.) The DEIR must consider these sites.[4] The DEIR should also analyze the feasibility of improving existing Alpine facilities **(Exhibit E)** and other available sites for new amenities **(Exhibit F)**. That DPR does not currently own an alternate parcel is an insufficient reason to reject the Project's feasibility on that parcel. (See *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1461–1462.) Further, the brief dismissal of this alternative made no reference to the potential for joint use sites tailored to meet Project objectives, only referring to property "owners" in dismissing this analysis as infeasible. (*Ibid*.) Other JEPAs are noted in the DEIR. (DEIR, p. 4.15-4.) The DEIR must consider the potential properties described above, and submitted to the record, in its alternatives analysis.	Please see the response to comment O8-10. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-12	The DEIR improperly dismisses inclusion of the Alternate Locations Alternative on the grounds it "would not meet many of the project objectives, including creating a place where all Alpine residents can gather and connect as a community," and "also would not enable long-term natural and cultural resources management." (DEIR, p. 6-5.) The DEIR fails to detail why these objectives are not met and to consider the remaining objectives in deciding not to include these alternatives. As noted above, alternatives do not have to meet *every single* project objective. Additionally, no evidence supports DPR's assertion that an alternative location, including a smaller sized park with picnic tables, could not provide a place for the community to gather. Nor does DEIR demonstrate how the Alternate Location	Please see the response to comment O8-10. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.

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	Alternative would prevent long-term resources management, as claimed. Election of an alternative location for the active sports park, while maintaining preservation of this site via a passive park, would actually serve to *better manage* cultural and natural resources.[5] The DEIR's claims lack any actual discussion or analysis, and only serve to deprive the public and decisionmakers of a meaningful consideration of alternatives in contravention of CEQA's purpose.	
O8-13	Robert Hamilton further details in his attached comments why the DEIR's rejection of an alternative location lacked adequate cause. (Exhibit A, p. 18.) Preserve Alpine's Heritage urges DPR to include an actual Alternate Location Alternative, separate and apart from a "mini-parks" alternative, and to include both alternatives in the analysis. This is in addition to the inclusion of the Multi-Prong Approach Alternative.	Please see the response to comment O8-10. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-14	**2. Passive Park Alternative** Members of the public also called for the inclusion of the Passive Park Alternative. (California Native Plant Society, DEIR Vol. II p. 22, 25; Preserve Alpine's Heritage, DEIR Vol. II, p. 159; Comments, DEIR Vol. II, pp. 163, 164, 171, 187, 210, 216.)[6] Instead, the EIR similarly dismisses the inclusion of a Passive Park Alternative (in what is the closest to a passive park, the Equestrian Staging and Trails Only Alternative) in a two-sentence statement that lacks any analysis or supporting evidence. (DEIR, p. 6- 5.)[7] The DEIR claims the Passive Park Alternative would not meet Objectives 1, 2, and 5 "because it would not provide a place where all Alpine residents can gather as a community, it would not provide a variety of active and passive recreational uses or an open space preserve, and it would not enhance the quality of life in Alpine by providing exceptional park and recreational opportunities." This explanation is both deficient and inaccurate. Further, Alpine residents would not be precluded from gathering on the site—a Passive Park could still include picnic tables and other spaces. These claimed objectives also do not square with	Please see the response to comment O8-2 and MR-10 (Passive Park Alternative). Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.

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	DPR's plans to designate the Project as a regional park. (Exhibit D.)	
O8-15	DPR refused to include any alternative (besides the legally-required No Project alternative) that was not a large active sports park. The DEIR only considers three alternatives that all include an active sports park of at least 20 acres. (DEIR, p. 6-1.) Many of the Project objectives are predicated on a large active sports park itself— Objectives 1, 2 and 3, which are then singularly used to dismiss any alternative that is not this active park at this location. (DEIR, p. 6-2.) An agency may not use artificially narrow definitions to avoid an adequate alternatives analysis. (*North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 654.) Omission of a reasonable range of alternatives, including the Passive Parks Alternative, not only violates CEQA—it does the public and decisionmakers a disservice. Therefore, Preserve Alpine's Heritage respectfully requests the inclusion of a Passive Park Alternative that includes picnic tables and trails.	Please see the response to comment O8-5. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-16	**3. Deficient Analysis of the No Project Alternative** The DEIR fails to adequately analyze selection of the No Project Alternative. If an agency finds an alternative infeasible, its analysis must explain in "meaningful detail the reasons and facts supporting that conclusion." (*Marin Mun. Water Dist. v. KG Land California Corp*. (1991) 235 Cal.App.3d 1652, 1664.) In dismissing the "No Project" Alternative, the DEIR claims 0 acres will be kept for open space or conservation acreage. (DEIR, p. 6-4.) Yet, the DEIR notes the site already consists of undeveloped, vegetated rural land (DEIR, p. 6-6), which would be preserved under the No Project alternative. The DEIR states that under the No Project alternative, no Habitat Conservation Plan would be prepared, and onsite restoration would not occur. (DEIR, p. 6-7.) Based on this, the DEIR concludes there would not be much biological benefits through the No Project alternative. (DEIR, p. 6-10.) To claim there would be no biological benefits from the avoidance of destroying 25 acres of sensitive habitat and adding 500 daily visitors and the associated noise and foot-traffic impacts is disingenuous.	The commenter appears to be requesting that the County consider further analysis of a No Project Alternative. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. The specific alternative of "No Project" was evaluated along with its impact. The No Project Alternative is the circumstance under which the project does not proceed. This discussion compares and identifies the practical result of the project's non-approval on the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. Additionally, the No Project Alternative was not rejected and was included in the analysis in the RS-Draft EIR. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. The purpose of describing and analyzing a No Project Alternative was to allow decisionmakers to compare the impacts of approving the project with the impacts of not approving the

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		project. The No Project Alternative analysis is not the baseline for determining whether the project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis that does establish that baseline (see CEQA Guidelines Section 15125). With respect to the portion of the comment about a No Project Alternative, please refer to MR-10 (Passive Park Alternative) for a discussion of this alternative in the RS-Draft EIR. No further response is required.
O8-17	The DEIR continues to claim that the No Project Alternative would result in increased recreation impacts because it would fail to provide new recreational facilities to meet demand, despite elsewhere noting the site already provides existing trails (DEIR, p. 4.16-6) and ignoring the County's ability to still maintain and improve Alpine's trail system and other nearby existing facilities under a No Project Alternative. In turn, the County contends that this would lead to "substantial deterioration" via increased use of other existing parks and facilities. (DEIR, p. 6-9.) Yet, in its discussion of the proposed Project's recreation impacts, the DEIR ignores discussion of increased traffic to Wright's Field and potential deterioration of those recreational facilities. (DEIR, p. 4.16-5.) The Project as proposed would close existing, informal trails. (DEIR, p. 1-1.) This closure combined with increased visitors would lead to substantial deterioration of the remaining trails on the Preserve and Wright's Field.	Please see the response to comment O8-16. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the Draft EIR are needed.
O8-18	Finally, the DEIR summarily states that the No Project Alternative would fail to meet many of the Project objectives, without providing any details, facts, or explanations to support its conclusions. (DEIR, p. 6-10.) The DEIR then incredulously concludes, without providing analysis or evidence, that the doubled-in-size Alternative 2 Sportsplex, with increased operations and added stadium lighting, "would meet all of the project objectives," despite its increased impacts and failure to introduce any further mitigation measures. (DEIR, pp. 6-11 to 15, emphasis added.)	Please see the response to comment O8-16. For additional information on project objectives and alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives. No further response is required. No changes to the Draft EIR are needed.
O8-19	**B. The EIR Fails to Adequately Analyze and Mitigate the Project's Impacts**	Changes were made to Section 4.4, *Biological Resources*, of the RS-Draft EIR to address impacts on sensitive natural

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	1. Biological Resources The Project site contains extensive vegetation communities, which include sensitive native grasslands, rare plants and Engelmann oak, as well as other onsite sensitive species. (CDFW Letter, p. 4.) The endangered Quino Checkerspot Butterfly, and associated host plants, occupy the site. Native perennial grasslands are considered special status vegetation types, and the MSCP prioritizes their protection. [8] The Project will result in the destruction of 64% of native grasslands onsite (DEIR, Table 14.4-1) and will impact the remaining open space and the adjacent Wright's Field via increased visitors and the associated indirect impacts.	communities, special-status wildlife, and special-status species. See **MM-BIO-1** through **MM-BIO-10**, **APM-BIO-1**, and MR-2 (Indirect Impacts on Wright's Field) for additional details.
O8-20	Robert Hamilton surveyed the site property and reviewed the DEIR's analysis to biological impacts. Mr. Hamilton's qualifications and CV are attached in **Exhibit B**. For the reasons listed below, he concluded that the Project's environmental analysis and claimed mitigation measures are inadequate. (Exhibit A, pp. 23-24.) Therefore, the DEIR fails to comply with CEQA. Mr. Hamilton's report raises several specific concerns over the DEIR's inadequate analysis, disclosure, and mitigation of the Project's impacts on biological resources. Please specifically address each of Mr. Hamilton's concerns as described extensively in Exhibit A, which is attached to this letter. These concerns include: • The mis-mapped vegetation polygons (pp. 1-4), and the consequences of this for impacts and mitigation. • The failure to adequately analyze, disclose, and mitigate impacts to the Western Spadefoot Toad, including Edge Effects. (pp. 4-8) • The failure to adequately analyze, disclose, and mitigate impacts to protected bat species. (pp. 8-11) • The failure to adequately analyze, disclose, and mitigate impacts to the federally-listed Quino Checkerspot Butterfly. (pp. 11-12)	This comment is a summary of more detailed comments in the comment letter. All of the bulleted comments in this comment are addressed in detail in the County's responses to these specific comments O8-21 through O8-127, below.

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	• Concerns with the proposed Engelmann Oak mitigation measure (p. 13) • The DEIR's unsupported wildlife movement findings. (p. 13-15) • The Project's undermining of the MSCP. (pp. 15-18) • The DEIR's rejection of the alternative location alternative with inadequate cause. (pp. 18-20) • Inconsistencies with DPR's MSCP conformance statement. (pp. 20-23) Preserve Alpine's Heritage presents the additional comments and concerns with the DEIR's analysis and alleged mitigation of the Project's biological impacts.	
O8-21	**i. Impacts to On-Site Preserve and Wright's Field** The County participates in the Natural Community Conservation Planning ("NCCP") program though implementation of its approved MSCP Subarea Plan ("SAP"). The Project would be located adjacent to Wright's Field, MSCP Preserve Land. Wright's Field describes itself as the "heart of Alpine" and provides a home to multiple special status species.[9] The Project itself is located on Pre-Approved Mitigation Area ("PAMA") land, an area with the highest biological value where preservation is encouraged. [10] PAMAs are rare, and their loss and damage jeopardizes the MSCP plan.	This comment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-22	Despite CDFW's requests for a thorough analysis,[11] the DEIR skims over impacts on sensitive communities and preserved land via increased foot traffic. In particular, the EIR failed to meaningfully discuss or mitigate the Project's spillover impacts on designated preserve lands, and the species it provides a home to, from lighting, noise, foot traffic, and other increased human activity. [12] Mr. Hamilton's report further details his concerns over the Project's edge effects on the Western Spadefoot Toad. (Exhibit A, pp. 6-7.)	Changes were made to Section 4.4, *Biological Resources*, of the RS-Draft EIR to address impacts on western spadefoot. See MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details. Additional indirect impacts from increased foot traffic and human activity are provided in the Draft EIR and RS-Draft EIR. and were strengthened in the RS-Draft EIR. See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources. See MR-13 (Noise and Lighting) for more information on proposed lighting and noise impacts for the project.

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O8-23	The DEIR improperly assumes that species not directly located on the Project's active park will not be affected. (DEIR, p. 4.4-16.) In discussing the noise impacts of the larger Sportsplex Alternative, the DEIR admits to impacts on sensitive receptors within the adjacent biological open space areas from increased operations yet fails to adequately disclose and mitigate these impacts on the surrounding biological resources from the Project as proposed. (DEIR, p. 6-13.) The distinction between the two is not detailed or based in objective, science-based reasoning.	See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources.
O8-24	In 2009, the County commented on a proposed high school development ("2009 Project") that would destroy similar areas at the same location. (**Exhibit G**, p. 2.) The County concluded there would be "significant and **not mitigable impacts** to biological impacts" and direct implications to the County's MSCP. (Ibid., emphasis added.) The County described Wright's Field Preserve as "an integral part" of its MSCP, asserting that "any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands . . . already preserved with significant expense to the County and community." (*Ibid*.) The County asserted that "in-kind mitigation is probably not be [sic] feasible." (*Ibid*.) The Project will directly destroy 22.3 acres of grasslands. (DEIR, p. 4.4-28.) Further, the County asserted that the development of "core wildlife area within a PAMA" conflicted with the MSCP Subarea Plan. (Exhibit G, p. 3.) The 2009 Project may not have the exact same design as the Project, however the Project will result in similar impacts to the site and adjacent reserve, warrants further scrutiny into the County's changed stance on this. Mr. Hamilton's letter further raises concerns over the County's contradictions and inconsistencies. (Exhibit A, pp. 16, 24.)	The proposed high school envisioned in the 2009 Draft EIR for High School Number 12 (ICF 2009), was more than twice the size of the park proposed at 50.6 acres for the high school project compared to approximately 25 acres for the park, in addition to the Alpine Park Preserve for the this project. In the site plan for that project, there were also proposed educational facilities directly adjacent to and within a few feet of the eastern border with Wright's Field, whereas for this project, no facilities are proposed for 600 to 800 feet from the Wright's Field Preserve. Because the 2009 high school project is substantially different in terms of size, bulk, and configuration, the conclusions in the two Draft EIRs are justifiably different in terms of the edge effects expected on Wright's Field. See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources.
O8-25	The County also previously commented on the 2009 Project's indirect effects associated with lighting, noise, and ground moisture changes from irrigation runoff and impervious surfaces. (Exhibit G, p. 2.) Yet the DEIR fails to adequately address indirect impacts on the preserve land, despite the	See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources.

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	addition of 500 daily visitors, added lighting, and operational noise—including from a PA sound system. (DEIR, pp. 1-1, ES-21.)	
O8-26	Finally, DPR defers mitigation through its reliance on APM-1 and MM-BIO-6. The CDFW noted in its Scoping Letter that a Resource Management Plan (RMP) *should be completed* for the 73-acre Preserve before any trails are opened to the public, and asserts "discussion is needed on the impacts of the designated trails . . . and the cumulative impacts that will result from an increase in human activity." (CDFW Letter, p. 4.) Onsite habitat restoration or enhancement should be discussed *in detail*. (*Id*., p. 7.) The DEIR completely avoids any discussion of the RMP, instead improperly deferring its creation to a later date.	An RMP will be developed prior to formalizing trails and before opening the open space to the public in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1** for further details. No changes to the Draft EIR are needed. The RMP will be prepared consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). Please refer to MR-4 (Natural Resource Mitigation) for details related to the RMP.
O8-27	**ii. Quino Checkerspot Butterfly** The Project's inclusion in the County's MSCP did not provide take coverage for the Quino checkerspot butterfly ("QCB"), a federally-endangered species found on site. (DEIR, p. 4.4-22; CDFW Letter, p. 5.) CDFW requested that the DEIR address indirect impacts to this species beyond simply avoiding the occupied area. (CDFW Letter, p. 5.) Yet, the DEIR failed to do so and assumes that the on-site QCB and host-plants on the preserve area will not be impacted by increased foot traffic. (DEIR, p. 4.4-22.) The DEIR fails to adequately disclose the Project's direct and indirect impacts on the QCB. The DEIR must consider edge effects on the preserve and conserved spaces that contain QCB and the effect of reduced habitat patch size on population viability at the site.	Please refer to MR-4 (Natural Resource Mitigation) for details related to the QCB. Additional impacts on edge effects and indirect impacts on QCB are provided in the Draft EIR and RS-Draft EIR. Furthermore, the planned Alpine Park Preserve, to be created with implementation of the project, contains all key habitat components required for QCB, including substantial host plant populations, nectaring resources, and hilltops and ridgelines. The Alpine Park Preserve is also contiguous with existing conserved lands within the Wright's Field Preserve. When combined, 98% of the known individual host plants associated with the Alpine Occurrence Complex will be conserved between the two preserves.
O8-28	The DEIR proposes to mitigate impacts to the QCB through later securing an Incidental Take Permit, and subsequent approval of a Habitat Conservation Plan ("HCP"). (DEIR, p. 4.4-22.) This mitigation violates CEQA through improper deferral of mitigation. The DEIR provides no information or performance standards for the HCP. "An EIR may not defer the formulation of mitigation measures to a future time." (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280.) Specific details may only be developed after project approval where including	**MM-BIO-3** provides the details needed to support the conclusion that mitigation will be adequately provided to address impacts on QCB. The performance standard is specified (i.e., no net loss of QCB host plants), and compensatory onsite mitigation and monitoring standards are also included in **MM-BIO-3**. The mitigation measure has been revised slightly to make it clear that the County intends to provide compensatory mitigation and habitat restoration, as well as monitoring regardless of the status

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	them in the DEIR is infeasible and the County commits itself to mitigation via specific performance standards and identifies actions to achieve those performance standards. (Guidelines Section 1.5126.4; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793.) Recent County projects that involved QCB-occupied territory had prepared such plans *before* project approval, which undercuts any claim that including them in the DEIR is infeasible.	of the ITP. Please refer to MR-4 (Natural Resource Mitigation) for details related to the QCB.
O8-29	Mr. Hamilton's letter details further concerns with the proposed mitigation measure. (Exhibit A, pp. 11-12.) When DPR releases its proposed HCP, Preserve Alpine's Heritage requests to be notified of where and when it can publicly comment.	This comment is acknowledged. No changes to the Draft EIR are needed.
O8-30	**iii. Impacts on Special Status Species** The DEIR fails to analyze the Project's impacts on the Western Spadefoot Toad, despite noting the presence of spadefoot eggs in the Biological Report. (DEIR Vol. II, p. 464.) CDFW specifically requested consideration of this sensitive amphibian, among others. (CDFW Letter, p. 4.) Wright's Field features nearby vernal pools that support the spadefoot, among other sensitive species. (*Id*. at p. 5.) The Western Spadefoot Toad is a California Species of Special Concern ("SSC") and is up for listing on the U.S. Endangered Species Act ("ESA"). (Exhibit A, pp. 4-5.) Failure to analyze this impact is a major omission, as detailed in Mr. Hamilton's comments.	Western spadefoot has been addressed in the RS-Draft EIR, as it is a new significant impact. See MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for further details.
O8-31	The DEIR also fails to consider impacts on the Crotch's Bumblebee (California S1S2 rank species and being considered for listing in California); Grasshopper Sparrow (California SSC and S3 rank species); Ferruginous Hawk (California Watch List species, California S3S4 rank species, and federal Bird of Conservation Concern); Northern Harrier (California SSC and S3 rank species); White-tailed Kite (California Fully Protected and S3S4 rank species); and the Oregon Vesper Sparrow (California SSC, S3 rank species, and being considered for listing on the ESA). These species will be most impacted by the loss of native grassland on the Project site.	See MR-5 (Additional Species Analysis). The species mentioned in the Preserve Alpine's Heritage letter were not analyzed for occurrence because they are not documented within 5 miles of the project site in the CNDDB, which was the criterion established for determining which species to analyze in the Draft EIR. However, additional analysis is provided in Section 4.4, *Biological Resources*, in the RS-Draft EIR for all the species mentioned in this comment.

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O8-32	The DEIR also downplays impacts to on-site Engelmann Oak. Extensive declines in Engelmann Oak have occurred over the last 50 years—main threats to the species include grazing, development, poor regeneration of the species, and climate change.[13] While the Project re-designed the equestrian center around the oak trees, the DEIR does not demonstrate the oaks will survive. The proposed mitigation is insufficient given the increased traffic to the area, surrounding development, harsh environment, and time for trees to reach full maturity. The value of oak communities are not met by simply leaving the individual trees standing, without ensuring their survival and the function of the vegetation community around them.[14]	No direct grading impacts would occur on Engelmann oaks or within the dripline (i.e., canopy) of these oaks. Impacts within the root protection zone of 25 Engelmann oaks are included in the Draft EIR and determined to be significant because there is a risk of direct mortality or declines in these individuals. As such, mitigation is provided in **MM-BIO-2** requiring planting of 25 Engelmann oaks and 5 years of monitoring of those plantings. Additional impacts on Engelmann oaks from fire fuel modification zones are newly included in the RS-Draft EIR in Section 4.4, *Biological Resources*.
O8-33	Mr. Hamilton's report raises separate specific concerns with the project's Engelmann Oak mitigation measure as proposed. (Exhibit A, p. 13.) In particular, the oak plantings must be certified pathogen free. (*Ibid*.)	Mitigation Measure **MM-BIO-2** has been modified to include the requirement that oak plantings are certified pathogen free.
O8-34	The DEIR also fails to fully mitigate impacts to *permanent* habitat loss for raptors, as the sole mitigation measure (MM-BIO-4) only addresses temporary disturbance during construction. Moreover, the DEIR addresses foraging habitat of Cooper's and Red shouldered Hawks yet fails to address the grassland obligate raptors mentioned above: Ferruginous Hawk, Northern Harrier, and White-tailed Kite.	The permanent loss of habitat for special-status species and raptors is mitigated through habitat-based mitigation by tiers in accordance with the County's Biological Mitigation Ordinance. Revisions to the RS-Draft EIR have been made to clarify that. See **APM-BIO-1** and **MM-BIO-9**. Proposed impacts on grassland obligate avian species have been added to the RS-Draft EIR and BRR in response to this comment.
O8-35	**iv. Wildlife Corridor Impacts** The DEIR fails to analyze, disclose, and mitigate the Project's impacts to nearby wildlife corridors, instead choosing to simply label the onsite Biological Sensitive Area ("BSA) and adjacent Wright's Field as an "island" of habitat with limited connectivity. (DEIR, p. 4.4-30). The entire impact discussion consists of two sentences. (*Ibid*.)	Changes were made to Section 4.4, *Biological Resources*, of the RS-Draft EIR to provide additional details on how the project could affect wildlife connectivity and corridors. See MR-6 (Wildlife Corridors) for additional details on how the project could affect wildlife connectivity and corridors in the Draft EIR and RS-Draft EIR. Additional significant impacts on wildlife movement are not anticipated.
O8-36	Mr. Hamilton's report details the impropriety of this conclusion. (Exhibit A, pp. 13-15.)	This comment is acknowledged. No changes to the Draft EIR are needed.
O8-37	This greatly contrasts with the County's previous descriptions of Wright's Field and the Project's open space in previous applications for funding. A 2003 application, prepared by BCLT	See MR-6 (Wildlife Corridors) for additional details on how the project could affect wildlife connectivity and corridors in the

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	and DPR, describing Wright's Field and the surrounding areas as "wildlife corridors."[15] (**Exhibit H**, pp. 7, 11, 18, 29, 31, 32.) Destruction of wildlife corridors results in biological impacts and conflicts with Alpine's Community Plan. (*Id*. at p. 32.)	Draft EIR and RS-Draft EIR. Additional significant impacts on wildlife movement are not anticipated.
O8-38	Further, the DEIR admits that Alternative 3, the reconfigured project, would potentially obstruct a wildlife corridor that extends south of the project site and connects with open space land south of South Grade Road. (DEIR, 6-16.) The Project will similarly affect the open space land and Wright's Field, bringing a sizeable increase in vehicular, pedestrian, and bicycle traffic along the surrounding roads and the Project site itself that can similarly impact the wildlife corridor noted in Alternative 3. The DEIR needs to address this discrepancy and adequately analyze, disclose, and mitigate impacts to onsite and surrounding wildlife corridors.	See MR-6 (Wildlife Corridors) for additional details on how the project could affect wildlife connectivity and corridors in the Draft EIR and RS-Draft EIR. Additional significant impacts on wildlife movement are not anticipated.
O8-39	**v. Additional Concerns** Preserve Alpine's Heritage requests that the DEIR analyze impacts to the biological resources (on the site and nearby Wright's Field) from conversion of land to an impervious surface and the increased runoff (DEIR, p. 4.7-13), especially given the use of turf fields and hazardous materials such as pesticides (DEIR, p. 4.9-12) and the site's low permeability. (DEIR, p. 4.7-19.) The DEIR only notes that a stormwater retention basin is "proposed" as part of Project design to manage and treat runoff, yet does not provide information on the location or design of the retention basin. (DEIR, p. 4.7-13.)	Impacts on biological resources are listed in Section 4.4, *Biological Resources*, of the RS-Draft EIR. Additionally, see MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources. Figure 3-2 in the Draft EIR shows the proposed locations for the three stormwater retention basins. The final layout, size, and locations of all stormwater management facilities are currently in design. All project stormwater facilities will meet all State of California and County of San Diego Stormwater BMPs and requirements.
O8-40	**2. Transportation & Safety Impacts** The Project will be located along South Grade Road, creating dangers to passersby, nearby residents and Project visitors. Preserve Alpine's Heritage is concerned about the increased risk to pedestrians, drivers, bicyclists, skateboarders, and all others who use the road. Despite the fact that Preserve Alpine's Heritage raised these safety concerns in their scoping letters (DEIR Vol. II, p. 158), the DEIR utterly fails to disclose, analyze, or even mention this risk and concludes no hazards will be	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, project access, and roadway operation and safety. No changes to the Draft EIR are needed.

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	created by the Project design. There is no mention of previous collision-related fatalities along South Grade Road.	
O8-41	Traffic expert Tom Brohard reviewed the Project design, DEIR, and supporting appendices. His findings and qualifications are detailed in Exhibit C. Mr. Brohard found the DEIR traffic safety analysis wholly inadequate, commenting, "in my over 50-years of traffic engineering and transportation planning experience, I believe that this is one of the worst [TIS] whose unsupported conclusions and recommendations were then carried forward into the [DEIR]."	Please see MR-7 (Transportation and Safety) for additional information on roadway operation and safety. The comment provided in Mr. Brohard's letter is not substantiated by a statement of fact as to why the safety analysis is inadequate and does not meet the requirements of CEQA. No changes to the Draft EIR are needed.
O8-42	As concluded and described by Mr. Brohard, the Project will create risks of increased collisions—a significant impact that requires disclosure and mitigation under CEQA—through its location and design. (Exhibit C.) The DEIR even ignores its own Transportation Impact Study ("TIS"), which recommends the all-way stop design at the primary entrance *because* of the high pedestrian volumes the Project is anticipate to generate, and the history of collisions. The TIS further warns that the stopping sight distance is not met for the location of the all-way stop. (DEIR Vol. II, pp. 900, 940.) As detailed in Mr. Brohard's comments, the addition of the all-stop intersection actually increases the risk of collision. (Exhibit C, p. 4.)	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
O8-43	Mr. Brohard notes the extreme risks to bicyclists along South Grade Road, which will be increased by the Project. (*Id*., p. 3.). Yet, the Project's attractions will bring more bicyclists—and the DEIR notes the inclusion of bike parking—potentially from the nearby schools (DEIR, p. 4.8-19.) The DEIR claims that the Project's operation would not include incompatible uses, such as farm equipment, that could create safety hazards due to increased congestion and faster moving vehicles encountering slower moving vehicles along South Grade Road. (DEIR, p. 4.17-12.) Yet as Mr. Brohard's comments emphasize, the Project will do just that, due to the existing road conditions, Project design, and expected horse trailers that will utilize the primary entrance. (Exhibit C, p. 4.)	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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O8-44	These real concerns were not taken seriously in the DEIR. Further, the Project's potential to create overflow parking on the shoulder and neighboring streets only increases these risks. The TIS states parking is prohibited along both sides of the roadway (DEIR Vol. II, p. 918), yet the DEIR notes signs can be used as needed to prevent potential overflow parking that may occur on South Grade Road. (DEIR, p. ES-2.) If the Project charges for parking, this risk is only increased, as more cars will park on the shoulder and on the neighboring streets. Potentially aware of these safety concerns, the TIS lists "Appendix I FHWA Uncontrolled Crosswalk Excerpt" in its Table of Contents, yet this information is missing from the Report. (DEIR Vol. II, p. 903.)	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would not charge for parking and would include up to 240 parking spaces intended to accommodate local use. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed.
O8-45	Instead of addressing these legitimate risks during the public review process, the DEIR impermissibly defers analysis and mitigation to a later date, stating that the Department of Public Works (DPW) will review the Project for safety and sight distance. (DEIR, p. 4.17-12.) This would occur outside of the CEQA process and prevent the public and decisionmakers from understanding the true safety impacts of the Project (especially in deciding between alternatives.) This fails to mitigate the safety concerns raised by Mr. Brohard. (Exhibit C, p 3.) It is essential to understand the Project's safety impacts, and the feasibility of whether they can be mitigated, now. There also may be costs and further environmental impacts associated with future mitigation (for example, widening of the road, adding turn lanes), which must be addressed concurrently with the Project.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The included traffic safety elements such as the all-way stop and the ingress/egress driveways are not required but are being implemented and have been reviewed by appropriate County staff. The all-way stop is proposed to improve safety conditions, but is not required based upon traffic patterns. No changes to the Draft EIR are needed.
O8-46	**3. Greenhouse Gas, Energy, and Air Quality Impacts** The DEIR presents a theme of shortcuts in analyzing the Project's impacts, especially from its operational Greenhouse Gas (GHG) and emissions. The Project alleges it will not create impacts because it will be community-serving and does not induce further growth, yet avoids any discussion of its recent application for Proposition 68 Regional Park Program grant funding, approved by the Board of Supervisors on October 20, 2021. Contrary to the DEIR's assertions, DPR stated that the	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.

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	Project will "attract visitors county-wide." (Exhibit D, p. 4.)16 "attract visitors county-wide." (Exhibit D, p. 4.)[16]	
O8-47	**i. Greenhouse Gases & Vehicle Miles Traveled (VMT)** The County recently affirmed its commitment to reduce its GHG emissions to address climate change, including through a Board of Supervisors directive to meet and exceed state GHG reduction mandates to guide the region to Zero Carbon, and to develop a legally-compliant Climate Action Plan. (Exhibit I.) The DEIR admits that the 2017 Scoping Plan relies on VMT reductions to achieve its goals, and the California Air Resources Board needs to lower VMT per capita by 14.3% from existing conditions to meet transportation assumptions and 2050 state climate goals. (DEIR, p. 4.6-5.)	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.
O8-48	Despite the state and County's focus on VMT reductions, the DEIR avoids a meaningful discussion or analysis of the Project's potential GHG impacts, allowing itself to avoid incorporation of feasible mitigation measures. The DEIR claims that in the absence of a numerical threshold for the project's region, the significance threshold can be determined by evaluating compliance with state, regional, or local GHG emission reduction plans. (DEIR, p. 4.8-15.)[17] The DEIR thus analyzes whether the Project would align with the SB 32 target, "such as CARB's 2017 Scoping Plan." (*Ibid.*) The DEIR admits potentially significant impacts due to construction-related emissions that would not comply with the 2017 Scoping Plan, and claims mitigation through M-GHG-1. (DEIR, p. 4.8-17.) Yet, M-GHG-1 fails to adequately mitigate construction emissions and does not ensure the few practices that it purports to achieve. M-GHG-1 does not quantify the reductions it aims to achieve, and the three referenced construction BMPs are vague, unenforceable, and insufficient. (DEIR, p. 4.8-19.) [18]	Please refer to MR-8 (Greenhouse Gases and Energy). **MM-GHG-1** would implement measures that would ensure the project's construction activities are consistent with the 2017 Scoping Plan. No changes to the Draft EIR are needed.
O8-49	Further, the DEIR's finding of no significant GHG impacts, despite its failure to include any operational mitigation measures, lacks sufficient evidence and fails to disclose actual Project GHG impacts. In analyzing potential GHG impacts from operational	Please refer to MR-8 (Greenhouse Gases and Energy). As discussed in Draft EIR Section 4.8, *Greenhouse Gas Emissions and Climate Change*, consistency with the 2017 Scoping Plan would not hinder the state from reaching its GHG reduction goals. A

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	emissions (502 MTCO2e annual emissions from area, electricity, mobile, waste, and water), the DEIR first describes several statewide programs in the 2017 Scoping Plan "that require no action at the project level and would benefit project-related emission sources." (DEIR, p. 4.8-18.) It appears that the Project first relies on outside GHG reduction efforts to find no GHG impacts, despite the fact that its avoidance of an actual GHG analysis hinders state reduction goals.	total of 76 percent of the project's GHG emissions would be from mobile sources, emissions of which are regulated at the state level. The Draft EIR discusses how the project would not impede the state's VMT reduction target. Furthermore, the emissions from water and electric sources would be reduced as the state reaches its SB 100 target, which again the project does not have control over. Therefore, the project is consistent with the 2017 Scoping Plan and no operational mitigation measures are necessary. No changes to the Draft EIR are needed.
O8-50	The DEIR points to the County's decision to rescind its Transportation Study Guidelines ("TSG") on September 15, 2021, (DEIR, p. 4.17-8.) and relies on the lack of a County TSG numerical threshold as reasoning to avoid a quantitative GHG analysis and improperly claim less than significant impacts via a "VMT screening analysis." (DEIR, pp. 4.8-15, 19.)	The Draft EIR does not use a "screen-out" criteria analysis. The VMT analysis utilized the state's OPR guidance to conduct the VMT analysis. The County of San Diego Transportation Study Guidelines, adopted in September 2022 and in response to SB 743, provide criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The Transportation Study Guidelines establish the contents and procedures for preparing a Transportation Study in the County of San Diego. The Transportation Study Guidelines aid in determining appropriate mitigation under CEQA, as well as site-specific improvements to the transportation system to accommodate project traffic. The project would have no significant impacts on GHG. Please refer to MR-7 (Transportation and Safety) and MR-8 (Greenhouse Gases and Energy) for additional details. No changes to the Draft EIR are needed.
O8-51	The DEIR states the Project will create 480 daily trips (383 MTCO2e per year), resulting in an annual VMT of 1,024,920.[19] (DEIR Vol. II, p. 323.) As a preliminary matter, these calculations appear to be erroneous. The GHG calculations use an "urban" classification despite the Projects admitted rural setting. (DEIR Vol. II, pp. 256, 320.) Further, it appears that the annual VMT projections would yield an assumed 5.85-mile distance per trip.[20] This contradicts the Project's distance from the town center and plans for a Regional Park to serve county-wide visitors. (Exhibit D, p. 4.) The Project ignores any analysis or mitigation through its improper screening criteria.	The project's daily trips were provided in the Transportation Impact Study (Appendix I of the Draft EIR). CalEEMod defaults were used for the trip distances. As shown in Appendix B of the Transportation Impact Study (PDF page 110), these distances vary from 7.3 miles to 9.5 miles, with diverted, primary, or pass-by trips. No changes to the Draft EIR are needed.

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O8-52	The VMT Analysis (DEIR Vol. II, p. 869) conducted by Chen Ryan is based on an inapplicable category from the since-rescinded County Transportation and Study Guidelines (TSG.) (Ibid.) Chen Ryan concluded that the project falls under a "local serving public facilities and other uses [local parks and trailheads]" category. (Ibid.) Yet, the Appendix Study admits "this category is not in the OPR technical advisory screening criteria." OPR allows for a local serving retail land screening exemption on the premise it redistributes trips into the "**urban fabric**." (DEIR Vol. II, p. 893; DEIR, p. 4.7-11.) This is inapplicable to a regional sports park. Further, the VMT study admits a "small project" exemption, projects creating less than 110 trips, would not apply to the Project. (DEIR Vol. II, pp. 889, 893.) The DEIR even claims that the Sportsplex Alternative, doubled in size and capable of hosting tournaments, would be presumed to have less than significant VMT impacts under this theory. (DEIR, p. 6-14.)	This comment incorrectly states that the VMT analysis was based on the rescinded County's guidelines. Rather, as stated in the Alpine Community Park – Vehicle Miles Traveled (VMT) Analysis technical memorandum by CR Associates: > The analysis is based on the revised (2021) State of California Environmental Quality Act (CEQA) Guidelines. This methodology is consistent with the guidance provided in the Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018 (OPR Technical Advisory), authored by the Governor's Office of Planning and Research (OPR). Because the project is a public facility, the analysis focused on whether the project would attract regional trips daily, thereby increasing the regional VMT. Please see MR-7 (Transportation and Safety) for a response regarding the VMT analysis. The commenter did not substantiate why the locally serving nature of the project is not an appropriate category. The locally serving nature of the park, or even the Sports Complex Alternative, is substantiated by the fact that there is a lack of sports facilities in the eastern part of unincorporated San Diego County. In contrast, a Google search reveals at least one or two parks with sports facilities in the more urbanized communities/cities within the region. Because there are more sports facilities in other parts of the County, it is extremely unlikely that residents/sports leagues of those areas would travel to Alpine for a tournament. The sports facilities provided by the project would serve the local teams within and around Alpine; therefore, the category selected for the analysis is appropriate. The County of San Diego Transportation Study Guidelines, adopted in September 2022 in response to SB 743, provide criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The Transportation Study Guidelines establish the contents and procedures for preparing a Transportation Study for projects in the unincorporated area. The Transportation Study Guidelines aid in determining appropriate mitigation under CEQA, as well

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		as site-specific improvements to the transportation system to accommodate project traffic. No changes to the Draft EIR are needed.
O8-53	Ultimately, the DEIR provides a roundabout, self-serving "analysis" and conclusion of no GHG impacts. (DEIR, p. 4.8-19 [claiming that because the Project is assumed to have less than significant impacts, "mobile-source GHG emissions would not conflict with SB 743," therefore because reducing GHGs from passenger vehicles is a SB 743 objective, operation would not conflict with a 2030 target].)	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.
O8-54	The DEIR also fails to quantify the release of GHG emissions from the loss of open space land that provides carbon capture.[21] The DEIR notes CARB's 2017 goal that "natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target," yet the DEIR fails to disclose or mitigate GHG emissions from loss of 25 acres of grasslands. (DEIR, p 4.8-17.) The DEIR also discloses the creation of area source emissions from 180 days of landscaping each year yet does nothing to mitigate these impacts. (DEIR, p. 4.8-13.)[22]	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.
O8-55	The DEIR's failure to adequately analyze and disclose the Project's GHG impacts misses the opportunity to adopt on-site and in-County GHG mitigation measures, interfering with the County's recently-adopted climate goals, as well as state and regional climate goals.	Please refer to MR-8 (Greenhouse Gases and Energy). The project would be consistent with the goals of the 2017 Scoping Plan, and no additional onsite or in-County mitigation measures would be required. No changes to the Draft EIR are needed.
O8-56	**ii. Energy Impacts** Because energy, GHG impacts, and VMT are interrelated, the DEIR Energy Impacts discussion also improperly avoids any numerical analysis, also pointing to the County's decision to rescind its SB 743 threshold. (DEIR, p. 4.6-11.) Yet "Appendix F of the CEQA Guidelines requires that projects assess the energy impacts of a project when a fair argument can be made that the project will have significant environmental impact." *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 206.	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.

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O8-57	The DEIR fails to demonstrate avoidance of wasteful or inefficient energy use. (DEIR, p. 4.6-12.) First, it is unclear, and unlikely, that these are accurate representations of mobile source consumption if the DEIR continues to characterize the Project as a local-serving park, despite DPR's designation of the park as a "County-wide regional park." (Exhibit D.) The DEIR fails to provide the underlying assumptions for these figures. Further, the DEIR fails to disclose the energy impacts associated with the increased VMT to visit the park, as well as the energy required to ensure adequate water supply and wastewater treatment.	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.
O8-58	The Project avoids a full analysis of the Project's energy impacts by delaying analysis of the water supply (which may require further infrastructure) and wastewater treatment—resulting in the improper piecemealing of the Project's impacts. Relatedly, were the energy impacts associated with the potential sewer extensions (construction and operations) included in this analysis?	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the CEQA analysis, particularly any impacts for both water and sewer services. Please also refer to MR-15 (Water and Wastewater) for more information. Impacts and mitigation measures are discussed in Section 4.19.4.3. Section 4.19.2.1 also discusses the water supply and service boundary of PDMWD. The entirety of PDMWD's potable water supply is imported through SDCWA. Future water demand and supply projections are required to be updated every 5 years with the adoption of a UWMP. PDMWD's 2015 UWMP projects the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including SDCWA, which provided imported water availability and regional water demands and conservation, and SANDAG, which provided the most recent demographic projections (2050 Regional Growth Forecast Update Series 13). Table 4.19-1 shows PDMWD's existing and projected water demand and estimated supply between 2020 and 2040 under normal weather conditions (PDMWD 2016). PDMWD's UWMP is updated every 5 years, at which time the projected supply and demand of potable water resources are reevaluated for the reasonably foreseeable future (i.e., 20-year planning period). **MM-UTIL-1** requires the completion of a water study to assess the capacity of the existing water infrastructure. If new or expanded water facilities would need to occur, the County shall

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		analyze potential environmental effects of the improvement in accordance with CEQA. **MM-UTIL-2** requires the County to confirm water supply availability for development of the project prior to issuance of the building permit. No changes to the Draft EIR are needed.
O8-59	The DEIR also fails to meaningfully analyze the project's consistency with energy plans. The Project claims consistency with CARB's 2017 Scoping Plan, merely because CARB's programs would reduce project-related energy use with no action required at the project level. (DEIR, p. 4.6-15.) The DEIR notes the use of gasoline from visitors, but finds "[e]nergy requirements for fuel use associated with vehicles used for maintenance would go down over time due to improved motor vehicle fuel economy standards. The project does not include any features that would result in excessive long-term operational fuel consumption []. Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary."[23] (DEIR, p. 4.6-14.)	Section 4.6, *Energy*, of the Draft EIR quantified the construction and operational energy uses for the project and compared it County-wide uses. Furthermore, this section analyzed energy consistency with regional plans (Table 4.6-5). As shown in this section, the project would not result in an inefficient, wasteful, or unnecessary use of energy. No changes to the Draft EIR are needed.
O8-60	Preserve Alpine's Heritage would like to commend the DPR on the inclusion of photovoltaic (PVs) and the abstention from use of natural gas. However, the DEIR's deficient analysis results in an inaccurate finding of insignificant impacts and prevents the incorporation of feasible mitigation. The DEIR again cuts corners and avoids meaningful analysis of the Project's impacts from its energy-intensive amenities and creation of mobile source energy consumption as a regional park.	Please refer to MR-8 (Greenhouse Gases and Energy). No changes to the Draft EIR are needed.
O8-61	**iii. Air Quality Impacts** In finding insignificant air quality impacts, the DEIR similarly ignores the Project's plans to draw regional visitors. The Project DEIR admits it would generate criteria pollutants (via construction & operational emissions) of which the County is in nonattainment (DEIR, pp. 4.3-12, 15). Much of these emissions will come from mobile sources and fuel from landscaping.	The air quality thresholds (Screening Level Thresholds) published by the County, and as adopted in the project, are put in place to make sure that a project does not cause an exceedance of the NAAQS or CAAQS. The NAAQS and CAAQS were put in place by the U.S. Environmental Protection Agency and CARB to ensure that sensitive receptors are not exposed to unhealthy air pollution. These standards define the maximum amount of a pollutant averaged over a specified period of time that can be

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		present in outdoor air without any harmful effects on people or the environment. As the project would not exceed these adopted thresholds, the Project is not expected to cause an exceedance of the NAAQS or CAAQS and therefore would not expose sensitive receptors to unhealthy levels of air pollution. No changes to the Draft EIR are needed.
O8-62	As part of determining potentially significant impacts, the DEIR asked whether the Project will conflict with an applicable air quality plan, and found consistency on the grounds that the development is consistent with anticipated growth in the applicable land use plans, because the applicable zoning allows "Community Recreation" uses subject to a Major Use Permit. [24] (DEIR, p. 4.3-20) This does not allow the DEIR to simply assume no conflict and avoid incorporating mitigation measures to reduce emissions from mobile sources and landscaping fuel.[25] (DEIR, p. 4.3-21.) Further, this finding obscures the fact the Park will "attract visitors county-wide." (Exhibit D, p. 4.) The recent Alpine Community Plan Update notes the potential addition of the Project to increase acreage for local parks, but explicitly indicates there are no planned Regional Parks in Alpine. (Draft Alpine Community Plan Update, pp. 71-72.) [26] Therefore, the addition of a Regional Park to Alpine was not considered in the General Plan.	Please refer to MR-8 (Greenhouse Gases and Energy) and the response to comment O8-61. No changes to the Draft EIR are needed.
O8-63	Finally, Preserve Alpine's Heritage requests further clarification on two items. The DEIR lists a Potentially Significant impact from objectionable odors due to the equestrian manure, which it plans to mitigate through a Manure Management Plan that will cover the manure only by a lid or tarp. (MM-AQ-1; DEIR, p. 4.3-25.) Preserve Alpine's Heritage requests analysis and proper mitigation of the potential environmental impacts of stored manure during rain events via overflow and runoff onto surrounding landscape, especially considering the location and sloping of the equestrian staging area. Additionally, the DEIR admits that during operations, the onsite sewer treatment system may "have the potential to generate objectional odors." (DEIR, p. 4.3-25) but does not provide any mitigation. The DEIR	As discussed in Section 4.3, *Air Quality*, the onsite sewer treatment system's septic tanks and leach field lines would be buried underground and would not be a source of odors with proper maintenance and operation. Furthermore, the project would implement **MM-AQ-1**, which would reduce any odor impacts from onsite manure. No further discussion or mitigation is required. No changes to the Draft EIR are needed.

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	must fully disclose and mitigate potential odor impacts from the on-site septic.	
O8-64	**4. Wildfire** The Project is located in a Very High Fire Hazard Severity Zone (VHFHSZ), was directly affected by wildfire in 2018, and is situated in historical major wildlife corridors. (DEIR, pp. 4.9-2 to 3.) Nonetheless, the DEIR claims no increased wildfire risks. (DEIR, p. 4.9-20.) The DEIR improperly bases this conclusion on the existence of outside ordinances and regulations, a Fire and Emergency Operation Assessment (FEOA) prepared by Rohde and Associates that was not included in the DEIR, and incorporation of voluntary measures to avoid declaration of a significant impact. Instead of independently acknowledging the Project's significant impacts to wildfire risks and subsequently discussing mitigating measures to address such impacts, the mitigation measures are characterized in the DEIR as being part of the project. (*Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656.)	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR for information concerning site-specific wildfire and ignition risks associated with the project site.
O8-65	The DEIR states it incorporates information from the FEOA, but does not include the FEOA in the DEIR body, or even attach it as an appendix. (DEIR, pp. 4.9-2; viii [listing the included appendices].) This prevents the public from fully understanding the magnitude of the Project's impacts on wildfire risks. While the DEIR cites the November 2020 FEOA in its references, it does not even provide an URL to access. (DEIR, p. 9-15.) The public is also precluded from analyzing whether the Project is in fact adequately incorporating the FEOA's recommendations.	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR, for information concerning site-specific wildfire and ignition risks associated with the project site.
O8-66	Exclusion of the FEOA report also prevents analysis of whether certain recommendations would have environmental impacts on their own—especially given the sensitive and important biological resources on-site (for example, mechanical treatment, treatment by goat grazing, modification zones, etc.)	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.4, *Biological Resources*, Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.

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O8-67	In finding there are no significant wildfire impacts, the DEIR claims, "County DPR will also implement the recommendations provided in the FEOA prepared by Rohde and Associates," and proceeds to list vague, general recommendations. (DEIR, p. 4.9-22.) No information is provided on the validity of the Project's claims that it will serve as a "Temporary Safe Refuge Area," or ensure safe ingress and egress. (*Ibid*.) Most importantly, **nothing in the DEIR mandates these recommendations**. The FEOA must be incorporated into the DEIR and re-circulated for public review.	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.
O8-68	The DEIR also implies that its designation as VHFHSZ actually improves fire safety, as "in response to this designation" the surrounding fire districts maintain fire prevention regulations. Yet, compliance with applicable fire codes does not obviate the need to analyze existing significant impacts prior to mitigation measures. The Project's location in a VHFHSZ necessitates a full discussion and disclosure of the Project's wildfire risks, as well as inclusion of the FEOA in the DEIR for accurate analysis and adequate mitigation.	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.
O8-69	A "sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact." (*Sierra Club V. Cty. of Fresno* (2018) 6 Cal. 5th 502, 519.) The DEIR only briefly lists the site-specific risks and admits that adding people will increase ignition risk (DEIR, 4.9-3), yet does not adequately disclose or analyze the *magnitude* of the Project's risks given its location and presence of grasslands onsite and on Wright's Fields. Nor does the DEIR disclose how the Project's amenities—especially BBQs—add to this risk. Preserve Alpine's Heritage requests the removal of BBQ pits from the Project design. Simply "banning/taping" them off during Red Flag days (which is also not included as an enforceable mitigation measure) is insufficient. (DEIR, p. 4.9-21.) Further, onsite fire hydrants and water storage tanks should be included in Project design.	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.

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O8-70	The DEIR relies on assurances that an FEOA's recommendations will be implemented—without even including the FEOA in the DEIR, to claim no significant impacts. The DEIR admits construction can cause fires, yet concludes no wildfire impacts due to implementation of BMPs to mitigate, without even including the BMPs as enforceable mitigation measures (*Ibid*.)	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.
O8-71	The DEIR also finds no evacuation impacts, despite the addition of 500 daily visitors on a two-lane, winding road. This conclusion is premised on the TIS finding that the Project would not affect roadway circulation. Yet, the TIS did not appear to analyze freeway mainline segments—major evacuation routes for regional access. (DEIR Vol. II, p. 898; DEIR, p. 4.17-1.) Further, DPR has designated this to be a Regional Park—did the evacuation analysis consider the effect of regional visitors on evacuation times?	Please refer to MR-9 (Wildfire) for information regarding the Alpine Community Park Fire Evacuation Plan to be used by visitors and staff within the project site in the event of an onsite or offsite emergency. Operational analysis using LOS (freeway segments) is not allowed for CEQA transportation analysis per SB 743. Evacuation procedures from the project site would be identical for both regional and all users of the park.
O8-72	The DEIR does not provide adequate analysis of evacuation impacts, only pointing to existing regional plans and its own future plans to prepare a Site Evacuation Plan. This defers analysis and mitigation of evacuation impacts to a later date. Further, the plan will only address evacuation within the boundaries of the Project site. (DEIR, pp. 4.17-14, 4.20-10.) The Project must consider the evacuation impacts on surrounding residents, and not simply rely on a to-be determined evacuation plan that does not extend beyond the boundaries of the Project.	Please refer to MR-9 (Wildfire) for information regarding the Alpine Community Park Fire Evacuation Analysis to be used by visitors and staff within the project site in the event of an onsite or offsite emergency.
O8-73	Finally, the Project claims there will be adequate response times based on the FEOA and Operational Area Emergency Operations Plan. (DEIR, p. 4.20-10.) The DEIR defers analysis of the impacts (via approval by the County Fire Marshall) to after the public review. (DEIR, pp. 4.20-11, 5-31.) Because the FEOA study is not included in the DEIR, the claim of adequate response times cannot be fully analyzed. The public needs to review the underlying assumptions for the FEOA's conclusions (for example, did the FEOS assume all emergency responders are available immediately and not delayed in route to the park?)	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.

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O8-74	Now is the time to review and mitigate potential impacts to response times, evacuation, and ignition risks. The DEIR demonstrates a theme of obscuring full analysis and disclosure of the Project's impacts, relying on outside plans and regulations in finding no impacts, improperly subsuming mitigation measures in the Project (as nonbinding "recommendations"), and deferring analysis until after Project approval.	Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR.
O8-75	**5. Utilities Impacts: Water Supply & Waste Water** While the DEIR admits significant utilities impacts, it avoids full disclosure and mitigation, and relies on improperly deferred mitigation. (DEIR, p. 4.19-14.) The DEIR also improperly piecemeals the Project's water supply and wastewater treatment. An agency improperly "piecemeals" a project when they break it into segments and fail to analyze the whole project in one environmental document, violating CEQA's requirement that a "project" include the "whole of an action." (CEQA Guidelines Section 15378, subd. (a).) When a project contemplates future expansion—such as further water infrastructure—the lead agency is required to review all phases of the project before it is undertaken. (*Nat. Res. Def. Council, Inc. v. City of Los Angeles* (2002) 103 Cal. App. 4th 268, 284, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.)	The Draft EIR provided impacts and mitigation measures for the project area. Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of project implementation in relation to environmental impacts and mitigation measures. The Draft EIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development. Please also refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the CEQA analysis, particularly any impacts for both water and sewer services. Impacts and mitigation measures are discussed in Section 4.19.4.3. Section 4.19.2.1 also discusses the water supply and service boundary of PDMWD. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.
O8-76	**i. Water Supply** An adequate and reliable water supply is crucial to the Project's longevity and operation of the Project, especially as California recently declared a drought in several counties—including San Diego.[27] The DEIR reports anticipated demand of 16.4 million gallons/year. (DEIR, p. 4.1912.) The service boundary of the district water supplier, Padre Dam Municipal Water District (PDMWD), imports its entire potable water supply through San Diego County Water Authority and does not expect to meet demand through 2040 under dry year conditions. (DEIR, p. 4.19-2.) The DEIR shows that during normal conditions, supply will exactly equal demand in coming years. (*Ibid*., Table 4.19-1)	This comment regarding the commenter's concern with the water usage of the proposed park is acknowledged. Please refer to MR-15 (Water and Wastewater) for more information about water supply and resources. The Draft EIR provided impacts and mitigation measures for the project area. Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of project implementation in relation to environmental impacts and mitigation measures. The Draft EIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development. Please also refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the CEQA analysis, particularly

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		any impacts for both water and sewer services. Impacts and mitigation measures are discussed in Section 4.19.4.3. Section 4.19.2.1 also discusses the water supply and service boundary of PDMWD. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The entirety of PDMWD's potable water supply is imported through SDCWA. PDMWD's 2015 UWMP projects the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including SDCWA, which provided imported water availability and regional water demands and conservation, and SANDAG, which provided the most recent demographic projections (2050 Regional Growth Forecast Update Series 13). SANDAG's Series 13 projections were used instead of Series 14 projections to assume the greatest level of future development. Table 4.19-1 shows PDMWD's existing and projected water demand and estimated supply between 2020 and 2040 under normal weather conditions (PDMWD 2016). PDMWD's UWMP is updated every 5 years, at which time the projected supply and demand of potable water resources are reevaluated for the reasonably foreseeable future (i.e., 20-year planning period). The project would require an additional 50.5 acre-feet per year of water; however, water use would be reduced through water conservation measures identified in the UWMP. County DPR also received a water availability letter from PDMWD that confirmed adequate water supply would be available for the project site. Furthermore, the following mitigation measures will be implemented to ensure there would be adequate water supplies for operation of the proposed park during the life of the park. **MM-UTIL-1** requires the completion of a water study to assess the capacity of the existing water infrastructure. If new or expanded water facilities need to occur, the County shall analyze potential environmental effects of the improvement in accordance with CEQA. **MM-UTIL-2** requires the County to confirm water supply availability for development of the project

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		prior to issuance of the building permit. No changes to the Draft EIR are needed.
O8-77	The DEIR acknowledges a potentially significant impact to require new or expanded water facilities, "potentially requiring the relocation or construction of new or expanded water facilities" that could result in physical impacts. (DEIR, p. 4.19-14.) The DEIR claims mitigation under MM-UTIL-1, which simply requires it to complete a Water Study: "[P]rior to issuance of building permit," DPR "shall coordinate" with PDMWD to assess capacity of existing infrastructure that would serve the site, and if insufficient capacity exists, "shall implement the necessary improvements prior to the operation of the project, as determined by PDMWD." If the Project would result in need for new or expanded facilities, DPR shall analyze potential environmental effects of improvements in accordance with CEQA. (DEIR, p. 4.9-16.) This is classic piecemealing: segmenting the Project to avoid review in its entirety. Related water infrastructure requirements must be reviewed in conjunction with the Project—otherwise the Project's impacts are obscured and minimized.	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.
O8-78	The DEIR also acknowledges a potentially significant impact, insufficient longterm water supplies, to serve project during operation. The Project purportedly "mitigates" this by requiring confirmation of water supply prior to the issuance of building permits. (DEIR, p. 4.19-18.)	Please see the response to comment O8-75. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.
O8-79	The California Supreme Court found a similar approach of delaying discussion of locating a water source (and associated impacts) to violate CEQA in *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 430–431. CEQA's "informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to the problem of supplying water to a proposed land use project. Decisionmakers must, under the law, be presented with sufficient facts to 'evaluate the pros and cons of supplying the	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.

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	amount of water that the [project] will need.' Nor can the DEIR mitigate by withholding issuance of building permits absent location of adequate water supply: the DEIR must address the project and assume it will be built." (*Id*. at p. 429.) The Project's water supply (and potential associated impacts) must be disclosed now, so that decisionmakers may make an informed decision on whether to ***approve*** the Project.	
O8-80	**ii. Wastewater** For utilities, the Project proposes to either connect to the existing sewer system or include a septic system to serve the restroom facilities, administration facility/ranger station, and volunteer pad. The DEIR delays analysis of wastewater treatment, another example of improper piecemealing. The DEIR expects the Project to create 3.1 million wastewater gallons per year, nearly all from landscape. (DEIR, p. 4.9-11.) The DEIR should fully analyze and disclose the impacts of the proposed wastewater treatment, especially given the history of site-specific challenges associated with each option.	Please see the response to comment O8-76. Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR for information on the septic system to serve the facilities and wastewater treatment as well as MR-15 (Water and Wastewater). As stated in the Draft EIR, an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the project site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. The existing sewer line is served by SDCSD. An onsite sewage treatment system is the second option for disposal of sewage associated with the project. The system would be in the northern portion of the project site, north of the equestrian staging area. Two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site with a capacity of 1,500 gallons and the other a main tank near the restroom in the northern portion of the project site with a capacity of 15,000 gallons. It is anticipated that the proposed septic system would have a capacity of 5,000 gallons per day. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. The selection of which sewage disposal option is most appropriate for the project will be made as the project proceeds into further detailed development. The sewage option would be required to meet all state and County sewage disposal requirements. No changes to the Draft EIR are needed.
O8-81	To make matters worse, the DEIR admits concerns with the soils supporting the use of septic tanks. The Project is underlain by	See the response to comment O8-80.

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	Bosanko stony clay, rated as "severe" for septic tank effluent disposal due to its low permeability (DEIR, p. 4.7-19.) The Project might include an Onsite Wastewater Treatment System (OSWS) that must conform to Regional Water Quality Control Board standards. Yet, the DEIR improperly defers this analysis as well, simply noting that the County Department of Environmental Health will review the design layout. The site would be evaluated "for a determination of the suitability of onsite soils for the proposed septic system." This is improper deferral of disclosure, analysis, and mitigation of the Project's impacts, especially given the soil's known poor rating for on-site septic, and should be analyzed in the DEIR. The DEIR should be re-circulated to disclose the above concerns.	
O8-82	**6. Visual Resources & Noise Impacts** The Project will markedly change the character and atmosphere of the site and Wright's Field. The rural site displays natural grasslands amidst a backdrop of mountains. Much of the project site is in a Resource Conservation Area (DEIR, p. 4.1-2) and Alpine is a designated Dark Sky Town. The DEIR admits the Project will substantially degrade rural views, and would transform rural, undeveloped land to a complex Regional Park. (DEIR, p. 4.1-14.)	Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR, which describes the visual setting of the project and evaluates the potential impacts from the project on scenic vistas, scenic resources, visual character, and light and glare. It also identifies the existing designated visual resources, including designated scenic views and scenic highways, if applicable, that are visible from within the project site, as well as existing sources of light and glare in the project site and the vicinity. The Draft EIR states Impact-AES-1 and Impact-AES-2 would substantially degrade rural views from public viewpoints during construction and operation. These impacts would be less than significant with the mitigation measures from the Draft EIR as listed below. **MM-AES-1: Install Screening Fences Along the Active Park Boundary.** County DPR or its contractors shall install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing shall extend around the 25-acre active park boundary. The construction fencing shall be installed in phases so as to block views of construction equipment, materials, and ongoing construction activities, but would not block existing views that are available on the site. In this way the construction fencing would not block the entire 25-acre site at any given time. The construction fencing shall remain as long as construction activities are occurring on the project site.

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		MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries. All boundaries of the proposed park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the project. Drought tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, and on the western boundary along Wright's Field Preserve, and on the northern boundary. Please see MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
O8-83	The DEIR claims to mitigate this impact by inclusion of "native vegetation" along project boundaries. (*Ibid*.) Yet, the Project plans for building heights of 15-19 feet. (DEIR, pp. 3-2 to 3-3.) The mitigation measure does little to mitigate the immense change to the site's aesthetic views and rural character. Visual simulations display tall trees (Figure 4.1-3), yet the mitigation measure only vaguely requires "native vegetation." (DEIR, p. 4.1-14.) Further, the DEIR admits the Alternative 2 would result in significant and unavoidable impacts on the visual quality and character of the site due to conversion of the site from undeveloped rural character to a developed site. It is unclear what distinguishes Alternative 2 from the Project besides an increase in size, as Alternative 2 plans to utilize much of the same features. (DEIR, p. 6-2.) Realistically, the mere requirement of native vegetation around the Project site, without any details or design, fails to mitigate substantial impacts to the rural views. Further, the DEIR claims mitigation of impacted nighttime views by turning lights off an hour after closing, and the DEIR reports the Park will close at dusk (p. 1-1), yet the noise mitigation requires quiet hours after 10 pm. (p. ES-21.)	Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR for an analysis of the potential aesthetic impacts of the project. The Draft EIR acknowledges that the project would substantially degrade the existing visual character and quality of public views of the site and its surroundings; however, implementation of mitigation measure **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries** will reduce this impact to a less-than-significant level. Please also see MR-13 (Noise and Lighting) for more information on noise and lighting impacts. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and a discussion of alternative locations "that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines Section 15126.6(f)(2)(BA)). The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. No further response is required. See MR-12 (Parks Master Plan) for details related to all of the sites the County considered prior to purchasing the property. No changes to the Draft EIR are needed.
O8-84	The DEIR also claims to mitigate noise by enforcement of regulations, yet carves out a large exception for use of the PA speaker. (DEIR, p. ES-21) It also contradicts earlier assertions	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.

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	that the park will close by sunset (p. 1-1) in starting quiet hours by 10 pm. (ES-21.)	
O8-85	**7. Cumulative Impacts** The Project's cumulative impacts should be considered in conjunction with the ongoing Alpine Community Plan Update ("CPU"). The DEIR Cumulative Impacts section notes the Alpine CPU, but lacks any description of the Alpine CPU or meaningful analysis. (DEIR, p. 5-2.) The cumulative impacts analysis is further deficient for the reasons detailed above in this letter.	Please see Chapter 5, *Cumulative Impacts*, of the Draft EIR, for information and a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. These impacts will be coordinated with the County of San Diego Planning & Development Services for consideration as part of the Alpine Community Plan update. No changes to the Draft EIR are needed.
O8-86	**C. DPR Improperly Pre-Committed to a Large, Regional, Active Sports Complex at this Location in Violation of CEQA** Under *Save Tara v. City of West Hollywood* (2008) [45] Cal.4th 116, an agency may not commit to a project before environmental review. Yet, there have been statements and reports made indicating that DPR has already decided to construct a large, regional, active sports park at this location. The inadequate environmental review and omission of alternatives indicate this as well.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. This complies with CEQA Guidelines Section 15126.6(c), which states: "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." No changes to the Draft EIR are needed.
O8-87	**III. <u>Approval of the Project Would Violate State planning and Zoning Law</u>** Development decisions must be consistent with applicable General and Community Plans. (Government Code Section 65000 et seq.) Further, CEQA considers land use plan inconsistencies an impact that requires disclosure and analysis. For the reasons detailed above, the Project conflicts with conservation, sustainability, and development policies in the County Plan, the Alpine Community Plan, the Trail Network Plan, and the MSCP Subarea Plan.[29] Mr. Hamilton's letter further details how the Project undermines the MSCP Sub Area Plan. (Exhibit A, p. 15.)	Consistency with the MSCP Subarea Plan is documented in the MSCP Conformance Statement, which is included as Appendix D1 to the RS-Draft EIR.

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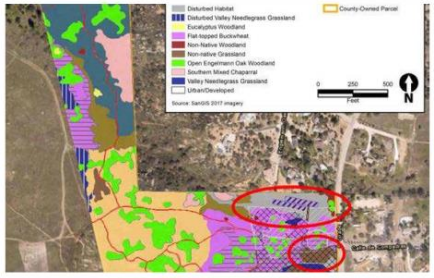
08-88	**IV. <u>Conclusion</u>** In sum, the EIR is legally inadequate and cannot provide a basis for Project approval. Further, the Project is inconsistent with applicable regional policies. For these reasons, Preserve Alpine's Heritage requests denial of the Project as proposed. Thank you for your consideration of these comments.	The commenter's opinion regarding adequacy of the Draft EIR is noted for the record. No changes to the Draft EIR are needed.
08-89	**EXHIBIT A** Dear Ms. Pettit, At your request, Hamilton Biological, Inc., has reviewed a DEIR prepared by the County of San Diego Department of Parks and Recreation (the "County") for the Alpine County Park project (the "proposed project" or "project"). As part of my review, I visited the project site and the adjacent Wright's Field Preserve on November 8, 2021. **Mis-mapped Vegetation Polygons** My visit to the project site took place on November 8, at a time of year when the species composition of grasslands is difficult to accurately evaluate. Although the fall timing of the visit precluded a complete review of the DEIR' s vegetation mapping, I did identify two areas of MSCP Tier I and Tier II communities that were erroneously mapped as Tier III and IV communities. Please refer to the marked-up excerpt from Figure 3 (Vegetation Communities) provided below, followed by Photos 1 and 2 that show the two areas in question.  Excerpt from Figure 3 in the DEIR's Biological Resources Technical Report (Vegetation Communities). The red ellipses show areas mis-mapped as "Disturbed Habitat" (gray polygon in upper ellipse) and as "Non-native Grassland" (brown polygon in lower ellipse).	The County appreciates Hamilton Biological, Inc., for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The County's responses to these specific issues are as follows. **Vegetation mapping**: The County updated its grassland mapping for the County's parcel in the summer of 2022 to confirm all native grasslands were adequately characterized and mapped. Among other changes, the County has integrated a new polygon of Valley needlegrass grassland into its final vegetation map in accordance with Mr. Hamilton's comment. This area is approximately 0.17 acre in size and impacts on this area have been included in the RS-Draft EIR and revised BRR. Mitigation requirements for these impacts have also been adjusted accordingly. During the summer 2022 vegetation verification work, the area mapped as Disturbed Habitat on the north side of the Biological Survey Area was also reviewed. This mapping has been modified to reflect current conditions. In 2019 immediately prior to vegetation mapping, this entire area had been graded and completely cleared of vegetation. A portion of the area mapped as Disturbed in 2019 has recovered to a disturbed flat-topped buckwheat stand and a portion remains within the fuel modification zone currently required by the County Consolidated Fire Code and Alpine FPD Ordinance. The area within the fuel modification zone has been retained as Disturbed due to the repeated grading/clearing that this area experiences. The area that has recovered (i.e., the area outside of the fire fuel modification zone) has been remapped to flat-topped

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	Page 1-14 of the DEIR's Biological Technical Report describes "Disturbed Habitat" as follows: Disturbed habitat supports either no vegetation or a cover of nonnative weedy species that are adapted to a regime of frequent human disturbance. Many of the characteristic species of this habitat are also indicator species of annual grasslands, although disturbed areas tend to be dominated more by forbs than grasses. Characteristic species may include tumblewood [*stet*] (*Sa/sofa tragus*), tocalote (*Centaurea melitensis*), Italian thistle (*Carduus pycnocephalus*), bristly ox-tongue (*Helminthotheca echioides*), and African crown daisy (*Glebionis coronaria*). Disturbed habitat within the BSA consists of dirt roads and multi-use trails. A large stand of disturbed habitat was mapped in the northern portion of the BSA where vegetation has been cleared for safety reasons to minimize wildfire risk, as part of the County's fuel modification efforts. Disturbed areas consist of mostly bare ground or disturbance-adapted species and occur throughout the BSA. Disturbed habitat is not considered a sensitive vegetation community. Photo 1, below, shows the "large stand of disturbed habitat" that the County has cleared for residential fire protection, where leach fields could be installed as part of the proposed project.	buckwheat. Mitigation requirements for these impacts have also been adjusted accordingly.

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	 **Photo 1.** Facing east toward South Grade Road, showing the 0.4-acre area of "Disturbed Habitat" that lies within a residential brush-clearance zone that the DEIR proposes for potential leach fields. Since the vegetation in this areas is predominantly native, and includes only scattered "nonnative weedy species," it should be mapped as disturbed coastal sage scrub. *Photo: Robert A. Hamilton, 17-8-21.* Contrary to the DEIR' s definition of "Disturbed Habitat," the area shown in Photo 1 supports mainly native shrub species, especially Deerweed (*Acmispon glaber*), Broom Baccharis (*Baccharis sarothroides*), California Sagebrush (*Artemisia californica*), California Buckwheat (*Eriogonum fasciculatum*), Saw-toothed Goldenbush (*Hazardia squarrosa* var. *grindelioides*), and California Matchweed (*Gutierrezia californica*). The spaces between these shrubs consists mainly of bare ground and not "a cover of nonnative weedy spe-cies that are adapted to a regime of frequent human disturbance." Therefore, the area does not fit the DEIR' s description of "Disturbed Habitat;" instead, it fits the definition of disturbed coastal sage scrub. Page 1-15 of the DEIR's Biological Technical Report describes Valley Needlegrass Grass-land as follows: Valley needlegrass grassland is a mid-height (to 2 feet) grassland dominated by perennial, tussock-forming purple needle grass (*Stipa pulchra*). Native and introduced annuals	

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	occur between the perennials. A 5- to 10-percent cover threshold of native species indicates it is native grassland. Photo 2, below, shows an area of native Valley Needlegrass Grassland, approximately 0.15 acre in size, mis-mapped as Non-native Grassland in the DEIR.  **Photo 2.** Facing southeast toward South Grade Road, showing approximately 0.15 acre of native Valley Need-legrass Grassland that the project biologists mis-mapped as Non-native Grassland. Each of the tufts of grass is native needlegrass (*Stipa* sp.), providing substantially more than the 5- to 10-percent cover that defines this native grassland community. The polygon's location could be readily ascertained in the field, and in this photo, by its relation to the expansive disturbed area in the background. *Photo: Robert A. Hamilton, 11-8-21.* I request that the project biologists field check all of the vegetation mapping presented in the DEIR and determine whether any additional corrections may be needed. At mini-mum, the EIR' s impact analysis and mitigation measures should be revised to reflect the 0.4-acre polygon of disturbed coastal sage scrub (MSCP Tier II) mis-mapped as Dis-turbed Habitat (Tier IV) in the DEIR and the 0.15-acre polygon of Valley Needlegrass Grassland (Tier I) mis-mapped as Non-native Grassland (Tier III).	
O8-90	**DEIR Fails To Analyze Impacts To The Western Spadefoot** The Western Spadefoot (*Spea hammondii*), is a California Species of Special Concern. It is estimated that this grassland-associated	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** regarding impacts on western spadefoot.

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	toad has been extirpated from 80 percent of its range in southern California due to agricultural expansion and urban development (US Fish and Wildlife Service 2005; Stebbins and McGinnis 2012; Baumberger et al. 2019). On July 11, 2012, a petition to federally list the Western Spadefoot was submitted to the US Fish and Wildlife Service (USFWS), and on June 9, 2015, a 90-day finding was issued stating that the petitioned action may be warranted. The USFWS has been evaluating the petition since 2015, and could issue its decision to either list or not list the Western Spadefoot as threatened or endangered at any time. On February 8, 2019, ICF biologists documented Western Spadefoot eggs on the project site. As reported in ICF's 2018-2019 *Wet and Dry Season Fairy Shrimp Surveys* report (an appendix to the DEIR), the eggs were observed in seasonal pool" AP-007." Given that ICF found this species on the project site, and given that CDFW' s NOP comment letter twice mentioned that Western Spadefoots are known to be present on and around the project site, it is of concern that the DEIR (a) failed to discuss the spadefoot's status and distribution on the project site; (b) identified no potential impacts to this special-status species; and (c) identified no mitigation for potentially significant impacts of the pro-posed project on the Western Spadefoot.	
O8-91	***Western Spadefoot Life History and Ecological Requirements*** A recently published telemetry study of Western Spadefoots in southern California pro-vides important current information on the species' life history and ecological require-ments (Halstead et al. 2021), following on earlier telemetry studies in the same region (Baumberger 2013, Baumberger et al. 2019). <u>Movements of Adult Spadefoots Between Breeding Pools and Aestivation Sites</u> Western Spadefoots spend large parts of the year aestivating underground, often well away from their breeding ponds. As observed by Halstead et al. (2021:1385): The distance that western spadefoots move from breeding pools is a key metric for western spadefoot conservation.	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** regarding impacts on western spadefoot.

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	Distance from the breeding pool indicates how much terrestrial hab-itat around a breeding pool might be used by western spadefoots, and provides a direct link to the effective reserve sizes needed to preserve western spadefoot populations. The need for core terrestrial habitats around amphibian breeding sites is documented (Sem-litsch 1998, Semlitsch and Jensen 2001, Semlitsch and Bodie 2003, Harper et al. 2008, Searcy et al. 2013), as are the negative consequences of roads separating adult habitat from breeding pools (Becker et al. 2007, Brehme et al. 2018). Ensuring that enough terrestrial habitat exists to provide the life cycle needs for western spadefoots is best measured by the predictive distribution of distance from breeding pools. The 95th percentile of the posterior predictive distribution for western spadefoot asymptotic distance from the breeding pool was 486 m at Crystal Cove. This predicted value encompassed the maximum distance from the breeding pool of all but 1 of the spadefoots at the site. Baumberger et al. (2019:6) found: The maximum distance the spadefoots were found from the pools ranged from 16 to 262 m (Table 1, S1 Table), with a mean maximum distance of 69 m ± 61 .48. The spadefoots used a mean of 13 burrows (SD ± 8.5), and the mean distance between burrow locations was 18 m (SD± 24.2). They used 4-31 unique burrow sites (mean 11 ± 7.8) during the study. Nine of the 15 spadefoots (60%) reused one or more burrows at least once after moving to a different burrow. Outside of their aestivation period, the spadefoots shifted their burrow location an average of every 8 ± 7 days, and 147 of 194 (-~76%) movements between burrows were::; ≤25 m. In order to mitigate potential adverse effects associated with development edge upon Western Spadefoots, and to accommodate the movement of the toads between breeding ponds and upland aestivation sites, the USGS (Rochester et al. 2017) recommended that the City of Santee protect an **undeveloped buffer measuring 300 to 400 meters** around	

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	Western Spadefoot breeding ponds. This range is consistent with conservation recom-mendations for the Western Spadefoot contained in the *Recovery Plan for Vernal Pool Eco-systems of California and Southern Oregon* (US Fish and Wildlife Service 2005:11-231): Based on calculations from upland habitat use data analyzed by Semlitsch and Brodie (2003), a minimum conservation area to preserve the ecological processes required for the conser-vation of amphibians may fall within a distance of approximately 368 meters (1,207 feet) from suitable breeding wetlands. Note that even the larger recommended buffer distance of 400 meters falls far short of the 602-meter movement of an adult spadefoot recorded in coastal Orange County (Halstead et al. 2021), and does not encompass the 486-meter distance that represents "the 95th percentile of the posterior predictive distribution for western spadefoot as-ymptotic distance from the breeding pool" in coastal Orange County. Figures 1 and 2, on the following page, show what buffer distances of 300 and 400 meters would look like on the project site.  **Figure 1 (left) and Figure 2 (right).** The yellow circle in Figure 1 represents a 300-m buffer around Western Spadefoot breeding pool AP-007, and the yellow circle in Figure 1 represents a 400-m buffer. These are the minimum and maximum undeveloped buffer distances that the USGS recommended around spadefoot breed-ing ponds in Santee, San Diego County (Rochester et al. 2017). *Aerial Source: Google Earth Pro.*	
O8-92	<u>"Edge Effects" of Development Near Spadefoot Habitats</u> The potential for long-term persistence of Western Spadefoots in a given area relates to the level of nearby urban development, which may be thought of as the accumulation of edge effects and	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** regarding impacts on western spadefoot.

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	other urban impacts. Rochester et al. (2017) discussed several classes of potential adverse effects upon Western Spadefoots that can result from nearby developed areas. Several relevant edge effects potentially associated with the proposed Alpine Regional Park project are discussed in the following paragraphs. **Altered watershed** dynamics resulting from increased impermeable surfaces within the developed areas can result in a more rapid transfer of rain into the aquatic system within the conserved area rather than the gradual accumulation of water as it seeps into the ground and makes its way through the system naturally. Runoff may also contain a higher contaminant load from vehicles, pet waste, and landscape activities. Altered hy-drology can lead to increased sediment transport into the aquatic system, covering egg masses with silt. Spadefoot breeding sites are not typically within flowing drainages, and may not be impacted directly, but contaminants can be carried through the food chain and increased flows can alter the available habitats. **Introduced Argentine Ants** (*Linepithema humile*) frequently extend from the urban edge into the first 200 meters of undeveloped habitat, and where streams and creeks extend into the habitat, Argentine ants may also follow. Argentine Ants have been documented to alter both the native ant community and the overall invertebrate community, and Western Spadefoots feed mostly on insects. If Argentine Ants disrupt the local inverte-brate community, this could impact availability of suitable prey for the Western Spade-foot. Additionally, small Western Spadefoot metamorphs could be vulnerable to attack by the omnivorous Argentine Ant. **Increased outdoor activity** in areas adjacent to the new active park, including hiking and mountain-biking, as well as increased presence of dogs, both on- and off-leash. These uses can prevent Western Spadefoots from using otherwise suitable breeding ponds, can increase sedimentation through disturbance of pools, and can decrease the longevity of seasonal pools (e.g., due to the action of bike tires crossing through pools). Mountain bikes can also cause direct mortality of Western Spadefoot tadpoles by	

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	pass-ing through pools and pushing water and tadpoles out of the pool.	
O8-93	***Impact Analysis for Western Spadefoot*** Grading for Alpine Regional Park would cause direct mortality of aestivating Western Spadefoots, and would permanently remove approximately 23 acres of grasslands and other open habitats that Western Spadefoots use as breeding and aestivation habitats. Edge effects associated with ongoing operation of the park would impact Western Spadefoots in preserved habitats on the project site and in the adjacent Wright's Field Preserve. The proposed loss and degradation of 23 acres of occupied breeding and aesti-vation habitats represent significant impacts to the Western Spadefoot. The Western Spadefoot is not a "covered" species under the MSCP, and therefore the project's significant impacts to this species would not occur within a regional frame-work designed to conserve populations of this species. Thus, the project's impacts to this species are also significant in a cumulative sense.	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** regarding impacts on western spadefoot.
O8-94	***Mitigation for Significant Impacts to the Western Spadefoot*** Given that spadefoot populations require extensive buffering from development edges to remain viable, and no such buffering has been provided for in the project design, the preservation of undeveloped portions DEIR provides no legitimate mitigation for the project's impacts to the Western Spadefoot. In fact, direct and indirect impacts associ-ated with implementation of the Alpine Regional Park project seem likely to result in the extirpation of Western Spadefoots from the adjacent Wright's Field Preserve. Because the Western Spadefoot is not a covered species under the MSCP, the Alpine Re-gional Park DEIR cannot rely upon the MSCP' s habitat tier mitigation ratios to reduce the project's impacts to Western Spadefoots to below the level of significance. Because the County and the EIR preparer failed to so much as mention the Western Spadefoot in the DEIR, despite the species' known presence on the project site, the DEIR' s CEQA analysis is grossly deficient. Furthermore, because the spadefoot is not an	Western spadefoot has been addressed in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** regarding impacts on western spadefoot.

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	MSCP covered species, the tier-based compensatory mitigation strategy laid out in the DEIR fails to address the project's significant impacts to this species. It is unclear how these fundamental omissions can be adequately addressed in the FEIR. The County is encouraged to identify a project alternative that would achieve the most important project objectives without significantly impacting the Western Spadefoot.	
O9-95	**BAT IMPACTS AND MITIGATION** Page 1 of the bat survey report, included as a technical appendix to the DEIR, states: Drew Stokes, San Diego Natural History Museum biologist, conducted active and passive bat surveys within a 92.6-acre parcel (survey area) owned by the County of San Diego. On November 12, 2021, I spoke with Drew Stokes about his surveys, and about the po-tential effects of the proposed project on bats, especially the Pallid Bat. Mr. Stokes stated that he conducted his surveys as a general inventory of the bats that occur on the site, not for the purpose of evaluating the effects of establishing an active park on 23 acres in the southeastern part of the project site. Figure 1 from the DEIR' s Biological Resources Technical Report, reproduced below, shows that no Anabat detection stations were es-tablished in the southern third of the project site, in the native grasslands proposed for removal for the proposed project.	Focused surveys for special-status bat species were conducted within the property, in accordance with prescribed protocol. The Hamilton Biological letter states that there were no Anabat detection stations placed in the southern third of the project site. The Anabat detectors were placed in the highest-quality habitat for special-status bat species, as the bats are rapidly moving and widely ranging species that are not restricted to specific boundaries of vegetation community mapping. Mr. Stokes, the biology specialist, was made aware that the sampling was to be done for purposes of an adjacent active park project, likely in support of an EIR, during the scoping and method development for his survey work. It should be noted that pallid bats were never observed foraging over the northern portion of the proposed Alpine County Park site, despite the presence of a monitoring station within the Engelmann oak stand there. Regardless, pallid bat was assumed to be foraging over the entire County parcel, including all areas proposed for development of the Alpine County Park. Hamilton states,"sampling of the grasslands and other habitats on the project site for large arthropods, which form the main prey base of Pallid Bats, also would have been useful for determining the value of the grasslands and other habitats for Pallid Bat…" All native habitats, including grassland habitat in the southern portion of the site, were assumed to provide habitat for pallid bat in the Draft EIR and impacts on those habitats were calculated accordingly. As such, quantitative impacts on pallid bat habitat were adequately disclosed in the RS-Draft EIR.

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	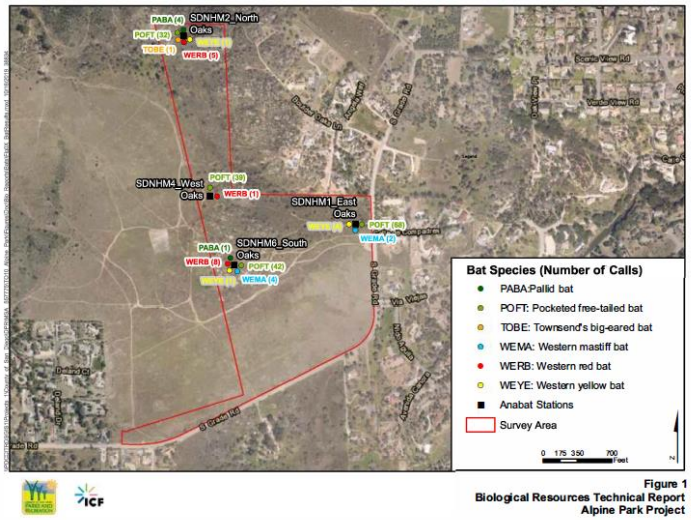 Reproduction of Figure 1 from the Biological Resources Technical Report. Since no Anabat detection stations were established in the southern part of the project site, where the main area of native grasslands are proposed for removal, the project biologists lack baseline data needed to evaluate the project's impacts to bats. In a bat study designed to evaluate the proposed park project, Anabat sampling would have taken place within the main grassland area proposed for impacts. During our con-versation Mr. Stokes suggested that sampling of the grasslands and other habitats on the project site for large arthropods, which form the main prey items of Pallid Bats, also would have been useful for determining the value of the grasslands and other habitats for Pallid Bats. No such sampling was conducted, however. Mr. Stokes found that the project site supports a remarkably high diversity of bats, with his focused surveys recording 15 of the 22 species of bat known from San Diego County. Page 3 of the DEIR' s bat survey report states: The oak woodland and grassland habitats found on the Alpine Park preserve are likely serving as high quality foraging (and	Additional bat surveys were conducted in June 2022 with guidance from Dr. Pat Brown, a well-known bat biologist in California. Two detectors were placed in the grassland areas in the proposed open space and two were placed in the grassland areas within the project site. Results of those surveys have been included in the RS-Draft EIR and BRR. Only one special-status bat species, *Yuma myotis*, was observed. Pallid bat detections were inconclusive in the grassland areas, but possible pallid bat signals were detected in both the proposed impact areas and proposed open space. This information, combined with the vegetation survey data, confirms that there is no appreciable difference in terms of habitat quality in the grasslands in the Biological Survey Area that would preclude pallid bat use of the grasslands in the open space areas over the long term. Based on guidance from Dr. Brown, an additional bat roost avoidance measure has been included in the RS-Draft EIR and BRR (**MM-BIO-8**). This avoidance measure would restrict construction activities during the pupping season within and adjacent to areas where bat roosts may occur.

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	perhaps roosting) habitats for a high diversity of bats including several California species of special concern. Figure 1 from the bat report, reproduced on the previous page of this letter, shows that the greatest numbers of bat detections were recorded at the two southernmost Anabat stations (the area closest to proposed impacts). Although no Anabat sampling was con-ducted in the southern third of the project site, Mr. Stokes stated that he expects that the site's native grasslands represent important habitatt– for bats - especially the Pallid Bats, which is known to forage on the ground in grasslands. Whatever the case, the DEIR does identify potentially significant impacts to the Pallid Bat resulting from the loss of approximately 22 acres of prime foraging habitat located near the last two Pallid Bat roost sites known in San Diego County, as well as fragmentation of the habitat that would not be preserved. The DEIR's treatment of the Pallid Bat warrants scrutiny.	
08-96	***Analysis of Pallid Bat Issues*** The *Management and Monitoring Strategic Plan for Conserved Lands in Western San Diego County: A Strategic Habitat Conservation Roadmap* (San Diego Management and Monitor-ing Program and The Nature Conservancy 2017) - also referred to as the MSP Roadmap - is a comprehensive, landscape-scale adaptive management and monitor-ing framework for prioritized species and vegetation communities in the MSP Roadmap Area (MSPA), which "encompasses the plan areas for the MSCP, MHCP, proposed NCP, and lands immediately to the east of these plan areas up to the watershed divide." By establishing biological goals and measurable objectives across the region, the MSP Roadmap provides for a coordinated effort among multiple key organizations in west-ern San Diego County in the implementation of adaptive management and monitoring actions using the same approach. The MSP Roadmap categorizes and prioritizes plant and animal species, vegetation communities, and threats/ stressors, identifies geo-graphic locations for management and monitoring actions, provides specific timelines for implementation, and establishes a process for coordination and implementation. Un-der the MSP Roadmap,	The Hamilton Biological letter states: "In [Mr. Stokes'] opinion, preserving native grasslands off-site would not mitigate this project's impacts, because the off-site habitat would not be located near one of the two Pallid Bat roost sites known in San Diego County…" Mitigation for pallid bat was determined by working in close coordination with Mr. Stokes, who authored portions of **MM-BIO-5** prior to its inclusion in the Draft EIR. Furthermore, there is other available foraging habitat for pallid bats in the vicinity of the project and the impacts on foraging habitat from the project would be relatively small in comparison to the known available foraging habitat. It is unknown exactly where the pallid bats documented on the project site are roosting. Based on known foraging patterns of pallid bats (CDFW 2022), areas within 0.5 to 1.5 kilometers of a day roost site and less than 3 kilometers of a night roost site could be used as foraging habitat by pallid bat. Using publicly available GIS data (SANDAG 2022b), there are approximately 1,066 acres of native habitats within 1.5 kilometers of the proposed park. Impacts from the project would represent approximately 2 percent of the total available foraging habitat within a 1.5-kilometer radius of the project site.

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	"Category SL" includes "species whose persistence in the MSPA is at high risk of loss without immediate management action above and beyond that of daily maintenance activities." Among the seven special-status bat species detected on the Alpine Regional Park pro-ject site, the DEIR focuses most of its attention on the Pallid Bat (*Antrozous pallidus*). As explained in the Pallid Bat species account in the MSP Roadmap (San Diego Manage-ment and Monitoring Program and The Nature Conservancy 2017): Pallid bats should be managed as a Species Management Focus Category SL Species due to high risk of loss from Conserved Lands in the MSPA and because managing vegetation alone will not ensure its persistence (see Vol. 1, Table 2-4). The pallid bat is at a high risk of loss from the MSPA as it is sensitive to urban development and has been lost from large areas of the MSPA where it occurred in the 1930s and 1940s (Miner and Stokes 2005; Stokes et al. 2005). It is currently known only in very small numbers in 4 MUs, and is at high risk of multiple threats (see Vol. 3, App. 1, Species Profiles). The pallid bat has declined in the MSPA because of habitat loss and fragmentation, especially oak savannahs, native grassland, and open scrub vegetation communities, and because of extermination or disturbance of bat colonies (Miner and Stokes 2005; Stokes et al. 2005). The pallid bat is especially sensitive to urbanization and is extirpated from areas with more than rural development. Bats require multiple roosts with different temperature ranges to accom-modate changing seasonal climate conditions, and these roosts need to be within nightly commute distances to foraging habitat. Bats are vulnerable to destruction of roosts (e.g., con-struction of water projects and transportation routes) or catastrophic events at roosts (e.g., fire, human disturbance) that adversely affect a large number of individuals at once. Recrea-tional activities like cave or mine exploration and rock climbing near roosts can adversely affect reproductive success and survival, and can even cause bat colonies to abandon roosts (Miner and Stokes 2005).	If the Viejas roost site on private property is assumed to be the source for the pallid bats using the project site, then the distance from that roost site to the foraging habitat on the project site is closer to 3 kilometers. Approximately 4,450 acres of native habitat are available for the pallid bats within a 3-kilometer radius of the project site, including approximately 530 acres that are either grassland or Engelmann oak woodlands. These native habitats include privately and publicly conserved lands, including portions of the Cleveland National Forest. Impacts from the project represent only approximately 0.5 percent of the total available foraging habitat within a 3-kilometer radius of the project site and 4.5 percent of the total available oak or grassland habitat within a 3-kilometer radius of the project site. Providing bat boxes within the project site and establishing a colony of pallid bats on site would allow pallid bats to use this foraging habitat while providing the added benefit of having a roost site that is permanently protected from future development. In addition, it is unknown if there are only two roost sites left for pallid bat in San Diego County. Publicly available pallid bat species data in San Diego County (e.g., CNDDB, ECO BIO) include scores of foraging pallid bat occurrences. Most of San Diego County, except high-elevation sites, would be considered potential habitat for pallid bat. As a result, the County is justified in providing habitat-based mitigation for the loss of pallid bat foraging habitat by providing mitigation for impacts on native habitats in accordance with the Biological Mitigation Ordinance. See mitigation measures **MM-BIO-7**, **APM-BIO-1**, and **MM-BIO-9**, in addition to **MM-BIO-8**.

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	Population recovery is slow as bats are relatively long-lived with low productivity. Pallid bats eat large, terrestrial insects, such as Jerusalem crickets and may be impacted by changes to habitat such as invasion of nonnative annual grasses and loss of bare ground (Stokes, pers. comm.). Pesticides can harm bats from ingestion of poisoned prey or by being sprayed inad-vertently at day roosts (Miner and Stokes 2005). A warming and drying climate predicted for the arid southwest could also adversely affect reproduction by reducing surface water avail-able for drinking by lactating bats (Adams and Hayes 2008). A recent study in an arid region of the west showed that lactating female bats visited water to drink 13 times more often than nonreproductive females. Modeling predicts that bat occurrences could decline with increas-ing aridity and warming forecast for the future. Although the DEIR identifies potentially significant impacts to the Pallid Bat, the DEIR fails to mention that the " Pallid Bat is "at a high risk of loss from the MSP A" due to "habitat loss and fragmentation, especially oak savannahs, native grassland, and open scrub vegetation communities." The DEIR' s Pallid Bat mitigation measure, MM-BI0-5, fails to address loss and fragmentation of habitat associated with the proposed project. The DEIR' s impact analysis, provided on page 3-3 of the Biological Resources Technical Report, states: There are only two known pallid bat colony sites in San Diego County (Stokes 2018). The individuals observed during focused bat surveys are believed to belong to the maternal col-ony that roosts in Viejas on a private residence. This species has very specific foraging strategy and utilizes grasslands and open oak woodlands as its main foraging habitat. In addition, this species has characteristics that affect its success with increased urbanization. This includes its tendency to fly at low altitude, its inability to fly over prolonged distances, and its special-ized foraging strategies. As a result of these factors, loss of approximately 22.3 acres of pallid bat foraging habitat would result in a significant impact	

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	on the pallid bat. These significant impacts would be reduced to less-than-significant levels through implementation of MM--BIO-5, which requires the County to construct bat boxes and monitor activities within them for 5 years following installation. The Summary of Significant Impacts provided on page 4.4-32 of the DEIR states: Pallid bat boxes will help attract pallid bats to a permanently protected location in the county (i.e., the open space preserve), where there is a higher chance for long-term reproductive success than in private parcels where long-term persistence of this species is less certain. Potential stress to pallid bat from the loss of foraging habitat on the project site is offset by access to bat boxes providing safe, secure roost sites. During our conversation, Mr. Stokes stated that he considers the loss and fragmentation of native grasslands associated with the proposed project to be a significant impact that cannot be mitigated to a less-than-significant level. In his opinion, preserving native grasslands off-site would not mitigate this project's impacts, because the off-site habitat would not be located near one of the two Pallid Bat roost sites known in San Diego County. The provision of bat boxes specified in MM-BIO-5 represents a speculative form of miti-gation, at best, because roosting habitat cannot substitute for foraging habitat. Further-more, the mitigation measure's five-year time-frame is not commensurate with the pro-posed loss and fragmentation of habitat due to project implementation, which would last in perpetuity. Therefore, the DEIR lacks an adequate foundation to claim that this measure would reduce to a less-than-significant level the project's adverse effects on the Pallid Bat. Since the project's impacts to the Pallid Bat do not appear to be mitigable to a less-than--significant level, the County should identify a project alternative that would achieve the most important project objectives without significantly impacting the Pallid Bat.	

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08-97	**QUINO CHECKERSPOT IMPACTS AND MITIGATION** The DEIR acknowledges that project implementation would remove habitats occupied by the federally listed Quino Checkerspot Butterfly (E*uphydryas editha quino*). To miti-gate this impact, MM-B1O-1 requires the County to "seek a US Fish and Wildlife Service Section 10 Incidental Take Permit (ITP) (or Section 7 Consultation if there is a federal nexus)." It is anticipated that the mitigation: ….. will be provided in the form on on-site preservation of occupied habitat for Qui no check-erspot butterfly within the Alpine Park Preserve, as well as the assurance that no net loss of Quino checkerspot butterfly host plants will occur because of the Project. The County will ensure that there is no net loss of Quino checkerspot butterfly host plants by performing on-site enhancement and restoration activities within Quino checkerspot butterfly habitat, in-cluding planting dot-seed plantain, removing thatch to support healthy populations of dot--seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. The DEIR does not commit to any performance standards demonstrating a positive re-sponse of the local Quino Checkerspot population to proposed habitat restoration and enhancement efforts. The mitigation approach described in MM-BI0-1 is thoroughly ex-perimental and has not proven successful in conserving Quino Checkerspots when im-plemented elsewhere. As summarized by Center for Biological Diversity and Endan-gered Habitats League (2020:22): Indeed, based on a review of all available monitoring reports of enhancement/restoration projects to date, no evidence exists that restoration efforts on such disturbed lands will be effective in sustaining Qui no occupancy (AECOM 2010, 2013, 2015, 2016, 2017; Osborne 2013, 2014, 2015, 2016, 2017; Caltrans 2018; RECON Environmental, Inc. 2018, 2019; San Diego Habitat Conservancy 2019; HELIX Environmental Planning, Inc. 2019). These efforts involve weeding, host plant seeding, and a case of larvae reintroduction (which is not pro-posed here). The reports document no sustained increase	See MR-4 (Natural Resource Mitigation) for additional detail on QCB mitigation. In addition, the QCB mitigation measure has been revised to include the provision requiring confirmation of continued presence of the QCB still occurs within either the County's open space or the adjacent Wright's Field Preserve at the end of the 5-year enhancement/restoration period (**MM-BIO-3**).

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	of carrying capacity beyond base-line levels or the establishment of self-sustaining Quino populations where none existed be-fore. The proposed management measures therefore have no track record of efficacy. Considering that each of these failed efforts to increase Quino Checkerspot populations through habitat restoration was conducted in compliance with an Incidental Take Per-mit or Section 7 consultation with the US Fish and Wildlife Service, the public can have no reasonable expectation that restoring/ enhancing habitat on the project site, under an Incidental Take Permit for the Alpine Regional Park project site as specified in MM-BI0-1, will satisfy the project's CEQA requirement to reduce the project's impacts to a less-than-significant level. In order for MM-BI0-1 to mitigate the project's impacts on the Quino Checkerspot to a less-than-significant level, MM-BI0-1 must specify that the Incidental Take Permit is-sued by the US Fish and Wildlife Service shall require the County to demonstrate the continued presence of the Quino Checkerspot on the project site at the end of the five-year restoration program. If Quino Checkerspots can no longer be found on the site in a normal flight-year at the end of the five-year restoration period, MM-BI0-1 must spec-ify a contingency measure to insure against the project significantly impacting the Quino Checkerspot, such as purchase of a specific off-site parcel that will contribute meaningfully to the species' long-term conservation. Otherwise, the available evidence indicates that implementing MM-BI0-1 is unlikely to reduce the project's impacts to a less-than-significant level. The County could also identify a project alternative that would achieve the most im-portant project objectives without impacting the Quino Checkerspot.	
O8-98	**ENGELMANN OAK PLANTINGS MUST BE CERTIFIED PATHOGEN FREE** *Phytophthora* soil pathogens are known to cause Sudden Oak Death Syndrome and other severe plant diseases. A recent study by Sims and Garbelotto (2021) showed that the planting of	Revisions have been made to the Engelmann oak mitigation measure in the RS-Draft EIR to include this provision (**MM-BIO-2**).

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	native oaks and other native plant species in habitat restoration efforts has repeatedly, if inadvertently, introduced *Phytophthora* soil pathogens into stands of intact oak woodlands and other natural communities near habitat restoration sites, with disas-trous results. As stated by those authors, "The inadvertent introduction of *Phytophthora* species in restoration sites and their spread into adjacent natural ecosystems will surely have long-term environmental and economic impacts." Since such plantings are speci-fied in MM-B1O-3, this represents a potentially significant impact of the project not identified in the DEIR. To avoid potentially significant impacts associated with the possible introduction of *Phytophthora* soil pathogens to the site's preserved Engelmann Oaks, MM-B1O-3 should specifically require that the soil and roots of any and all native plants installed as part of this project be tested and certified to be free of *Phytophthora* prior to planting. To attain this outcome, MM-B1O-3 must specify that all container plants shall be obtained from a native plant nursery that employs Best Management Practices specifically designed to reduce the incidence of *Phytophthora* to undetectable levels (see Sims et al. 2018).	
08-99	**UNSUPPORTED WILDLIFE MOVEMENT FINDINGS** Page 4.4-31 of the DEIR finds that the proposed project "would not result in substantial interference with the movement of any native resident or migratory fish or wildlife spe-cies or with established native resident or migratory wildlife corridors, or impedance of the use of native wildlife nursery sites. Impacts would be less than significant." Since no study of wildlife movement was conducted for the DEIR, the above-quoted finding is based upon the following brief, vague, and conclusory quasi-analysis: The BSA and the adjacent Wright's Field are surrounded by low-density exurban residential development. As such, the BSA and Wright's Field currently function as an "island" of habitat with limited connectivity to open space and other preserve areas. The project would be con-structed at the eastern edge of	See MR-6 (Wildlife Corridors) for additional details on how potential impacts from the project on wildlife connectivity and corridors have been included in the RS-Draft EIR. Additional significant impacts on wildlife movement are not anticipated.

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	this island of open space/preserve, leaving a smaller but simi-larly situated island of habitat to the west of the active park. Figures 3 and 4 on the next page are exhibits showing the project site in relation to the surrounding landscape, both now and in 2003. These figures do not show that the block of natural open space that includes Wright's Field and the project site functions "as an 'island' of habitat with limited connectivity to open space and other preserve areas." Roads and low-density housing undoubtedly constrain wildlife movement to some ex-tent, but the DEIR provides no information on the severity of this constraint. Since no wildlife movement study was conducted for the DEIR, I can say only that the site does not appear to be functionally isolated to the extent claimed in the DEIR.  **Figure 3.** Aerial image showing that existing residential development appears to be sparse enough to allow a variety of wildlife species to move between the project site and the extensive block of natural habitat in the Sweetwater River watershed to the south and east. *Aerial Source: Google Earth Pro.*	

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	 **Figure 4.** Aerial image taken in July 2003 showing that resi-dential development south and east of the project site has changed very little in the past 18 years. *Aerial Source: Google Earth Pro.* This letter includes an historical aerial exhibit from 2003 (Figure 4 on the previous page) because during December of that year the Back Country Land Trust and the County of San Diego Department of Parks and Recreation submitted to the State of California's En-vironmental Enhancement and Mitigation (EEM) Program an application for funding of Phase IV of the Wright's Field Multiple Species Conservation Plan (MSCP) Preserve. Page 5 of the funding application states: ... Wright's Field **functions as an important wildlife corridor** between MSCP lands to the west in Harbison canyon, El Capitan Reservoir and the Oakridge preserve in Crest, and the Cleveland National Forest to the south and east. In particular, two drainages from Wright's Field lead west via Chocolate Creek to El Capitan Reservoir. **These streambed corridors are a vital link for wildlife movement between habitats.** Wildlife access to these streambeds on Wright's Field will be enhanced by the protection of the 142 acre Phase IV parcel,	

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	connecting MSCP preserve lands to the Cleveland National Forest. [emphasis added in bold] Given that the County previously characterized the Alpine Regional Park project site as part of "an important wildlife corridor" and "a vital link for wildlife movement," and since review of aerial imagery suggests that many wildlife species should still be able to move into and out of the project site to the south and east, the DEIR lacks adequate support for the hyperbolic claim that the site currently functions "as an 'island' of habitat with lim-ited connectivity to open space." In the absence of a credible wildlife movement study demonstrating that the project site no longer fulfills wildlife movement functions, a po-tentially significant impact to wildlife movement must be identified.	
O8-100	**PROPOSED PROJECT UNDERMINES THE MSCP** The California Department of Fish and Wildlife (CDFW) is responsible for administer-ing the State of California's Natural Community Conservation Planning (NCCP) pro-gram. The County participates in the NCCP program by implementing its approved Subarea Plan (SAP) for southwestern San Diego County under the Multi-species Con-servation Plan (MSCP). The project site lies within an MSCP-designated Biological Re-source Core Area (BRCA) and a Pre-Approved Mitigation Area (PAMA) because it sat-isfies the following conservation criteria: • Supports high-quality, uncommon habitat that contains biological resources that contribute to the long-term survival of sensitive species. • Has a very high conservation value. • Is within a block of habitat at least 500 acres in size. Citing the presence of numerous special-status species and highly sensitive habitats in a block of habitat designated as PAMA, page 2 of CDFW' s NOP comment letter re-quested that the DEIR "include an alternative location or locations that would meet the needs of the community yet avoid or minimize impacts while not reducing the remain-ing acreage of the large block of habitat encompassing the Wright's Field conservation area." The	Please refer to the revised MSCP Conformance Statement document, provided as Appendix D1 to the RS-Draft EIR, for additional details on how the project is consistent with the MSCP.

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	same letter stated, "The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts." The County ignored CDFW' s requests and moved forward with plans to establish an active regional park on sensitive PAMA lands. The DEIR acknowledges direct impacts to 13.9 acres of native grassland; 4.3 acres of flat-topped buckwheat stands; and 4.1 acres of annual grasslands. In addition, the DEIR states that grading would extend into the root protection zone of up to 25 sensitive Engelmann Oaks (*Quercus engelmannii*; 0.94 acre). This is a minimum of 23.2 acres of sensitive plant communities proposed for direct impacts within a designated PAMA. The DEIR acknowledges these as potentially significant impacts, but concludes that the impacts would be mitigated to below the level of significance through a combination of on-site preservation and purchase of credits and/ or land acquisition. It is relevant that the current Alpine Regional Park project site was evaluated as a po-tential location for a high school in a 2009 Draft Program EIR (DPEIR). In the 2009 DPEIR, the current project site was referred to as" Alternative Site B." On page S- 5 of the 2009 DPEIR, ICF Jones & Stokes reached the following conclusion: Alternative Site B would result in a significant loss of approximately 8.23 acres of native grassland within the MSCP and San Diego County Subarea Plan through development of a core wildlife area within a Pre-Approved Mitigation Area (PAMA). **With implementation of the mitigation measures identified in the EIR, the impact associated with Alternative B would remain significant.** Development of a substantial portion of the PAMA and the result-ing loss of approximately 85 percent of the native grassland located within that PAMA would result in a significant, cumulative impact on the MSCP identified significant loss of approxi-mately 8.23 acres of native grassland within the MSCP and San Diego County Subarea Plan through development of a core wildlife area within a Pre-Approved Mitigation Area (PAMA). [emphasis added in bold]	

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	Thus, even prior to discovery of the federally endangered Quino Checkerspot Butterfly (*Euphydryas editha quino*) in the site's grasslands, the biologists of ICF Jones & Stokes de-termined that the then-proposed loss of **8.23 acres** of native grassland would represent a 11 significant, cumulative impact on the MSCP ... through development of a core wild-life area within a Pre-Approved Mitigation Area (PAMA)." ICF Jones & Stokes also stated the following on page 3.4- 1 of the 2007 DPEIR: The protection of land within the PAMA is important for meeting the goals of the County conservation program and is necessary to obtain permits that allow the loss of some habitat areas by fulfilling the requirements of the federal and state regulations. Page 3.4- 20 of the 2009 DPEIR stated, "11 All impacts on vegetation communities on this site would occur within a PAMA and would, therefore, be inconsistent with the MSCP." On page 2 of a letter dated February 20, 2009, commenting on the 2009 DPEIR, the County concurred with ICF's analysis: Loss of this much grassland habitat would impact the overall function and viability of the grassland including the lands that have already been set aside as preserve with significant expense to the County and community. A significant amount of native grassland, such as at Wright's Field, is a very rare habitat in San Diego County **and any impacts to it would be considered significant.** Since Wright's Field is one of only approximately three remaining areas of significant amounts of intact native grassland in San Diego County, **we agree with the significant and not mitigable finding in the DEIR since in-kind mitigation is probably not be feasible.** [emphasis added in bold] It is agreed that Alternative B would result in a direct and cumulative conflict with the San Diego County MSCP Subarea Plan and would remain significant with implementation of the measures identified in the EIR. Any loss of native grassland habitat will impact the overall function and viability of the	

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	grassland including the lands that have already been preserved with significant expense to the County and community. Additionally, indirect effects associ-ated with lighting, noise, invasive plants from landscaping, and ground moisture changes from irrigation runoff and impervious surfaces would also negatively affect the surrounding natural and preserved areas. From a biological and regional planning perspective Alternative B remains the least preferable of the three alternative sites. When the County and ICF Jones & Stokes made these findings and concurring com-ments in 2009, the endangered Quino Checkerspot Butterfly was considered absent from the site. Although this species' eventual discovery on the site has provided even greater ecological justification for preserving the site's grasslands, the County and ICF now conclude that the loss of 13.9 acres of native grassland within PAMA (a loss 69% greater than that proposed in 2009), along with the project's other significant impacts to sensitive biological resources, should be deemed consistent with the MSCP. What caused the County to change their previous analysis? On what basis did the County conclude that in-kind mitigation was "probably not feasible" in 2009, but definitely fea-sible in 2021? In 2009, the County stated, "Any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands that have already been pre-served with significant expense to the County and community." The County now con-cludes that 13.9 acres of native grasslands, and 9.3 acres of other sensitive communities, can be developed within this PAMA, and that the associated significant impacts to sen-sitive biological resources can be reduced to below significance by preserving part of the project site, putting up bat boxes, managing habitats, and acquiring 11.7 acres of Tier 1 habitats off-site. Furthermore, as discussed in this letter, the mitigation measures identified in the DEIR do not adequately address the project's significant impacts to (a) the Western Spadefoot, a species not covered under the MSCP that the DEIR fails to acknowledge as occurring on the site; (b) the Pallid Bat, a	

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	species "at a high risk of loss from the MSPA" due to removal and fragmentation of its foraging habitat; or (c) the Quino Checkerspot, a federally endangered species notoriously resistant to increasing its numbers in response to habitat restoration efforts. As previously acknowledged the County and ICF Jones & Stokes, and for additional reasons discussed in this letter, the proposed establishment of an active park within sensitive grassland, coastal sage scrub, and Engelmann Oak woodland habitats desig-nated as PAMA - on land the County characterized in 2003 as an "an important wild-life corridor" and a "vital link for wildlife movement" - would undermine the ability of CDFW and the County to achieve the regional conservation goals of the MSCP pro-gram.	
O8-101	**ALTERNATE LOCATION ALTERNATIVE REJECTED WITH INADEQUATE CAUSE** As described on Page 6-4 of the DEIR, the Alternate Location Alternative "would relo-cate the amenities proposed for the park to several 'mini-parks' that would be located throughout Alpine instead of within one consolidated location." In a letter commenting on the NOP, dated April 2, 2021, local resident Anne Falasco Norton wrote: In addition, at last week's ACPG meeting I offered an alternative location for many of the Project's activities that are not suitable to the Project's location: Alpine Elementary School (AES) in the heart of Alpine. It is an historical site sitting idle and empty. This site could be the perfect fit with regards to providing the activities in the park (the skateboard and bike parks, the playing fields, the community garden and the dog park) that ought to be clustered within the higher populated area of Alpine. This higher populated area is our village center. If designed properly, AES could become a stalwart example of incorporating historical value with the present needs of our community. AES already has the infrastructure. It has playing fields. It has reasonable off-street parking. It has existing electrical, water and sewage hookups. It addresses the traffic flow. Fields could be lighted without causing light pollution.	CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Chapter 6, *Alternatives*, of the Draft EIR provides a reasonable range of alternatives to the project. Additionally, the Draft EIR describes two alternatives that were considered but rejected including the Alternate Location Alternative. The reason the Alternate Location Alternative was determined to be not feasible is provided in Chapter 6, *Alternatives*. Please also see MR-12 (Parks Master Plan) for additional details. Information regarding joint use agreements has been provided. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. This comment will be shared with the Board of Supervisors to inform its decision. No changes to the Draft EIR are needed.

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	Situated at the school, in the heart of town, the bike, skate and dog parks would not cause noise pollution. This is the location where these types of activities belong and are best served. This alternative should be analyzed in the EIR. Another alternative park site in the heart of Alpine is the old Alpine School District's offices which also has similar amenities that are suitable for the active portion of the Project. This alternative should be analyzed in the EIR. Given the range of environmental impacts associated with the Proposed Project that cannot be mitigated to a less-than-significant level, this type of creative solution is sorely needed. Rather than conducting a legitimate analysis of this alternative, however, page 6-5 of the DEIR dismisses it out of hand: This alternative was rejected because it would not meet many of the project objectives, in-cluding creating a place where all Alpine residents can gather and connect as a community. This alternative also would not enable long-term natural and cultural resources management. Furthermore, this alternative does not meet the CEQA standard as being a "feasible" alterna-tive given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reason-able period of time. On page 3-1 of the DEIR, Project Description, the first Project Objective listed is "To cre-ate a place where all Alpine residents can gather and connect as a community." The County cites failure of the Alternate Location Alternative to achieve this Project Objec-tive as the first reason for dismissing this alternative. But would the Proposed Project itself create "a place where all Alpine residents can gather and connect"? Page 3 of the County's *Multiple Species Conservation Program Conformance Statement*, pro-vided in Volume 2 of the DEIR, states: Operation of the proposed project would be expected to serve regional residents and visitors and is anticipated to have an average daily use of 500 people. The sewer system would be	

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	designed for peak park use (a maximum of 1,000 people which is only anticipated up to twice a year). Acknowledgment that the Proposed Project would be "expected to serve regional resi-dents and visitors" contradicts the County's claim that the Proposed Project is focused on "creating a place where all Alpine residents can gather and connect." The Conform-ance Statement goes on to indicate that the Proposed Project would serve an average of 500 people per day, and a maximum of 1,000 people two days per year. Since the popu-lation of Alpine sits at approximately 15,000[1], these daily use figures represent approxi-mately 3 to 7 percent of the population of Alpine. Thus, even if park attendance were limited to only Alpine residents, 93-97% of the population of Alpine would be excluded Of course, since Alpine Regional Park would be "expected to serve regional residents and visitors," many park users would not be Alpine residents. The approach of creating multiple "mini-parks" appears to be better suited to meeting the local recreation needs of Alpine residents, consistent with the stated Project Objectives, compared with the proposed project's vision of a large, centralized recreation center designed to draw in visitors from the wider region. The DEIR continues: "This alternative also would not enable long-term natural and cul-tural resources management." The Proposed Project would be sited within PAMA, and constructing and operating the park would impact the Quino Checkerspot, Western Spadefoot, and Pallid Bat, as well as disrupting local wildlife movement patterns. As discussed in this letter, the mitigation measures identified in the DEIR would not miti-gate these impacts to a less-than-significant level. Under the Alternate Location Alterna-tive, there would be no need to establish an on-site resource manager, because the spe-cial-status species that currently exist on the site would be able to persist there without the management actions identified in the DEIR. The DEIR concludes that the Alternate Location Alternative "does not meet the CEQA standard as being a 'feasible' alternative given that the County does not own other properties	

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	in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time." The County has not explained why the project site itself represents a feasible location for a large, active regional park. As reviewed in this letter, the County in 2003 described the project site as part of "an important wildlife corridor" and "a vital link for wildlife movement," but now the County dismisses the site as part of an "island" of open space with only "lim-ited connectivity to open space and other preserve areas." In 2009, the County strin-gently opposed a high school project that proposed removing a smaller area of native grassland than the County now proposes to remove for Alpine Regional Park. The DEIR does not provide new information indicating that the resource value of the site has declined in the years since the County made these evaluations. In fact, the recent discovery of endangered Quino Checkerspots on the site and Wright's Field only in-creased the area's importance as a natural habitat. Ms. Norton's NOP comment letter recommended consideration of two shuttered public facilities: the Alpine Elementary School property and the Alpine School District's of-fices. Although the closed facilities are not County-owned, public agencies routinely co-operate to arrive at creative solutions to serve the public. The DEIR gives no indication that the County made any effort to work with the Alpine Unified School District to eval-uate the feasibility of repurposing one or both of these public facilities to provide recre-ational opportunities to the residents of Alpine. Until the County makes a good-faith ef-fort to find venues that can fulfill the legitimate objectives of the proposed project with less damage to the environment, the DEIR' s alternatives analysis must be considered in-adequate.	
O8-102	**REVIEW OF MSCP CONFORMANCE STATEMENT** I reviewed the *MSCP Conformance Statement*, dated September 2021 and attributed to the County Department of Parks and Recreation, which is included within Volume 2 of the DEIR. **Page 4 of the Conformance Statement** states:	The comments provided by Mr. Hamilton in his review of the MSCP Conformance Statement have been addressed elsewhere in the responses to comments above. In addition, the MSCP Conformance Statement has been revised to reflect the changes in the BRR and Section 4.4, *Biological Resources*, of the RS-Draft EIR. No additional response to this comment is necessary.

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	Implementation of a septic system and associated leach field to accommodate sewage from the proposed restroom facilities could result in up to 0.4 acres of additional permanent im-pacts on disturbed habitat. As documented on page 2 of this letter, the proposed septic system/leach field would be established in an area of disturbed coastal sage scrub (MSCP Tier II habitat) and not "Disturbed Habitat" as defined and used in the DEIR (MSCP Tier IV habitat). **Page 6 of the Conformance Statement** acknowledges the project's significant impacts to the federally listed Quino Checkerspot Butterfly. Page 10 asserts, "The Section 10 spe-cies permitting process would ensure that there is no reduced likelihood of recovery of Quino checkerspot butterfly." As discussed on pages 11-12 of this letter, the DEIR does not commit to a performance standard requiring that the local Quino Checkerspot pop-ulation show a positive response to the proposed habitat restoration and enhancement efforts. Previous habitat restoration and enhancement efforts undertaken under federal Incidental Take Permits have failed to result in increased Quino Checkerspot popula-tions. Unless the Incidental Take Permit for this project includes a requirement that Quino Checkerspots be detectable on the project site in a normal flight-year at the end of the five-year restoration period, the available evidence indicates that implementing MM-BI0-1 is unlikely to reduce the project's impacts to a less-than-significant level. **Page 9 of the Conformance Statement** states that significant impacts to foraging habitat used by the Pallid Bat "would be reduced to less-than-significant levels through imple-mentation of MM-BI0-5, which requires the County to construct bat boxes and monitor activities within them for 5 years following installation." As discussed on pages 8-11 of this letter, the provision of bat boxes cannot be expected to mitigate for the loss and fragmentation of a large area of prime Pallid Bat foraging habitat located near this spe-cies' two remaining roosts known in San Diego County. The Conformance Statement fails to mention the occurrence of Western Spadefoots on the project site. Although the spadefoot	

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	is not a covered species under the MSCP, it is a declining special-status species that would experience significant adverse effects if the proposed project is implemented. **Page 5 of the Conformance Statement**: The impact and preservation acreages presented in Table 1 should be adjusted to reflect the mis-mapped areas discussed on pages 1-4 of this letter. It is requested that the project biologists re-check the rest of the project site to determine whether any other areas were mapped incorrectly. **Page 5 of the Conformance Statement** states, "The Project area is also directly adjacent to a busy arterial road, South Grade Road, that already limits wildlife movement in the area to the south and east." South Grade Road is a two-lane collector, not an arterial road, and cannot be accurately described as "busy." The DEIR provides no evidence that this road "already limits wildlife movement in the area to the south and east." **Page 12 of the Conformance Statement** states: The BSA and the adjacent Wright's Field are surrounded by low-density exurban residential development, which result in an "island" of habitat with limited connectivity to open space and other preserve areas. As discussed previously in this letter, the DEIR presents no wildlife movement study data, or other convincing analysis, to substantiate its claims that wildlife movement through the project site and surrounding areas is greatly limited by existing low-density development. The County itself described the project site as being part of "an important wildlife corridor" and "a vital link for wildlife movement" in 2003, and conditions on the ground have not changed much since that time (see Figures 3 and 4 on page 14 of this letter). **Page 12 of the Conformance Statement** continues: The conversion of a maximum of 22.3 acres of native habitat to a developed park facility would not constrain wildlife movement, because the park would be located adjacent to ex-isting development on three sides ... No features would be	

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	constructed which would impinge any movement areas, including ridgelines or canyons. The proposed landscaped berm along South Grade Road, which would be as much as 12 feet higher than the roadway, is a feature that could potentially impinge upon the movement of wildlife into and out of the project site across South Grade Road. **Page 15 of the Conformance Statement** states: To mitigate for potentially significant impacts on Tier I, Tier 11, and Tier Ill habitats, the County DPR will provide compensatory mitigation consistent with the BMO to reduce significant impacts on sensitive vegetation communities. The Quino Checkerspot and Western Spadefoot are not covered species under the MSCP. As discussed in this letter, the project's potentially significant impacts to habitats occupied by these species would not be reduced to less-than-significant levels through the DEIR' s tier-based compensatory mitigation approach. **Page 16 of the Conformance Statement** presents *Findings of Conformance*, which rely upon several unsupported assertions to conclude that the proposed project qualifies as an "essential public project." Contrary to the *Findings of Conformance*, the proposed pro-ject conflicts with the following goals of the County's General Plan: • Maintenance of the County's Rural Character (GOAL LU-2) encouraging conserva-tion and enhancement of the unincorporated County's varied communities, rural setting, and character. The proposed project would remove approximately 22 acres of sensitive natural com-munities in order to establish an active regional park in a rural setting. • Sustainability of the Natural Environment (GOAL COS-2) sustaining ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.	

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	The DEIR does not demonstrate the project's consistency with GOAL COS-2. By remov-ing 22 acres of sensitive natural communities, fragmenting the remaining habitat, and bringing large numbers of people into this sensitive area, project implementation would threaten the long-term (and short-term) viability of populations of at least three special-status species known from the site and adjacent Wright's Field Preserve: the Quino Checkerspot Butterfly, Western Spadefoot Toad, and Pallid Bat. • Recreational Opportunities in Preserves (GOAL COS-23) promoting the ac-quisition, monitoring, and management of valuable natural and cultural re-sources where public recreational opportunities are compatible with the preservation of those resources. The proposed active park is not compatible with preservation of the site's sensitive nat-ural resources. As reviewed in this letter, the County acknowledged this fundamental incompatibility in its comments on the 2009 DPEIR for the proposed High School No. 12 on this same property, which stated, among other things: It is agreed that [the high school project] would result in a direct and cumulative conflict with the San Diego County MSCP Subarea Plan and would remain significant with implementation of the measures identified in the EIR. Any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands that have already been preserved with significant expense to the County and community. Additionally, indirect ef-fects associated with lighting, noise, invasive plants from landscaping, and ground moisture changes from irrigation runoff and impervious surfaces would also negatively affect the sur-rounding natural and preserved areas. **Page 17 of the Conformance Statement** asserts the following: All feasible mitigation measures have been incorporated into the Project, and there are no feasible, less environmentally damaging locations, alignments or non-structural alternatives that would meet Project objectives.	

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	As discussed on pages 18-20 of this letter, the DEIR' s alternatives analysis provides in-adequate justification for failing to evaluate the Alternate Location Alternative, which could potentially achieve the main project objectives with far fewer adverse effects on sensitive natural resources.	
O8-103	**SUMMARY AND CONCLUSION** Plant community mapping presented in the DEIR should be field-checked for accuracy and analyses presented in the FEIR should reflect the corrected mapping. The DEIR fails to evaluate the project's adverse effects to the Western Spadefoot, a spe-cial-status species known to be present on the site. The DEIR' s tier-based compensatory mitigation strategy fails to address the project's significant impacts to this species. It is unclear how these fundamental omissions can be adequately addressed in the FEIR. The mitigation measures identified to address potentially significant impacts to two other species, the Quino Checkerspot Butterfly and Pallid Bat, are flawed and inade-quate, and do not provide reasonable assurance that their implementation will reduce impacts to these species to a less-than-significant level. As previously acknowledged by the County, and for additional reasons discussed in this letter, establishing an active park within sensitive grassland, coastal sage scrub, and Engelmann Oak woodland habitats designated as PAMA, and impinging upon poten-tial wildlife movement linkages, would undermine the ability of CDFW and the County to achieve the regional conservation goals of the MSCP program. The *MSCP Conformance Statement* provided in Volume 2 recapitulates many of the defi-ciencies contained in the DEIR, as needed to determine that the project conforms to the requirements of the MSCP. The statement includes *Findings of Conformance* that rely upon several unsupported assertions to conclude that the proposed project qualifies as an" essential public project." Issuing a DEIR that flatly contradicts the County's own previous evaluations of the pro-ject site's high ecological values - without	This is a summary comment and does not contain any new, substantive comments. All of these comments have been addressed in responses provided above. No further response is required and no changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	citing any new biological data –to justify the new appraisal - erodes the County's credibility and trustworthiness, and reduces pub-lic confidence in the integrity of the CEQA process. When the County assures local resi-dents that this active park will never be subject to environmentally damaging night-lighting, or that extending a sewer line to the new park will not lead to future increases in rural housing density because new houses would not be allowed to hook up to the new sewer line, why should these assurances be believed? Once the basic park facilities have been established, the County could change its mind again and determine that in-cremental increases in impacts would be less than significant. Establishing credibility and trust, and engendering public confidence in the legitimacy of CEQA analyses, are important reasons for the County to refrain from arbitrarily contradicting itself on cru-cial planning issues.	
O8-104	I appreciate the opportunity to provide these comments on the DEIR and I look forward to the County's responses. If you have questions, please call me at (562) 477-2181 or send e-mail to robb@hamiltonbiological.com.	The County appreciates Hamilton Biological, Inc., for submitting comments on the Draft EIR. No changes to the Draft EIR are needed.
O8-105	**Literature Cited** (Page 55 to Page 56)	This comment refers to the cited references for Hamilton Biological, Inc., comments. No further response is required. No changes to the Draft EIR are needed.
O8-106	**EXHIBIT B** Robert A. Hamilton C.V (Page 57 to 64)	The curriculum vitae for Robert Hamilton is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-107	**EXHIBIT C** Tom Brohard, P.E., has reviewed the September 2021 Draft Environmental Impact Report (Draft EIR), the Concept Plan, and the July 2020 Transportation Impact Study (TIS) for the Proposed Alpine County Park Project within the unincorporated community of Alpine in San Diego County. The Proposed Project includes 24 acres of active park uses on the west and north sides of South Grade Road. Facilities and amenities include a baseball field, soccer fields, skate park, bike skills area, dog park, basketball and pickleball courts, playground, fitness stations,	The County appreciates Tom Brohard, for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.

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	equestrian staging area with corral, community garden, picnic areas with shade structures, picnic tables, and multi-use trails.	
O8-108	In my over 50-years of traffic engineering and transportation planning experience, I believe that this is one of the worst Transportation Impact Studies whose unsupported conclusions and recommendations were then carried forward into the Draft Environmental Impact Report.	This comment is acknowledged. This comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
O8-109	A linear parking lot with about 250 parking spaces is proposed along both sides of a two-way driveway that accesses South Grade Road at each end. The maximum parking demand must be calculated, and provisions must be added (such as event scheduling) to contain all parking within the site so it does not overflow the park onto South Grade Road or into the adjacent residential areas. No parkway or roadway improvements such as sidewalks for pedestrians, lanes for bicyclists, or turning lanes for vehicles on South Grade Road are shown on the Concept Plan or described in any of the documents.	This comment does not substantiate why the maximum parking demand must be calculated. Parking is not a CEQA requirement. The onsite parking lot would include up to 240 spaces to accommodate local use. Any large event would be required to obtain a daytime use permit with County DPR. The County has the right to reject events that exceed the capacity of the park. Park capacity for special events is published on the County's website. Please see MR-7 (Transportation and Safety) for additional information on roadway improvements at the project frontage. No changes to the Draft EIR are needed.
O8-110	My review disclosed that the lack of sidewalks, bicycle lanes, and turning lanes on South Grade Road will compromise traffic safety for users of the proposed park and for those passing by. Physical infrastructure improvements must be thoroughly studied now and implemented with the Project. This letter points out inconsistencies and conflicts among the various documents and recommends that these items be resolved. Implementing recommendations in the documents to install unwarranted multi-way STOP controls 700 feet apart on high-speed South Grade Road where stopping sight distance is inadequate will significantly increase the potential for numerous severe injuries and/or fatal traffic collisions, some involving pedestrians.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
O8-111	**<u>Education and Experience</u>** Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as	This comment is acknowledged. This comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

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	a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served sixteen diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a brief summary of my experience in the enclosed resume.	
O8-112	**South Grade Road Conditions** Google Earth photography dated June 2019 shows that South Grade Road adjacent to the Proposed Park is comprised of an 11' travel lane with a 2' wide asphalt shoulder in each direction. Comment: Development of this park or any other project on this site must be required to provide street improvements as called out by the County of San Diego Department of Public Works (DPW) for the entire frontage of the project, plus adequate transitions, and tapers to join existing improvements to the north and west. The existing travel lanes are separated by a double yellow centerline which prohibits passing and the narrow shoulders are delineated by a 4" wide white edge stripe. Comment: The need for left turn lanes for traffic entering at the park access points as well as for acceleration and deceleration lanes must be evaluated and incorporated into the park project. The roadway contains a horizontal curve as the alignment changes from north/south to east/west approximately midway adjacent to the park site. The curve is posted in both directions with 90-degree curve warning signs and advisory 30 MPH speed plates. North of the curve, the regulatory posted speed limit is 40 MPH, and it is 45 MPH south of the curve. Comment: Improvements to South Grade Road must be designed in accordance with sight distance requirements for the design speeds on the roadway, 10 MPH above existing posted speed limits of 40 and 45 MPH.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
O8-113	**Alternate Modes of Transportation**	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and

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	Page 4.17-2 of the Draft EIR states "The closest bus stop is approximately 0.88 miles north of the project site." Comment: With this condition and without any sidewalk improvements, no park users can be expected to use public transportation to reach the closest bus stop and then walk to or from the Proposed Park. Page 4.17-2 of the Draft EIR states "There are no bike facilities along South Grade Road adjacent to the project site. All County roadways are open for travel by bicycle regardless of bikeway treatment." Comment: With narrow shoulders and traffic speeds of many vehicles on South Grade Road likely exceeding the posted speed limits of 40 and 45 MPH, it is unsafe for even an experienced bicycle rider to use South Grade Road to and from the park. While the heading in the Draft EIR on Page 4.17-2 indicates "Pedestrian and Bicycle Facilities"; the total lack of all pedestrian facilities is not mentioned or discussed. The Concept Plan indicates that the park facilities will be separated from South Grade Road by a "bermed landscape screen." Page 4.17-9 of the Draft EIR states "The project includes improvements to circulation facilities including a decomposed granite walking path situated between the proposed berm and South Grade Road ... " Comment: This walking path is not shown on the Concept Plan. Either a sidewalk within the public right of way or a walking path within the park should be provided to improve pedestrian safety.	safety, and project access. No changes to the Draft EIR are needed.
O8-114	**Project Access Considerations** Page 4.17-12 of the Draft EIR states "The project would involve two ingress/egress driveways providing access to the parking and staging areas within the park from South Grade Road. As part of the standard project approval process, the proposed access improvements would be reviewed by the County Department of Public Works (DPW) for safety and sight distance standards. Upon review of the improvements, County DPW would either approve the plans or provide specific	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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	recommendations for improving the safety of the proposed ingress/egress. County DPR would comply with all recommendations of County DPW." Comment: Now is the time to evaluate basic traffic engineering requirements and conditions at the access points such as stopping sight distance as well as the need for left turn lanes. The TIS should have evaluated these items but failed to do so. Relying on DPW to catch design oversights during the plan review process is not appropriate.	
O8-115	Page 4.17-12 of the Draft EIR states "Based on the queuing analysis, the vehicle queues at the project driveways and South Grade Road are expected to fit within the existing storage and would not impede traffic at the driveway or the adjacent roadway system." Comment: Without any improvements such as separate left turn lanes on South Grade Road at the project access driveways, eastbound and northbound vehicles will be required to wait in the high speed through lane until opposing traffic passes. This condition creates significant safety issues, particularly if the vehicle at the northern vehicle park access is a slow-moving pick-up truck hauling a horse trailer and waiting to access the equestrian facilities.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
O8-116	In discussing the park access at Calle de Compadres, Page 4.17-13 of the Draft EIR states" ... the intersection does not meet the minimum peak hour volumes for an all-way stop controlled intersection ... The intersection at Calle de Compadres will operate with an all-way stop controlled intersection." Comment: From Google Earth photographs, Calle de Compadres provides access to six properties east of South Grade Road. The west leg will provide primary access to the park, serving about 250 vehicle trips a day in and out. To be effective by commanding respect of motorists as an all-way stop, traffic volumes on South Grade Road should be about equal to those at the park/Calle de Compadres. Multi-way stop control is not warranted at this intersection as the traffic volumes on South	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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	Grade Road are many times greater than on the cross streets. The TIS and Draft EIR should not propose multi-way Stop control if warrants are not satisfied. Installing unwarranted multi-way stop control will create more serious traffic collisions than would otherwise occur, especially when installed at locations with high vehicle speeds on the major roadway.	
O8-117	In discussing the park access at Calle de Compadres, Page iii as well as multiple other pages in the TIS state " ... the intersection does not meet the minimum peak hour volumes for an all-way stop controlled intersection. However, due to a number of pedestrian collisions occurring in the vicinity of this intersection, and since the project driveway at this intersection is considered an important and integral safety design feature of the Proposed Project, it is suggested that this intersection be converted to an all-way stop-controlled intersection with implementation of the Alpine Community,. Park. All-way stop controls would provide for an enhanced pedestrian safety route from the residential neighborhood on the east si of South Grade Road to the park as well as reduce the potential severity conflict between pedestrians and motorists." Comment: The TIS has not disclosed or analyzed the "number of pedestrian collisions occurring in the vicinity of this intersection." There are no sidewalks in the vicinity of this intersection or on any of the other residential side streets that could channelize pedestrians to a single crossing point. Only six homes are served by Calle de Compadres, and other unconnected residential streets are further away. Unwarranted multi-way stops on this high-speed road with highly unbalanced intersection traffic volumes defies proper traffic engineering judgement and rationale. All-way stop controls would not provide for an enhanced pedestrian safety route from the residential neighborhood on the east side of South Grade Road to the park. Furthermore, the severe conflict between pedestrians and motorists would be increased and not reduced as stated in the TIS.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
O8-118	In discussing the intersection of South Grade Road and Via Viejas, Page 37 of the TIS states " ... the intersection does not	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and

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	meet the minimum peak hour volumes for an all-way stop controlled intersection. However, due to the high pedestrian volumes that the Alpine Community Park is anticipated to generate, it is recommended to convert the intersection to an all-way stop controlled intersection to control vehicle/pedestrian conflicts... It is important to note that "STOP AHEAD" signs are recommended to be installed on the south leg of the intersection as the stopping sight distance at this approach is not met (360 feet required)." Comment: First, no vehicle or pedestrian access through the landscaped berm in the park to South Grade Road opposite Via Viejas is proposed in the Concept Plan. The TIS has not forecast the number of pedestrian crossings between the park and Via Viejas in order to properly determine if stop signs on South Grade Road would be warranted based upon pedestrian crossings. I believe few pedestrians will cross as there are no sidewalks on any of the residential side streets to the east. Providing an unwarranted multi-way stop on a high-speed road where motorists may not believe there is a legitimate reason to stop and where there is inadequate stopping sight distance defies proper traffic engineering judgement and rationale. If implemented, multi-way stop control on South Grade Road at Via Viejas will create unsafe conditions. All-way stop controls would not provide for an enhanced pedestrian safety route from the residential neighborhood on the east side of South Grade Road to the park. Furthermore, the potential severe conflict between pedestrians and motorists would be increased and not reduced as stated in the TIS.	safety, and project access. No changes to the Draft EIR are needed.
O8-119	In summary, further study must be made to properly address the numerous comments in this letter. Following recommendations to install unwarranted multi-way STOP controls 700 feet apart on high-speed South Grade Road where stopping sight distance is inadequate will significantly increase the potential for numerous serious injury and/or fatal traffic collisions, with some likely involving pedestrians. If you have questions regarding these comments, please contact me at your convenience.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The County appreciates Tom Brohard and Associates, for submitting comments on the Draft EIR. No changes to the Draft EIR are needed.

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O8-120	Tom Brohard, PE C.V (Page 72 to Page 73)	The curriculum vitae for Tom Brohard is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-121	**EXHIBIT D** RESOLUTION TO APPLY FOR AND ACCEPT GRANT FUNDS FROM THE STATEWIDE REGIONAL PARK GRANT PROGRAM (DISTRICTS: 1, 2, 5) (Page 74 to Page 84)	Exhibit D is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-122	**EXHIBIT E** Preserve Alpine's Heritage Alpine Community Plan Area (CPA) Recreational Facilities (Page 85 to Page 91)	Exhibit E is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-123	**EXHIBIT F** ALPINE PARKS AND LARGER PARCELS (Page 92 to Page 93)	Exhibit F is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-124	**EXHIBIT G** COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GROSSMONT UNION HIGH SCHOOL DISTRICT'S HIGH SCHOOL NO.12 (Page 94 to Page 103)	Exhibit G is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-125	**EXHIBIT H** Wright's Field MSCP Preserve Phase IV (Page 104 to Page 144)	Exhibit H is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-126	**EXHIBIT I** STATEMENT OF PROCEEDINGS COUNTY OF SAN DIEGO BOARD OF SUPERVISORS REGULAR MEETING MEETING AGENDA WEDNESDAY, JANUARY 13, 2021, 9:00 AM (Page 145 to Page 149)	Exhibit I is acknowledged. No further response is required. No changes to the Draft EIR are needed.
O8-127	**EXHIBIT J** Alpine Revitalization Steering Committee (Page 150 to Page 153)	Exhibit J is acknowledged. No further response is required. No changes to the Draft EIR are needed.

Comment Letter O9: Cleveland National Forest Foundation, May 18, 2022

Comment#	Comment Text	Response
O9-1	On behalf of the Cleveland National Forest Foundation ("CNFF") we submit these comments on the proposed Alpine Park Project ("Project") and the associated Environmental Impact Report ("EIR"). For the reasons set forth below, the County has failed to demonstrate a need for the Project.	The County appreciates the Cleveland National Forest Foundation for submitting comments on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
O9-2	The Project is oversized, incompatible with the rural character of Alpine, would substantially increase overall vehicle miles travelled ("VMT"), and would convert open space in an area with substantial sensitive biological resources to an active recreational facility.	Please refer to MR-7 (Transportation and Safety) for more information about the VMT analysis. No changes to the Draft EIR are needed.
O9-3	The project proposes construction of a sports complex immediately adjacent to Wrights Field, a 230-acre nature reserve. The Project, which would develop 25 acres of various recreational uses, would include parking spaces for up to 275 vehicles. A sports complex of this size in a rural setting would not only serve Alpine area residents, but would attract people from distant areas as well, resulting in increased VMT and corresponding increases in greenhouse gas emissions.	Please refer to MR-7 (Transportation and Safety) and MR-8 (Greenhouse Gases and Energy). GHG emissions from the project's proposed 480 daily trips were estimated using CalEEMod. As travel distance was not known, the default from CalEEMod was adopted, consistent with industry practice. CalEEMod assumed trip distances of 7.30 miles to 9.50 miles per trip (Appendix B of Appendix I of the Draft EIR, PDF page 110). In total, the project's mobile emissions would be 76 percent of the project's yearly GHG emissions. Therefore, the Draft EIR analyzed the potential mobile emissions from construction of the project. No changes to the Draft EIR are needed.
O9-4	Importantly, the Project is fundamentally inconsistent with SANDAG's Regional Plan and Sustainable Communities Strategy ("SCS"), which includes among its strategies to "focus housing and job growth in the urbanized areas where there is existing and planned transportation" and to "protect the environment and help ensure the success of smart growth land use policies by *preserving sensitive habitat, open space, cultural resources, and farmland*." The preeminent goal and performance target of SANDAG's Regional Plan, as mandated by SB 375, is to reduce per-capita CO2 emissions from cars and light-duty trucks to meet the California Air Resources Board's 2020 and 2035 reduction targets for the region. Id.	As discussed in Sections 4.3, *Air Quality*, 4.6, *Energy*, and 4.11, *Land Use and Planning*, of the Draft EIR, the project would have less-than-significant impacts on VMT and would not include any components that would result in substantial unplanned growth, and as such was determined to be consistent with the goals of SANDAG's Regional Plan and SB 375. Additionally, the project involves conservation of approximately 70 acres of open space, thereby preserving sensitive lands and species. No changes to the Draft EIR are needed.

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O9-5	In addition, the July 2020 Regional House Needs Allocation ("RHNA") Plan reduced the housing allocation for the 2021-2029 planning cycle in the County's unincorporated areas by 15,000 units compared to the allocation in the previous cycle. The units were transferred from the rural unincorporated areas to already urbanized areas that have established infrastructure, transit corridors, and jobs for the express reasons of making housing and transportation more affordable and to reduce VMT and greenhouse gas emissions. This means that compliance with SANDAG's Regional Plan and the RHNA would limit development in rural lands in and adjacent to forest lands, such as Alpine.	This comment discusses the potential impacts of SANDAG's Regional Housing Needs Assessment and 2021 Regional Plan. The comment does not raise specific issues related to the project or to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
O9-6	The Alpine Park Project was purportedly planned to accommodate population growth and demographic changes anticipated in the area. However, the most recent Regional Plan, indicates otherwise. SANDAG adopted the 2021 Regional Plan and certified the associated EIR, both of which incorporate the Series 14 Regional Growth Forecast which SANDAG adopted in October 2019. The Regional Plan shows a drastic reduction in the projected growth in the County's unincorporated areas. Specifically, whereas SANDAG's Series 13 housing forecast calculated an increase of 51,123 housing units in the unincorporated county between 2012 and 2050, SANDAG's current Series 14 housing forecast *reduces* this projected growth to an increase of just *7,419 housing units* in all unincorporated areas countywide during a similar timeframe (2021 Regional Plan, Appendix F at p. F-13). This reduction in population growth in the county's unincorporated areas consequently means the Project is not necessary to accommodate growth, because the projected growth rate for the Alpine area is now substantially reduced.	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. Please see the response to comment O2-53 for why the Draft EIR utilized SANDAG Series 13. The Parks Master Plan found the Alpine CPA to have a deficit of local parkland. See MR-12 (Parks Master Plan) for more details related to the need for park facilities. No changes to the Draft EIR are needed.
O9-7	In brief, in order to be consistent with SANDAG's 2021 Regional Plan and Series 14 forecast and RHNA, the County will have to *reduce* Alpine's housing allocation from the current General Plan, which will result in significantly less population growth in the Alpine area. Based on the foregoing, there no reasonable	Please see the response to comment O9-6 above. No changes to the Draft EIR are needed. The County appreciates the Cleveland National Forest Foundation for submitting comments on the Draft EIR. No changes to the Draft EIR are needed.

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	argument supporting the need for a park project of the proposed size.	

Comment Letter O10: Preserve Alpine's Heritage

Comment#	Comment Text	Response
O10-1	I am the President/CEO of Preserve Alpine's Heritage ("PAH"), a California Nonprofit Benefit Corporation, tax exempt under Section 501 (c) 3 of the Internal Revenue Code. This letter, and the below mentioned Exhibits, including their respective attachments and exhibits concern, the Recirculated Sections of the DEIR dated December 16, 2022, as modified on January 30, 2023 ("RS"). We request responses to the concerns and comments our letter raises. First, I would like to thank the County for extending the time to comment on the RS. There was some confusion when the original draft of the RS was distributed. Your modification on January 30, 2023, and extra time to respond, were welcomed. Exhibit 1 and its attachments, which are incorporated herein, is PAH's comment letter on the original DEIR submitted by our attorneys, Chatten-Brown, Carstens & Minter LLP, dated November 15, 2021. We do not believe the RS resolves the concerns raised in that letter in the sections covered in the RS. Exhibit 2, which is incorporated herein, is a letter dated May 18, 2022, from Shute Mihaly & Weinberger LLP, attorneys for the Cleveland National Forest Foundation ("CNFF") to the County concerning the original DEIR. We do not believe the RS resolves the concerns raised in that letter in the sections covered in the RS.	The County appreciates Preserve Alpine's Heritage for submitting comments on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The comment states that the RS-Draft EIR did not resolve concerns raised in Preserve Alpine's Heritage's or Cleveland National Forest's comment letters on the Draft EIR. These comments have been addressed in response to comment letter O8 and comment letter O9. The commenter included copies of these comment letters submitted for the Draft EIR, which the County responded to in the Final EIR, and do not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
O10-2	**DEIR and RS fail to comply with CEQA** Exhibit 1 points out CEQA's requirements that the County cannot eliminate an Alternative to the Project unless it fails to meet "*most* of the basic project objectives" or is infeasible. PAH has repeatedly raised an alternative for a nature- based passive park. We have suggested the passive park be smaller than the Project but significant size. With proper planning and design, the passive park could include picnic areas, including tables and chairs, a natural amphitheater or other	CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The commenter's preference for a passive park alternative is noted for the record. Alternative 5 – Passive Park Alternative was analyzed in the RS-Draft EIR in Chapter 6,

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	meeting place, play areas for children, and, of course, trails for hiking and riding. It could also have exhibits that provide education and background on the nature preserve on the adjacent County property and Wright's Field.	*Alternatives*. See MR-10 (Passive Park Alternative) for further details. No changes to the RS-Draft EIR are needed.
O10-3	This alternative was not considered in the original DEIR. The RS adds a Passive Park Alternative (6.1). Section 6.4.2.5 describes this Alternative as a .23-acre passive park parking lot. Evidently the rest of the 24.77-acres of the "park" would be the same as it is now and be preserved as a passive park. PAH has monitored the comments about the Project for quite some time, reviewed all the comment letters to the original DEIR and the various petitions and other correspondence concerning the Project and is unaware of anyone that suggested this alternative. There has been comments from some opposed to a park that said it would be nice though to have parking on the County's property to get the cars off South Grade Road for safety reasons, but that sounds more like the No Project Alternative which was eliminated because it "does not achieve any of the other objectives related to creating a community gathering place, enhancing the quality of life and public health of the community, or accommodation a variety of active and passive recreational uses. (6.5.1.2).	Chapter 6, *Alternatives*, of the RS-Draft EIR provides a reasonable range of alternatives to the project. Additionally, the No Project Alternative was not rejected and was included in the analysis in the RS-Draft EIR. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.
O10-4	Of course, a .23-acre parking lot would not provide these objectives. So why did the County include Alternative 5 and name it a passive park when it wasn't a park at all? It was Alternative 1 with a parking lot, with Alternative 1 already eliminated. If the park was consistent with what PAH and others commended for a passive park, those objectives would be met as well as most of the others. It seems the County added this only to eliminate a "passive park" alternative. As stated in Exhibit 1 "omission of a reasonable range of alternatives including (PAH's) Passive Park Alternative not only violated CEQA, but it also does the public and decision makers a disservice.	Please see responses to comments O10-2 and O10-3, above. Please also see MR-12 (Parks Master Plan) for more information regarding park needs. No changes to the RS-Draft EIR are needed.
O10-5	**Need** As Exhibit 2 points out, "the most recent Regional Plan shows a drastic reduction in the projected growth in the County's unincorporated areas…This reduction in population growth in the County's unincorporated areas consequently means the Project is not necessary to accommodate growth because the projected growth rate for the	The PMP found that the Alpine CPA is currently deficient in local park acreage without accounting for future population growth. The PMP states that the Alpine CPA, based on the existing population in 2014, has 1.73 acres of local park per 1,000 residents. The County's standard for local parks is 3 acres per 1,000 residents with a goal of 10 acres per 1,000 residents. Therefore, without accounting

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	Alpine area is now substantially reduced. Yet in several sections of the RS it states "according to the County Parks Masterplan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040." (see discussions of Objective 7 in Alternative Analysis) The basis of need for a park is questionable given the new San Diego Association of Governments' Regional Plan that was adopted prior to the distribution of the DEIR. The population density used to support the Project was based on the prior plan that showed a drastic increase in population in Alpine. There was no mention of this change in the DEIR or RS or the announcement of either document.	for future growth within the Alpine CPA, there is already a present need for additional local park acreage. Please also refer to MR-12 (Parks Master Plan) for additional information regarding the County's need for parkland in the Alpine CPA. No changes to the RS-Draft EIR are needed.
O10-6	**Conclusion** We believe that the DEIR and RS have not addressed the issues raised in Exhibits 1 and 2 and the issues raised in this letter. The EIR is legally inadequate and not in the best interest of the residents or Alpine. The Project is inconsistent with the applicable regional plans and policies. For these reasons PAH requests denial of the Project as proposed but stand willing to work with the County on a true passive park that meets the objectives outlined in the EIR. Thank you for entertaining our comments.	The commenter's concerns of the adequacy of the EIR were addressed individually in responses to comments O10-2 to O10-5 above. No changes to the RS-Draft EIR are needed.

Comment Letter O11: San Diego Audubon Society

Comment#	Comment Text	Response
O11-1	Thank you for the opportunity to comment on the Draft Recirculated Environmental Impact Report for The Alpine Park Project (DREIR). The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. We provide the following comments that address significant impacts from the trail design to sensitive plants and wildlife.	The County appreciates the San Diego Audubon Society for submitting comments on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

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O11-2	The trail system design for the project hasn't changed from the first circulated EIR, therefore it still causes significant impacts to special status plants with mitigation measures either absent or ineffective. The term "Trail System" is used seven times in the Biological Section with no explanation what the trail system is designed to accomplish. A few sentences on page 4.4-46 are at odds with a design that directs an increased number of park trail users, with 250 new parking spaces, into Wright's Field. The below will point out the following identifiable impacts: equestrian manure and invasive plant introduction, increased public presence into Wrights Field, special status plant impacts, QCO host plant impacts, CAGN vegetation impacts, and lack of an Invasive Plant Management Plan.	The purpose of incorporating trails into the park design may be found in the project objectives provided in the *Executive Summary* of the EIR (page ES-2), which include, "Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness, while preserving significant natural and cultural resources." Additionally, the County of San Diego General Plan includes Conservation and Open Space Goal COS-21.5: Connections to Trails and Networks, which states, "Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses." The comment regarding identifiable impacts will be responded to individually in the comment responses below. No changes to the RS-Draft EIR are needed.
O11-3	Section Operation, Page 4.4-29, describes a Manure Management Plan (MMP) would be prepared for the project to control disease vectors and pests. It then states that it is anticipated that long-term impacts would be reduced compared to baseline conditions. The issue is the MMP is not described in this EIR, nor what baseline conditions are to be used for comparison. The expectation provided is a volunteer and two park rangers will eliminate all expected significant impacts for the project description of a 25-acre active park and 70 acres of open space/preserve. This is an unreasonable conclusion. Can the MMP and baseline conditions for comparison be provided in the DREIR for vetting to control disease vectors and pests?	A Manure Management Plan would be prepared following approval of the project. The Manure Management Plan would require the County to ensure that all equestrian areas are cleaned at least once per day, including the removal of manure. No further response is required and no changes to the RS-Draft EIR are needed. See **MM-AQ-1: Prepare and Implement a Manure Management Plan**.
O11-4	Section Operation, Page 4.4.46, states, "Although anthropogenic presence is likely to increase through construction of Alpine Park, measures have been sought to reduce impacts on the sensitive natural communities in the adjacent open space/preserve." The anthropogenic presence will absolutely increase and the measures to reduce impacts are not described in this section or directed to where they could be found. It is also unclear how the permanent live-in volunteer will further reduce indirect impacts on sensitive habitats by their mere presence. Can this section of the DREIR be updated to properly describe increased anthropogenic impacts by the project and what	Increased anthropogenic impacts on sensitive plant communities and on plants and animals are acknowledged and discussed in RS-Draft EIR Section 4.4.4.3, *Project Impacts and Mitigation Measures*, under Threshold 1, *County Park and Trails/Impact Discussion* subheading. As stated in Draft EIR Sections 3.3 and 4.11, the County would reduce impacts on sensitive habitat through the closing of some existing trails and through the maintenance and monitoring of other existing trails currently situated within existing disturbed habitat or bare ground. The public would be subject to park rules within the proposed open space land and within Alpine Park. The live-on

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	detailed measures will be used to reduce indirect impacts and what authority the volunteer will use to protect sensitive natural communities in the adjacent open space/preserve?	volunteer that would live on site full-time would monitor the open space and trails in addition to helping with maintenance and management of the property in coordination with park rangers, allowing for responsive action to problems that may be detected (Section 4.4, *Biological Resources*). The County's park rangers enforce open space rules and regulations pursuant to San Diego County Code of Regulatory Ordinances Title 4, Division 1, Chapter 1 County Parks and Recreation; per San Diego County Code of Regulatory Ordinance Sections 41.111, 41.112, 41.113, all wildlife, plant, historical artifacts, and geologic features are protected and are not to be damaged or removed. Persons violating provisions of these sections are guilty of a misdemeanor as provided in Sections 11.116, 11.117, and 11.118 of the code, punishable by fines up to $2,500 a day for each day the person violates these sections. The park rangers and the live-on volunteer would contact law enforcement to cite offending individuals. No changes to the RS-Draft EIR are needed.
O11-5	The following section, Impacts on Wright's Field, describes increased trail usage would have the potential to increase impacts on special-status plants and wildlife. The reasoning that these impacts will be less than significant are due to the distance from Alpine Park, that ballplayers/skateboarders won't traverse, and a different entrance way into Wright's Field are not well founded. The poorly designed trail system directs all Alpine Park trail users, including horses, into Wright's Field increasing potential impacts to special status plants and wildlife habitat. Can the Project trail system be redesigned to direct users away from sensitive habitats and entering into Wright's Field?	Wright's Field Preserve is managed by BCLT and is currently open to the public for hiking, biking, and horseback riding year - round. The County worked closely with BCLT in developing the proposed trails for Alpine Park Open Space/Preserve and, at its direction, planned trails that would direct people away from the most sensitive resources on the Wright's Field Preserve. For example, the County will close a trail leading from its parcel into a particularly sensitive location in Wright's Field that is known to support the western spadefoot. No changes to the RS-Draft EIR are needed.
O11-6	This section further describes impacts to special status plants by the increase of invasive plant propagules from the increased use of the project trail system. It fails to include this scenario from the horse's hoofs from the equestrian staging area. This section, including Figure 4.4-2, also describes impacts to special status plants, "have the potential to be trampled from unauthorized users within the proposed Alpine Preserve, which could result in plant decline or mortality." The presence of proposed additional	Direct or indirect impacts on native plants from the project are not expected to result in any significant impacts on special-status species. Currently, unauthorized off-trail activities including trail trampling and parking is occurring on site. The project would include signage, trail closures, and regular monitoring by park staff to limit unauthorized off-trail uses and minimize impacts on special-status species. The presence of a park ranger and live-on volunteer is expected to reduce the risk

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	signage, a live-in volunteer and park rangers to monitor are not end all viable solutions. Lack of proper mitigation strategies allows the project to be in conflict with LU-6.1 Environmental Sustainability, COS-2.1 Protection, Restoration and Enhancement, Conservation Goal Policy/Recommendation 6 and Policy/Recommendation 11. Can these significant impacts to sensitive plant species be identified and mitigation measures such as trail redesign be provided for in the DREIR?	of unauthorized activities within the trail system compared to current conditions where the park is periodically monitored by a park ranger. After implementation of the project, it is anticipated that fewer long-term impacts on special-status plants would occur compared to baseline conditions. Please refer to **APM-BIO-1: Establishment of the Open Space Preserve** in Section 4.4, *Biological Resources*, of the RS-Draft EIR. An RMP will be developed prior to formalizing trails and before opening the open space to the public. Invasive plant management along the edges of the trails will be a management focus for the County during the long-term resource management associated with the open space. As a result, these activities would not present a significant impact on the regional long-term survival of special-status plants present on the site. No changes to the RS-Draft EIR are needed.
O11-7	Figure 4.4-3, Special Status Wildlife, shows the project trail system directs an increased amount of park users into Wright Field Preserve in direct contact of QCB host plants. Impacts are described on page 4.4- 31," QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals.", but are summarily dismissed. This expectation falls under County of San Diego Guidelines for Determining Significance, 4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term. The trail design should direct park users away from QCP host plants. APM-BIO-1, MM-BIO-3 and MM-BIO-9 do not address project trail impacts to QCB host plants adjacent to the project site. Can the DREIR be updated to identify impacts to QCB host plants by increased park users and provide a trail redesign to mitigate these significant impacts?	As discussed in Section 4.4, *Biological Resources*, of the RS-Draft EIR, specific impacts on QCB are not expected to result in regional long-term decline of this species or additional direct take of individuals. As discussed in the response to comment O11-5, the County and BCLT worked together to develop a trail plan that would direct people away from the most sensitive resources on the Wright's Field MSCP Preserve. **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** provides the details needed to support the conclusion that mitigation will be adequately provided to address impacts on QCB. The performance standard is specified (i.e., no net loss of QCB host plants), and compensatory onsite mitigation and monitoring standards are also included in **MM-BIO-3**. **MM-BIO-3** was revised in the RS-Draft EIR to clarify that the County intends to provide compensatory mitigation and habitat restoration, as well as monitoring regardless of the status of the ITP. No changes to the RS-Draft EIR are needed.
O11-8	Beyond trial use, impacts to special status plants are further identified on page 4.4-29, specifically "two Delicate clarkia individuals" and" fewer than 100 individual Palmer's grapplinghook individuals were noted in 2019" It is stated that,	The discussion has been modified to reflect that implementation of the project will reduce the potential for off-trail impacts on delicate clarkia relative to the existing conditions and that standard operating procedures, such as

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	"potential impacts would be less than significant because of the widespread nature of both species (San Diego Natural History Museum 2021). This conclusion does not match up with Section 4.4.4.2 Thresholds of Significance County of San Diego Guidelines for Determining Significance. It is in direct conflict with Part 3.A The project would impact one or more individuals of a species listed as federally or state endangered or threatened. Can the DREIR be updated to provide mitigation measures to significant impacts to Delicate clarkia and Palmer's grapplinghook individuals on a project level and not on a regional level?	signage, fencing and additional ranger presence, would prevent unauthorized off-trail impacts on sensitive plants. The RS-Draft EIR has been revised to correct this description. See Chapter 3 of the Final EIR, *Clarifications and Modifications to the Recirculated Draft EIR*. Palmer's grapplinghook is a County List D and California Rare Plant Rank 4.2 species (i.e., locally common), and is therefore subject to Section 3.C and not 3.A as stated in Section 4.4.4.2. The RS-Draft EIR analysis states, "Because of the low number of individuals affected, as well as the relatively large number of individuals in the entirety of the BSA, impacts would not result in a regional decline in the species and therefore would be less than significant," consistent with Section 3.C of the County Guidelines for Determining Significance. No changes to the RS-Draft EIR are needed.
O11-9	Section 4.4.4 Project Impact Analysis describes a Native Habitat Avoidance Area (NHAA). However, evidence provided in this EIR hardly describes such avoidance. This area is described as adjacent to the proposed equestrian staging area and designated as Permanent Impact in Table 4.4-2, Summary of Project Components and Associated Impacts. Threshold 5 on page 4.4-51 describes the new volunteer parking pad extends into the NHAA (Impact BIO-15). Measure APM-BIO-1 states Compensatory Mitigation, but this is not Habitat Avoidance with expected increased human/horse activities and volunteer parking pad. APM-BIO-1 is not sufficient mitigation to lessen the NHAA impacts too less than significant. Can the DREIR be updated to provide achievable protections for identified special status plants in the NHAA?	The County redesigned the project's equestrian staging area to avoid impacts on Engelmann oaks within areas identified as a Native Habitat Avoidance Area situated at the northern end of the proposed park (see Figure 4.4-6 in the RS-Draft EIR and **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures**). No Engelmann oak individuals or their associated canopies would be within the proposed grading limits of the project, and no direct temporary or direct permanent impacts on Engelmann oaks would occur with construction. Grading and site development would occur entirely outside of the canopy dripline of all Engelmann oaks (RS-Draft EIR Section 4.4.4.3, *Project Impacts and Mitigation Measures*, under Threshold 1, *County Park and Trails/Impact Discussion/Construction/Special-Status Plant Species* subheading). Impacts within the Native Habitat Avoidance Area are considered temporary indirect impacts (Section 4.4.4, *Project Impact Analysis*, of the RS-Draft EIR). No changes to the RS-Draft EIR are needed.
O11-10	The phrase "Invasive Plant Management" (IPM) is used once in the Special-Status Plant Species section, page 4.4-30 and "Invasive Plants" mentioned only twice more. This section conclusively states that long- term resource management by the	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The activities that will be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-

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	county will mitigate significant impacts to special status plants. The absence of details in the IPM leads to a deferred mitigation strategy. Furthermore, additional foot and horse traffic, and equipment will bring large amounts of invasive plant seeds into the habitat area, especially but not exclusively near trails. Those seeds will then be spread by wind, water, and wildlife into other habitat areas including Wright's Field. A significant amount of seasonal weeding will be required each year to offset that additional impact to protect the wildlife resource value. Please specify what entity will perform that removal, manage, fund it, and establish the performance criteria. Additionally, what agency will monitor it, what authority will be able to make sure that it is adequately completed each year, and what protocols will be established to protect the natural areas. Will the Project prepare a conclusive Invasive Plant Management Plan to address all project significant impacts to special status plants described in this letter?	term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space, as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat and County DPR will demonstrate its long-term commitment to species conservation within the open space. No changes to the RS-Draft EIR are needed.
O11-11	In Section 1.4.12.3, Birds, the DEIR states unconvincingly a case for Coastal California Gnatcatcher (Polioptila californica californica), (CAGN) non-presence at the project site by using phrases," far eastern extent of the known range of CAGN", "possibly just east of the known current range for this species", and "elevation and related weather extremes of the site may preclude occupation". In Appendix D, the Biological Resources Report, CAGN Protocol Surveys states that only three surveys were performed in July of 2019 for 9 hours and 45 minutes (Table 3). A limited survey and conjecture statements are not a reasonable conclusion to have stated in Section 4.4.2.4, "…determined to have low potential to occur; therefore, impacts on these species are not evaluated in this EIR." The project BSA exists in a HCP, NCCP and the San Diego County MSCP. The CDFW- CNDDB has CAGN records in the Alpine quadrant, as shown below. Moreover, Table 4.4-1 lists over 12 acres of Diegan Coastal Sage Scrub, CAGN habitat, in the BSA. Mitigation for an endangered species in protected habitat is required in the County of San Diego Guidelines for Determining Significance, 7.D. The project would not minimize and/or mitigate coastal sage	Coastal California gnatcatcher (CAGN) is a covered species under the MSCP and mitigation for impacts on its habitat is provided regardless of whether the species is present. Mitigation will be provided for impacts on Tier II habitat as described in **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (Table 4.4-5). CAGN surveys were conducted following USFWS protocol and, as noted by the commenter, CAGN was not detected during USFWS protocol surveys in 2019, nor was it detected during other biological surveys conducted for the project during 2019, 2020, and 2022, during which a list of species observed was collected for the species compendia presented in the BRR (Appendix D). Information regarding the far-eastern extent of the known range of CAGN may be found in the *San Diego County Bird Atlas* (Unitt 2004), which states that the eastern edge of the CAGN range appears constrained by winter cold rather than by vegetation type and that 90% of documented locations are below 1,000 feet; elevations within the Biological Survey Area are well above 1,000 feet, ranging from approximately 1,900 feet above mean sea level to approximately 2,100 feet above mean sea level. As

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	scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines. Will the RDEIR be updated to identify impacts to CAGN and Diegan Coastal Sage Scrub vegetation to provide protection for an endangered species in protected habitat?  CNDDB Species for Quad (99 records) Field Descriptions Element_Type | Scientific_Name | Common_Name | Element_Code | Federal_Status | State_Status | CDFW_Status | CA_Rare_Plant_Rank | Quad_Code | Quad_Name | Data_Status | Taxonomic_Sort 12 Animals - Birds | Polioptila californica californica | coastal California gnatcatcher | ABPBJ08081 | Threatened | None | SSC | - | 3211677 | ALPINE | Mapped and Unprocessed | Animals - Birds - Polioptilidae - Polioptila californica californica	stated in Appendix D, Section 1.4.13, this is supported by species occurrence data from USFWS (USFWS 2020), CNDDB (CDFW 2020), and the SanBIOS database (SANDAG 2020). The CAGN Survey Report presented to USFWS as required by USFWS CAGN Surveyor permit conditions is available for review as Appendix F of the BRR.
O11-12	In Section Mitigation Measures, MM-BIO-5, states mitigation for potentially significant impacts on sensitive nesting birds and raptors, "the County DPR shall avoid ground-disturbing activities during the bird breeding season in compliance with state and federal regulations regarding nesting birds." Then in the very next paragraph, its states if this cannot be followed, a 72-hour nesting bird survey will take place instead of avoidance during breeding season. The mitigation measure has no validity if it can simply be ignored as this section suggests. Can MM-BIO-5 be revised to state that ground-disturbing activities will not take place during breeding season and remove the alternative 72-hour nesting bird survey option?	Construction schedules for projects involve coordinating and planning with multiple agencies and multiple permits and must consider a wide variety of variables regarding the viability of conducting activities during certain times/seasons. Efforts are made to avoid breeding seasons; however, in some cases this can prove difficult, and therefore it has become standard practice for mitigation measures to contain text that requires a nesting season survey to ensure to the best degree possible that nesting birds would not be affected, hence the short window for the survey (shortly before commencement of construction activity). Please note the remaining text of **MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA**, found on page ES-17 of the RS-Draft EIR, states, "If any active nests are detected, the area shall be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound. The biologist shall determine if alterations to behavior have occurred as a result of human interaction. Buffers may be adjusted, based on observations by the biological monitor of the response of nesting birds to human activity."
O11-13	Thank you for the opportunity to comment on the Draft Recirculated Environmental Impact Report for The Alpine Park Project.	The County appreciates the San Diego Audubon Society for submitting comments on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter O12: California Native Plant Society, Sierra Club, and Environmental Center of San Diego

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O12-1	Please find attached comments on Alpine County Park project from CNPSSD, Sierra Club, and Environmental Center of San Diego. The two files are comments on the recirculated portions of the DEIR and 2021 comments on the DEIR as a whole, which you should already have. Please let me know that you received this email and can open the attachments. Thank you for taking these comments. Please keep us informed about the project at conservation@cnpssd.org, franklandis03@yahoo.com, Ron.Askeland@gmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments.	The County appreciates the San Diego Chapter of CNPS, the Sierra Club San Diego Chapter, and the Environmental Center of San Diego for submitting comments on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter included a copy of comments submitted on the Draft EIR, which the County responded to in the Final EIR and do not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
O12-2	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") recirculated sections ("RDEIR") of the Draft Environmental Impact Report ("DEIR"). The San Diego Chapter of California Native Plant Society ("CNPS"), Sierra Club San Diego Chapter, and Environmental Center of San Diego are united in this commentary on the Alpine Park DEIR. Collectively we have over 15,000 members in San Diego County. While we appreciate the additional analysis and the long-delayed inclusion of the community-requested Alternative Five, we still find the DEIR to be a sorely inadequate project description, leaving both the public and the County Board of Supervisors guessing the near-and long-term outcomes of numerous project impacts. Our detailed comments are given below, after our general critique.	The commenter states that the RS-Draft EIR project description remains inadequate. However, no specific reference is cited regarding either an aspect of the project description or impact of concern that the commenter considers to be inadequate. Accordingly, this is considered an introductory comment and responses to the specific comments are provided below. No further response is required. No changes to the RS-Draft EIR are needed.
O12-3	Critically, the RDEIR fails to include any design revisions on the preferred alternative, although two redesigns (volunteer pad and equestrian staging area) are mentioned in the text. Therefore, all the critiques of the inadequacies of the preferred design in our 2021 letter (attached) remain relevant.	Responses to the comments submitted by CNPS, the Sierra Club San Diego Chapter, and the Environmental Center of San Diego on the Draft EIR are provided in responses to comments O2-1 to O2-71. No changes to the RS-Draft EIR are needed.

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O12-4	Equally critically, there is no Resource Management Plan ("RMP"), there is no Habitat Restoration and Enhancement Plan ("HREP") there is no Invasive Species Management Plan ("ISMP"), nor is there a Manure Management Plan ("MMP"). All of these are required to make the mitigations work. Why have they not been written in the year since the DEIR first came out? Deferring essential mitigations is inappropriate, as discussed in the 2021 letter.	The project includes an RMP, Habitat Restoration and Enhancement Plan, and Manure Management Plan. Mitigation will occur through the preservation of habitat onsite with management and monitoring defined in the RMP that will be developed in coordination with CDFW prior to formalizing trails and before opening the Alpine Park Preserve to the public. Please refer to MR-4 (Natural Resource Mitigation). Section 4.4, *Biological Resources*, of the RS-Draft EIR includes **APM-BIO-1: Establishment of the Open Space Preserve**, which states the following: "As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with an RMP. The activities included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space, as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat and the County DPR will demonstrate its long-term commitment to species conservation within the open space." The Habitat Restoration and Enhancement Plan provides direction for implementation of habitat enhancement within occupied habitat for the QCB, restoration of native grasslands, and creation of western spadefoot toad basins on lands owned by the County and the adjacent Wright's Field Preserve. The County will implement QCB habitat enhancement, grassland restoration, and the western spadefoot toad basin creation on the Alpine Park and Wright's Field Preserves. The County will be responsible for the planning, contracting, implementation, maintenance, monitoring, and reporting for the three mitigation efforts until the areas has been deemed successful by the California and U.S. wildlife agencies. The Manure Management Plan is a requirement per **MM-AQ-1: Prepare and Implement a Manure Management Plan,** and will be required prior to equestrian use and implemented

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		during project operation. No changes to the RS-Draft EIR are needed.
O12-5	This Project has suffered from trying to be both a regional and community park. The preferred alternative is regional, with public input solicited from all over San Diego County, with facilities designed for regional needs. However, the Project's stated objectives have been to provide benefits only to Alpine. The objectives appear based on unsupported claims that Alpine residents lack access to parks, which they do not; that Alpine lacks park facilities, when in fact Alpine has multiple, underused facilities for these amenities; and that the community wants the preferred alternative, when 60 percent of Alpine residents polled said they wanted something like Alternative 5 (see previous letter, attached, for discussion of all these claims).	Please see MR-12 (Parks Master Plan) and response to comment O10-5 above for additional information on the current deficit of local parks in the Alpine CPA. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.
O12-6	The problem with cramming a regional park's worth of maintenance and funding needs into a community park should be obvious. Why should a community park require two dedicated rangers and an onsite volunteer? Why does it need millions of dollars in excavation and separate projects for water, sewage, and sidewalk construction? Why does it need so much mitigation for the impacts it causes? These are not just rhetorical questions. The County will inevitably face recessions and budget shortfalls in the years to come, and park staffing and maintenance is among the first things to be cut. As designed, the Project requires a generous operating budget, multiple full time employees, water regardless of regional drought issues, and substantial maintenance to serve its functions. Otherwise, it will become another pit of deferred maintenance, waiting in perpetuity for whenever resources become available. Since the Project is, from its objectives, a community-level park, why should anyone expect it to always receive the resources of a larger park, even if it needs them?	The project is funded by County General Funds. Please see MR-12 (Parks Master Plan) for more information regarding park needs. The live-on volunteer that would live on site full-time would monitor the open space and trails in addition to helping with maintenance and management of the property in coordination with park rangers, allowing for responsive action to problems that may be detected (Section 4.4, *Biological Resources*). No changes to the RS-Draft EIR are needed. Please refer to MR-4 (Natural Resource Mitigation) for additional information regarding mitigation. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to help reduce overall water demands within the PDMWD service area. Landscape design would include the installation of drought-tolerant native plants

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		to reduce water demands for irrigation. No changes to the RS-Draft EIR are needed.
O12-7	Yes, other people in the County do not have access to parks like the one proposed. But they need parks built closer to them, not in Alpine. Park investment should go where there are no recreation opportunities, not to places like Alpine that have underutilized facilities. What to do in Alpine County Park instead?	Please see MR-12 (Parks Master Plan) for more information regarding park needs. No changes to the RS-Draft EIR are needed.
O12-8	• Why not re-engineer the curb on South Grade Road where the existing ad hoc parking lot is, to make a simple driveway accessible to regular cars, and to encourage people to park in a single area? How about moving some boulders to keep the informal parking lot from growing further and to prevent people driving onto the grassland? Why not scrape the unpaved lot after rainy years to minimize erosion and encourage people to park only there? This provides stable access for Wright's Field, which is needed. It can remain dirt, which will appropriately keep people out of the park when the soil is wet.	This comment suggests alternate uses for the project site. Please refer to MR-10 (Passive Park Alternative) and response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
O12-9	• Why not leave the to-be-developed native grassland in its current state and wait 15 years? If Alpine has grown to the point that it needs more local park space, reconsider developing the site using technology that is genuinely carbon neutral. Regardless, in 15 years, revisit the decision to keep the site as it is or build a park that meets the needs of Alpine and the County at that time, because it's superfluous now. Why not consider that the site as it exists may be more useful to the County as a Tier I mitigation bank and/or a carbon sequestration area, and not destroy those sorely needed functions?	The commenter's preference for the No Project Alternative is noted for the record. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
O12-10	• Why not write a Resource Management Plan for the entire Park? Why not include an Invasive Species Management Plan? Would a Manure Management Plan or a Habitat Restoration and Enhancement Plan be necessary in a less developed park? If so, why not write them? If the space is minimally developed, most of the mitigations proposed in the DEIR and	Please see MR-4 (Natural Resource Mitigation) for information regarding the RMP. The Manure Management Plan is a requirement per **MM-AQ-1: Prepare and Implement a Manure Management Plan** to reduce potential air quality impacts caused by the equestrian use of the project. The Manure

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	the RDEIR will be unnecessary, and these plans will be comparatively easy to write.	Management Plan will be required prior to equestrian use and implemented during project operation. The Habitat Restoration and Enhancement Plan provides direction for implementation of habitat enhancement within occupied habitat for the QCB, restoration of native grasslands, and creation of western spadefoot toad basins on lands owned by the County and the adjacent Wright's Field Preserve. The County will implement QCB habitat enhancement, grassland restoration, and the western spadefoot toad basin creation on the Alpine Park and Wright's Field Preserves. Following the completion of site reclamation and revegetation installation activities, the restoration areas will enter a 5-year maintenance period. A 5-year maintenance program will be provided to ensure the successful establishment and persistence of the restored habitat. No changes to the RS-Draft EIR are needed.
O12-11	• In other words, why not follow Alternative Five? In a time of rapid change and reorganization, we do not need another heavily engineered, big lawn park to maintain. If the proposed park is built, either it will become a regional destination, in which case Alpine residents will be crowded out, or it will not be used much more than the site already is, in which case it will be a white elephant with a maintenance backlog due to the expansive soils and climate change. Or both sequentially. By the time Alpine grows enough to generate 500 trips per day as a local park, the Preferred Project will be dilapidated and need massive rebuilding to meet new, carbon-neutral land use codes. Why not skip the white elephant stage and wait to see what the actual, long-term need is?	Please see MR-10 (Passive Park Alternative) and Chapter 6, *Alternatives,* of the RS-Draft EIR for more information on Alternative 5. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.
O12-12	• If the County has millions to spend on parks, why not prioritize those funds to support environmental justice needs in less developed communities? Residents of Alpine seem to agree with this idea. Why not let them be generous?	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
O12-13	Native Plant and Vegetation Issues (RDEIR section 4.4) *Mapping of Engelmann Oak Woodland* There are three levels of issues here. First, especially within the Project boundary, the mapping of Engelmann oak vegetation	Vegetation communities were mapped pursuant to County guidelines (County of San Diego 2010) and were described according to the *Terrestrial Natural Communities of California* (Holland 1986) as modified by Oberbauer et al. (2008).

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	seems to be limited to the area around the oaks (*Quercus* engelmannii) themselves, with even a few feet between trees mapped as buckwheat scrub. This is problematic for two reasons. First, vegetation units are of minimum size, and for trees blocsof 20 meters square or more are appropriate units. Single trees are not. Also, open Engelmann oak woodlands have <50% cover by Engelmann oaks, which is not what is mapped with these polka dots. Every area where there is 30-50% oak canopy should be mapped as open Engelmann oak woodland.	Additional Engelmann oak surveys and mapping were conducted in June and September 2020, and an additional vegetation survey was conducted in June and July 2022 to update vegetation conditions within the BSA and confirm that the mapping met a 0.10-acre minimum mapping unit requirement. No changes to the RS-Draft EIR are needed.
O12-14	Second, from the *Manual of California Vegetation, Second Edition*, Engelmann oak vegetation can have an understory of grass, coastal sage scrub, chaparral, or a mix. Comparing Figure 4.4-1 with Google Earth, it appears possible that there are a number of Engelmann oaks within the "coastal sage scrub-chaparral transition." If that is the case, some parts of that may need to be mapped as open Engelmann oak woodland.	Please see the response to comment O12-13. No further response is needed. No changes to the RS-Draft EIR are needed.
O12-15	Third, Englemann oak woodland is a Tier I vegetation type, while buckwheat scrub is a Tier II vegetation type. It is therefore troubling that the oaks in the Project area are mapped as not vegetation, because everything else around them is mapped as buckwheat scrub and subject to less mitigation. Please map vegetation consistently. This may well mean that the Project has unmitigated impacts to Engelmann oak woodland.	Please see the response to comment O12-13. No further response is needed. No changes to the RS-Draft EIR are needed.
O12-16	*Impacts to Wright's Field* The conclusion that operational impacts from the Alpine Park would not have a significant impact on Wright's Field because it's 600 feet away is a poor argument. The RDEIR states (p. 4.4-29). "However, the proposed Alpine Park would be approximately 600 to 800 feet away from the eastern edge of Wright's Field. At that distance, impacts from operation of the active park and formalization of the trails would dissipate considerably and be considered less than significant..." Given that most of the trails connect to Wright's Field and even small children can walk that 600 feet (from on-site observation), this is ludicrous. It is even more ludicrous because the shortest and safest way for children to get from Joan McQueen Middle School	Wright's Field has its own formal and informal entrances that are not within the County's property, indicating that usage on Wright's Field is not wholly dependent on what occurs on the County's parcel. The County has acted in good faith in working with BCLT to design its trails specifically to reduce impacts on Wright's Field Preserve. See MR-2 (Indirect Impacts on Wright's Field) for additional information. No changes to the RS-Draft EIR are needed.

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	or Boulder Oaks Elementary is across Wright's Field. Indeed, Back Country Land Trust has discussed modifying trails in Wright's Field to deal with increased foot and bike traffic from the west, where the schools are.	
O12-17	The Project's indirect impacts to Wright's Field have to be analyzed and mitigated. At a time when the County is trying to cut Vehicle Miles Travelled and people of all ages traverse Wright's Field as a matter of course, why assume that people using the developed park will only drive there? This is not a future the County is planning for.	See MR-2 (Indirect Impacts on Wright's Field) for additional information. No changes to the RS-Draft EIR are needed.
O12-18	*Tier I Mitigation* First, MM-BIO-10 prescribes roughly 30 acres of Tier I mitigation for the roughly 15 acres of impacts to native grassland. This measures states (p. 4.4-47) "Success criteria established in that HREP will include achieving at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site." Although sources vary on the minimum percentage of native grass cover for mapping native grassland, the DEIR references the Draft Vegetation Communities of San Diego County (Oberbauer et al 2008) which states that "The percentage cover of native species at any one time may be quite low, but is considered native grassland if 20% aerial cover of native species is present." Therefore, the MM-BIO-10 success criteria should be raised from a goal of 5 percent native grass cover to 20 percent.	The commenter describes that standard references for vegetation mapping require "20% aerial cover of native species" for mapping of native grasslands." Section 1.4.10.7 of the BRR identifies that onsite valley needlegrass grassland met a "5 to 10 percent cover threshold of native species." Onsite native grasslands were mapped as valley needlegrass grassland, even though they did not meet the standard guidance of 20 percent aerial cover of native species, primarily because of the even distribution of purple needlegrass with other native forb species (primarily blue dicks [*Dipterostemon capitatus*]). Strictly following the standard references during site vegetation mapping would have resulted in substantial portions of the site being considered as less-sensitive Tier III nonnative grasslands instead of the Tier I native grasslands that they were mapped as. The success criterion in the Habitat Restoration and Enhancement Plan of "at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site" is designed to mirror and represent the conditions of the area that would be affected. Mitigation efforts will be reviewed by the California and U.S. wildlife agencies in order to determine mitigation success. No changes to the RS-Draft EIR are needed.
O12-19	Second, Tier I habitat mitigation includes restoring 7.41 acres of habitat on Wright's Field. No additional detail is provided about	Please see MR-4 (Natural Resource Mitigation) for information regarding the RMP. Activities to be included in the RMP would

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	what type of habitat will be created, where within Wright's Field it will be added, the feasibility of this, or a restoration plan with monitoring, management, and success criteria. Will the RMP address this offsite restoration and long- term management? We don't know because there is no RMP. The DEIR needs to include a detailed off-site restoration plan as well as a RMP	enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. No changes to the RS-Draft EIR are needed.
O12-20	*Trail System Issues* The trail system design for the project has not changed from the DEIR. The trails left open cause significant and unmitigated impacts to special status plants, as shown below. The term "Trail System" is used seven times in the Biological Section with no explanation what the trail system is designed to accomplish. The language on RDEIR page 4.4-46 is problematic in multiple ways: • How will trails be closed? Some of them cross annual grassland, and most have no suitable brush nearby for brushing them closed. Is signage presumed to besufficient? • The "formalized" trail system forces walkers, dog-walkers, families, parents with strollers or small children, bikers, and equestrians onto trails that in some cases are currently only two feet wide. What are the biological impacts of increased, two-way traffic and the likely widening of these trails? What are the safety impacts of forcingso many users to share these trails with two-waytraffic? • How will enforcement work? Will County employees and volunteers be given eBikes to chase down scofflaws riding on closed trails? Will they issue citations or confiscate bikes? Is there a point at which chasing down scofflaws might cause more harm than good? • What is the point of the trail system? It does little to steer people away from sensitive plants and animal habitat. It loops into Wright's Field, but crucially ignores some major established connections between the properties, thereby	An RMP will be developed prior to formalizing trails and before opening the open space to the public. Please see MR-4 (Natural Resource Mitigation) for information regarding the RMP. An RMP will include long-term management and monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space. As part of operations of the project, signs would be clearly posted containing park rules and regulations that would be enforced at the park. Please see response to comment O11-4 above regarding enforcement, and response to comment O11-2 above regarding the incorporation of trails into the project. Project impacts and mitigation measures are discussed in Section 4.4.4.3. Trails that lead to and are within sensitive areas would be closed. Signs are a standard trail design feature throughout County parks and open space. The formalized trails would continue to be multi-use and allow for pedestrian, bicycle, and equestrian uses. Multi-use trails can be found throughout much of County open space. No changes to the RS-Draft EIR are needed.

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	tempting people to continue to use informal trails visible on Google Earth in 1990s imagery. And as noted above, if followed, it forces more people onto narrower trails. What is this effort supposed to improve about the Project? How will this improvement be quantified? Will the improvements outweigh the impacts, especially from trail widening? Lack of proper mitigation strategies allows the project to be in conflict with LU-6.1	
O12-21	Environmental Sustainability, COS-2.1 Protection, Restoration and Enhancement, Conservation Goal Policy/Recommendation 6 and Policy/Recommendation 11. Can these significant impacts to sensitive plant species be identified and mitigation measures be provided for in this EIR?	Impacts on and mitigation for sensitive natural communities and special-status plants are disclosed in Section 4.4, *Biological Resources*, of the RS-Draft EIR. Section 4.4 includes **APM-BIO-1: Establishment of the Open Space Preserve**, which, along with **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**, would reduce potentially significant direct and permanent impacts on sensitive vegetation communities to below a level of significance through habitat-based mitigation. No changes to the RS-Draft EIR are needed.
O12-22	Second, Figure 4.4-3 and others show the project trail system directs an increased amount of park users into Wright Field Preserve in direct contact with sensitive plants and Quino Checkerspot Butterfly (QCB, Euphydryas editha quino) host plants. Impacts are described on page 4.4-31," QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals.", but are summarily dismissed. This expectation falls under County of San Diego Guidelines for Determining Significance, 4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term. The trail design should direct park users away from QCB host plants. APM-BIO-1, MM-BIO-3 and MM-BIO-9 need to be modified to address project trail impacts to QCB host plants adjacent to the project site.	The discussion regarding indirect impacts on Wright's Field Preserve was refined in the RS-Draft EIR, consistent with comments received on the Draft EIR. Please also refer to MR-2 (Indirect Impacts on Wright's Field) for additional information. No changes to the RS-Draft EIR are needed.
O12-23	Beyond trial use, impacts to special status plants are further identified on page 4.4-29, specifically "two Delicate clarkia [Clarkia delicata, CRPR list 1B] individuals" and" fewer than 100 individual Palmer's grapplinghook [Harpagonella palmeri, CRPR List 4] individuals were noted in 2019" It is stated that, "potential impacts would be less than significant because of the	Please see response to comment O11-8 for information on delicate clarkia and Palmer's grapplinghook plants impacts.

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	widespread nature of both species (San Diego Natural History Museum 2021). This conclusion does not match up with Section 4.4.4.2 Thresholds of Significance County of San Diego Guidelines for Determining Significance. Since delicate clarkia is a list 1B species, impacts to it need to be mitigated within the Project, and impacts to all sensitive species must be properly mitigated.	
O12-24	Thank you for taking these comments. Please keep us informed about the project at conservation@cnpssd.org, franklandis03@yahoo.com, Ron.Askeland@gmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments, or to set up a meeting.	The County appreciates the San Diego Chapter of CNPS, Sierra Club San Diego Chapter, and Environmental Center of San Diego for submitting comments on the RS-Draft EIR. This comment and the included contact information will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment Letter O13: San Diego Mountain Biking Association

Comment#	Comment Text	Response
O13-1	I am pleased to write this letter on behalf of the San Diego Mountain Biking Association (SDMBA) to submit our comments on the updated Draft EIR for the plan for the Alpine County Park. SDMBA supports the original proposed park plan and rejects any of the offered alternatives in the DRAFT EIR. The community of Alpine deserves a park that has been planned with extensive input from the community over the past 4 years. We continue to stand in full support of the bike park and all-wheel park amenities which we know will be embraced by the community and riders of all ages.	The County appreciates the San Diego Mountain Biking Association for submitting comments on the RS-Draft EIR. The commenter's support for the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
O13-2	The San Diego Mountain Biking Association (SDMBA), founded in 1994, is the leading trail advocacy organization in the County. Our mission is to improve trail access for mountain biking in San Diego County. Our goals include creating and enhancing connected trail systems in both urban and rural settings that allow for recreational opportunities and alternative transportation options balanced with the conservation needs of our unique environment.	This comment provides background information on the San Diego Mountain Biking Association and states the organization's support for the project. No further response is needed. No changes to the RS-Draft EIR are needed.

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

Comment Letter O14: San Diego Mountain Biking Association (Voicemail)

Comment#	Comment Text	Response
O14-1	Hey Anna, this is Susie Murphy with the San Diego Mountain Biking Association. I was just going through the draft EIR for the Alpine Park and yeah wow, just wanted to chat about the alternatives. I skimmed it at this point and it seems that Alternative 3 retains the plans for the bike park and the all-wheel park. So anyway I just wanted to get your insights and we are definitely planning on submitting comments before the February deadline, but just wanted to see other insights and thoughts if we were on the right track on that Alternative 3. Anyway, no rush on this if you are already off for the holiday. Please feel free to get in touch with me in early January or whenever. Okay, bye.	This comment is acknowledged. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of Alternative 3 – Reconfigured Project Alternative and its relationship to the project objectives. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I1: Dawn August, November 12, 2021

Comment#	Comment Text	Response
I1-1	My husband and I have resided in Alpine since 1975. We came here because of the small town rural community. We are both real estate Brokers and have been operating our own real estate office since 1979 in downtown Alpine. We raised all three of our children in this community. Alpine has grown, but it has been planned growth over the years. As residents for 46 years now, we love our community. We would like to see that it is preserved for future generations.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.

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I1-2	The location that the County has selected for this proposed park is the wrong location. It is located in a rural residential area with windy roads, without bike lanes, pedestrian walkways and in a lot of places no shoulder or very little shoulder. There have been multiple fatalities in the same location of where both entrances will be located on S Grade Rd. The County is projecting at least 500 people per day, that is a total of 3500 per week and 14,000-15,000 per month. Bottomline is, that the infrastructure will not support this large Regional Park. I am aware of other efforts to improve our roadways that are currently underway or are in the planning stage which impacts were not analyzed in the DEIR. Can you explain why this was omitted? Can you please explain how this location will be safe for Alpine's families and children? The added traffic of a projected 500 people will make it unsafe on our own windy rural roads.	The selected location for the project is the result of investigations of alternative sites conducted by County DPR, based on considerations of site availability and suitability as that relates to the project objectives. See MR-12 (Parks Master Plan) for further discussion related to the park needs location. Please see Chapter 6, *Alternatives*, of the RS-Draft EIR for additional information. Regarding transportation effects, please see MR-7 (Transportation and Safety) and Draft EIR Section 4.17, *Transportation and Circulation*, which concludes that adequate roadway capacity exists, to which the addition of vehicular traffic to/from the project site would be minimal. Other efforts to improve roadway conditions are not part of the project and were not analyzed in the Draft EIR. No changes to the Draft EIR are needed.
I1-3	Per your DEIR report, it is projected that 16,471272.8 gallons of water is to be used for the park per year. That is an absorbent amount of water. We are currently in a Severe Drought and Governor Newsom has asked for a reduction in our water usage by 15% per household. How is the County proposing to conserve water? The estimate for cost of water just for the 8 acres of landscaping alone is approximately $200,000 per year and that is for (per DEIR report) 13,846,272.8 gallons per year. It is totally irresponsible for a public agency to propose such water uses during a severe drought with no end in sight. The bigger question is, who is going to pay for this excessive water usage?	Please see MR-15 (Water and Wastewater). For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.
I1-4	There is very little mentioned in the 567 page DEIR report regarding Green House Emissions. The project construction activities alone would result in generating of GHG emissions that would conflict with the 2017 Scoping Plan. Impacts would be potentially significant during construction. The impacts after completion would need to be evaluated since transportation creates 29% of GHG (based on studies). Increased traffic will result in increased GHG emissions which undoubtedly cannot be mitigated for, unless the park is reduced to a passive park	Please refer to MR-8 (Greenhouse Gases and Energy). Draft EIR pages 4.8-13 through 4.8-19 discuss the project's operational emissions. Section 4.8, *Greenhouse Gas Emissions and Climate Change*, also describes how implementation of **MM-GHG-1** will reduce these impacts to a level considered less than significant. The project's operational uses would be consistent with the 2017 Scoping Plan, as the project does not have control over vehicle fuels or fleet mix. No changes to the Draft EIR are needed.

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	intended for the local community. This needs to be addressed. How is the County going to address this?	
I1-5	There are so many concerns and issues with the proposed location of this mega park. The lighting is of concern, the excessive noise, traffic and pollution. This is a very high fire risk area and was more recently impacted in the West Fire in 2018. With higher usage, visitors and San Diegans coming up here, there is even a higher risk of fires, because these folks do not live in a high fire risk area like we do. They do not understand the higher fire safety that Alpineans have to practice. Also, the increased vehicle traffic increase the possibility for fire ignition, not to mention the BBQ pits, cigarettes and the potential catastrophic loss of life if visitors plus residents are unable to evacuate.	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed. Regarding transportation effects, please see Draft EIR Section 4.17, *Transportation and Circulation*, which concludes that adequate roadway capacity exists, to which the addition of vehicular traffic to/from the project site would be minimal. Regarding air pollution, please see Draft EIR Section 4.3, *Air Quality*, which concludes that emissions from vehicles accessing the park would not exceed impact significance criteria. A detailed discussion regarding potential wildfire risk is provided in MR-9 (Wildfire) and RS-Draft EIR Section 4.20, *Wildfire*. In that discussion, adequate onsite rules and offsite protection pursuant to established response procedures are noted. Insofar as non-local persons using the park facilities are concerned, signage would be provided indicating the rules needing to be followed to avoid fire incidents. For additional information, please refer to Section 4.20, *Wildfire*, of the RS-Draft EIR for discussions of wildfire conditions and regulations. No changes to the Draft EIR are needed.
I1-6	The County has been deceptive to the Alpine Community stating that this park would be for our local community. When in fact, what is being proposed is another Regional park to attract visitors and others from San Diego. Currently the existing Wrights Field, that is 202 acres is currently labeled by the County (in the DEIR report) as a Neighborhood Park. So the question becomes why do we have to have a Regional Park abutting up to our already existing local Park? Alpine is over parked for Regional Parks, please see https://1drv.ms/b/s!AjOSesLmgg8SiRV1y4kcbywrEQNG We already have local parks in Alpine. One 2 acre park at Boulders Oaks Neighborhood Park. We have two more at our middle school and Shadow Hills Elementary School that total 24 acres (per the County DEIR). We also have the Alpine Community	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the Draft EIR are needed.

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	Park. It is also noted per the DEIR report that the Cleveland National Forest is within our Project area and has 28,020 acres that is labeled a Regional Park. So why do we need another Regional Park with a price tag of 28 million? This property is designated as Pre-Approved Mitigation per the MSCP. Not to mention the previous attempts to develop the land failed partly due to the high biological value of the resources.	
I1-7	Since a large part of the actual park will fall into the Farmland of Local Importance according to the FMMP map, why would we want as a community, a concrete park with at least 275 asphalt parking spaces with planted grass and trees, when it is already a natural preserve that should only warrant a nature preserve park?	The project would include up to 240 parking spaces. Please refer to Section 4.2, *Agriculture and Forestry Resources*, of the Draft EIR. As stated in the Draft EIR, although the project would convert approximately 54.92 acres of Farmland of Local Importance to park and open space uses, the site is not currently being used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria, as defined by the Farmland Mapping and Monitoring Program. Please also note that approximately 70 acres would be retained for open space purposes. No changes to the Draft EIR are needed.

Comment Letter I2: Brad Bach, November 15, 2021

Comment#	Comment Text	Response
I2-1	I would like to take this opportunity to state some concerns that I have regarding the proposed park development project in Alpine.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I2-2	Having read residents' valid and well stated concerns, and opposition in some cases, I will simply state for myself that I do not think that the present plan fits in well with what most people have chosen to live in Alpine for. Most want rural, natural, quiet living. People that don't feel we need a Starbucks on every other corner and don't need a skate park in Alpine. We would like to leave this large property, Wright's Field in a very natural state,	The commenter's preference for retaining a passive park use for the project site is noted for the record. Please also refer to MR-10 (Passive Park Alternative) for more information regarding a passive park alternative.

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	largely as it presently is. This doesn't mean that developing a parking area and some limited amenities isn't a good plan,	
I2-3	but certainly transforming it into a large all wheel recreation type of park with loads of concrete and promoting activities that will generate a large traffic impact,	Regarding the all-wheel park, please refer to Section 3.3.1, *Active Park*, of the Draft EIR for a detailed outline of the components of the approximately 25-acre active park area. Only approximately 20,000 square feet of the active park (roughly 1.8%) would be dedicated to an all-wheel recreation area composed of concrete. Regarding the traffic impact, please refer to MR-7 (Transportation and Safety) and Section 4.17, *Transportation and Circulation*, of the Draft EIR, which discusses the potential impacts of the project on traffic and why the project would not result in any significant impacts. Furthermore, please refer to Appendix I, *Alpine Community Park Transportation Impact Study*, of the Draft EIR for a more detailed analysis. No changes to the Draft EIR are needed.
I2-4	lighting impact, and noise pollution, is not a good choice.	See M MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed.
I2-5	And I know that the noise question has been explained by the County, but I don't buy it. Even with berms and mitigation the noise impact will be significant. This is an extremely low ambient noise area so sound really is noticed at a distance. Not to mention all of the noise generated by the additional automobile traffic.	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I2-6	Also, along with others, I too challenge the planned grass areas with the tremendous amount of water use involved as well as mowing maintenance. In our region of the country that is simply bad planning. Or just not planning.	The commenter's concern with the water usage of the park is acknowledged. Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.

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I2-7	The bottom line is that I would support a modified, much more limited park plan. Just not this one. I don't think that it is right for Alpine.	Please refer to MR-10 (Passive Park Alternative) regarding the Passive Park Alternative.
I2-8	Please respect the wishes of the residents. Not everybody wants to develop every area into an urban type of setting. The residents that have chosen Alpine to call home have done so for a reason and the County park plan doesn't fit into that reason.	This comment expressing opposition to the project is noted for the record. No further response is required. No changes to the Draft EIR are needed. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project.

Comment Letter I3: Elaine Benjamin, November 13, 2021

Comment#	Comment Text	Response
I3-1	I appreciate the opportunity to comment on the Alpine Park Project Draft Environmental Impact Report. I have been a resident of Alpine for over 30 years. I am a proponent of the smaller version of the park. I attended a meeting in 2019 to voice my vision of a park. The consensus of the people attending the meeting was for a 12 acre park with emphasis on hiking, biking, and horseback riding trails, a leash free dog park, a rustic natural style playground, and picnic tables. I was very disappointed to see a much bigger, more developed park be proposed.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please refer to MR-10 (Passive Park Alternative) regarding the Passive Park Alternative. No further response is required. No changes to the Draft EIR are needed.
I3-2	I do not feel the DEIR adequately clarifies how water will be brought in to the park, or what waste removal system will be developed. Will wells be drilled or county water be used? Will the park be serviced by aseptic system, or will sewer lines be installed? These are important questions and they must be answered before moving forward, as the impact will be felt by the surrounding community.	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR and MR-15 (Water and Wastewater) for a description of the water supply and wastewater conveyance and treatment. The project would be connected to existing water conveyances within South Grade Road. To accommodate the additional water demand, new or expanded water conveyance infrastructure would be installed, thereby providing sufficient capacity. Regarding sewage conveyance, an onsite connection to an existing sewer line is one of two options available for sewage disposal from the project site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road, near the intersection with Alpine

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		Boulevard. An onsite sewer treatment system is a second option for disposal of sewage associated with the project. That system would be in the northern portion of the project site, north of the equestrian staging area. Two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site, with a capacity of 1,500 gallons, and the other a main tank near the restroom in the northern portion of the project site, with a capacity of 15,000 gallons. The selection of which of these two options is most appropriate for the project will be made as the project proceeds into further detailed development. No changes to the Draft EIR are needed.
I3-3	It is not clear in the DEIR how South Grade Road would not be aversely affected by this project. A road that is already very busy. I am concerned that many children from the surrounding area will be traveling on foot, bike, and skate board on South Grade Road to get to the park, which would put them at a high risk of becoming involved in an accident. We have already had a fatality in that area.	This comment is unsubstantiated by fact. As shown in the traffic operations analysis, South Grade Road is anticipated to carry fewer than 4,200 vehicles under the near-term conditions and 4,400 vehicles under the near-term with project conditions. South Grade Road has a capacity to carry up to 16,200 vehicles based on the County's Public Road Standards. Please see MR-7 (Transportation and Safety) regarding access and future improvements. No changes to the Draft EIR are needed.
I3-4	Alpine already has several athletic fields available. An All Wheel skate park is not compatible with the natural surroundings, and would require supervision and increase traffic on South Grade.	Please refer to Section 4.16, *Recreation*, of the Draft EIR for additional information on the existing recreational facilities and the County of San Diego Parks Master Plan. Because the population is expected to increase, the Parks Master Plan recommended the development of additional running, fishing, road biking, mountain biking, camping, and hiking facilities and the intensification of recreational services in the central Alpine area where population is expected to increase most. Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR for an analysis of the potential aesthetic impacts of the project. The Draft EIR acknowledges that the project would substantially degrade the existing visual character and quality of public views of the site and its surroundings; however, implementation of **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries** would reduce this impact to a less-than-significant level.

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		Regarding traffic impacts, please refer to Section 4.17, *Transportation and Circulation*, of the Draft EIR, which discusses the potential impacts of the project on traffic and why the project would not result in any significant impacts. Furthermore, please refer to Appendix I, *Alpine Community Park Transportation Impact Study*, of the Draft EIR for a more detailed analysis. No changes to the Draft EIR are needed.
I3-5	Outdoor lighting needs to be addressed as it would impact surrounding homes, wildlife, and increase light pollution.	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. Furthermore, please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for information regarding potential impacts and how implementation of the following mitigation measures would reduce those impacts to less-than-significant levels: **MM-BIO-1: Obtain Federally Listed Species Permitting**, **MM-BIO-2 Replace Decumbent Goldenbush**, **MM-BIO-3: Implement Engelmann Oak Avoidance and Minimization Measures**, **MM-BIO-4: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA**, **MM-BIO-5: Protect Pallid Bat**, **APM-BIO-1: Establishment of the Open Space Preserve**, and **MM-BIO-6: Provide Compensatory Habitat-Based Mitigation**.
I3-6	A nature-based park that serves the community of Alpine would be an asset to all who live here. A smaller park would not require on site supervision, maintenance of infrastructure, and would be compatible with Wright's Field, and not negatively impact the unique flora and fauna that grows and thrives there.	Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details.
I3-7	Thank you for taking my concerns and question into consideration.	This comment is acknowledged. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I4: Kymberly Bennett, November 2, 2021

Comment#	Comment Text	Response
I4-1	I have looked over the EIR and as a county resident of Alpine, I do not want anything done to Wright's Field at all. No "improvements" by the county should be made.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San

Comment#	Comment Text	Response
	We are proud of our open space preserve and want to keep it the way it is for future generations to enjoy.	Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for the No Project Alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I4-2	Putting in any kind of park will attract the wrong kind of element to our small town from other lying areas. They will graffitti it and ruin it in a matter of months. We do not have the policing resources to continually monitor the so-called "park" for vandalisim or under age drinking that will occur.	Please refer to Section 4.15, *Public Services*, of the Draft EIR for information regarding police protection services. The Draft EIR acknowledges that an increase in regional residents and visitors could result in an increased demand for police protection services. Police and emergency services planning would continue to be coordinated with the County Office of Emergency Services to establish safety protocols. Furthermore, the San Diego Sheriff's Department has a goal of providing one patrol position per 10,000 permanent residents, and the increase in regional residents and visitors to the new amenities at the project site would not be expected to be substantial enough to affect that ratio. No changes to the Draft EIR are needed.
I4-3	As an Alpine resident since 2003, I have seen too much money wasted on county endeavors. One, the "high school" that never was. I pay over $230 a year on my property taxes for a non-existent high school. NO TO THE WHOLE PARK PROJECT IN ALPINE!!!	The commenter's preference for the No Project Alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I5: Patricia Borchmann, November 15, 2021

Comment#	Comment Text	Response
I5-1	It is important that County of San Diego fully consider strong public opposition to the proposed park plan near Alpine. I join many other stakeholder to inform County planners and suspervisors of logical, scientific reasons many are opposed to the overzealous park proposal in Alpine, which will destroy 24 acres of healthy, intact open space with sensitive habitat, and instead replace it with unsustainable non-native lawns and artificial concrete paths. This rural Alpine are is not the next suburban community for developers to waste, as another cookie-	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for the No Project Alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	cutter monotonous space, that provides litttle, or no tangible community benefit. The public stakeholders in San Diego county expect, and deserve a better plan, that will integrate sustainable planning, native landscape materials, preserve natural habitat, and contribute to climate solutions.	

Comment Letter I6: Garth Brown, October 15, 2021

Comment#	Comment Text	Response
I6-1	I welcome the new park for the Alpine community, but please, please, please do not install STOP signs on South Grade Road at the park entrances	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's support for the project is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I7: Keli Cadenhead, November 15, 2021

Comment#	Comment Text	Response
I7-1	Please SAVE Wrights Field!!! We DO NOT want a sports park in the middle of this native grassland. As the Jewel of Alpine, it is used by so many, to BE in nature, to walk their dogs, to ride bikes, and still not have to go so far to do it. The wild life is precious, we can find some quiet outdoor time to spend IN nature. Will the Engelmann Oak woodland still be there after your planned park??? This is our generation's last best chance to save the small-town feel and rural heritage of Alpine for future generations. Save Wright's Field for our children and our grandchildren.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for retention of Wright's Field is noted for the record. For purposes of clarity, it should be noted that Wright's Field and its stewardship would not be altered within the footprint of Alpine Park and open space would be part of the proposed Alpine Park project. No changes to the Draft EIR are needed. Please also refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for a discussion about the impacts of the project on biological resources. Please also see **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures**.

Comment Letter I8: Alejandra Carroll, November 15, 2021

Comment#	Comment Text	Response
I8-1	The park by design is beautiful however there are serious safety concerns for vehicles and pedestrians alike and increased noise pollution for neighbors. #1: There is no sidewalk or pedestrian path incorporated into the design. How will the local children/adults safely access the park without driving a vehicle to the location? #2: The roads are narrow, very curvy and increased vehicle traffic will endanger pedestrians who will attempt to ride bicycles or walk to the park.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I8-2	#3: the noise pollution will increase with the skateboard park. Noise pollution from the skate park specifically will carry over into the existing residences/neighborhoods. Any park design elements should mimic the quiet rural area/neighborhood.	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I8-3	The park size is great I just wish the design was more aligned/designed with the current quiet, rural, nature area	The commenter's support for the project is noted for the record. While the current design is believed to be consistent with the existing natural setting, there will be further opportunity for soliciting input from residents as development of the design proceeds. No changes to the Draft EIR are needed.

Comment Letter I9: Hector Casas, November 14, 2021

Comment#	Comment Text	Response
I9-1	My name is Hector and would like to comment about the Environmental Impact Report as it relates to areas from the report that appear to have incomplete response to the specific subject being covered. We are Alpine residents located adjacent to the proposed Park Development and respectfully request that the Planning Group, Supervisors, and any party that is involved in the project addresses our concerns that are laid out in the Environmental Impact Report. Note in RED underlined questions relative to each section of the EIR.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I9-2	We have many concerns ranging from size and scope of Park to specifics about the park development that will impact our quality of life based on the extent of intrusion that the development realizes. Concern with EIR under Section 4.17 Transportation and Circulation. "Implementation of the project would not result in any potentially significant impacts related to transportation & circulation." There is no insight on Environmental impact to traffic congestion since the new proposed option will attract people from all over the county. The fact that 250 plus parking spots are under consideration to allow parking clearly demonstrates that the local Alpine Community will not be the sole beneficiary of the project. With increased traffic, there will be a requirement from San Diego County Planning Commission to provide for solution in anticipation of the increased traffic congestion. See as Reference article published in the San Diego Union Tribune written by Deborah Sullivan on September 20, 2021.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Parking spaces will not exceed 240 spaces. The number of parking spots provided is based on current park design guidelines and parking requirements; however, from a day-to-day operations standpoint, it is unlikely that the parking lot would be fully occupied. The County provides many parks throughout the County for residents. As such, it is unlikely that this park would attract visitors from all over the region. There are other parks with similar amenities that are much closer to the urbanized areas as well as freeways. No changes to the Draft EIR are needed.
I9-3	Our home is adjacent to the proposed park on the northern boundary below. Of all the Alpine Community, we will be impacted by the Park Project the most and would respectfully request that our observations are heard. Please address our questions that are inserted into each Section of the Environmental Impact Report.	The commenter's concern is noted for the record. Each of the detailed comments is addressed below. No changes to the Draft EIR are needed.
I9-4	4.1 Aesthetics and Visual Resources AES 2. Degradation of views from our property: Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points During Operation. Operation of the project would transform rural, undeveloped land to a complex regional park with several different development features, substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve.	Please refer to Figure 4.1-6 in the Draft EIR, which shows a "before" photo from a point at the northern end of the project site, looking southerly. That figure should approximately represent the view from the commenter's location. As shown in the "after" photo simulation, the general view would be virtually unchanged. The profile and grade would remain as it is at present and the only noticeable change would be the addition of vegetation, consisting of trees of similar species to those currently in place, which would be consistent with the rural nature of the setting. Similar views, from other locations on the eastern boundary of the project, can be found on Figure 4.1-6. No changes to the Draft EIR are needed.

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I9-5	PS MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries. All boundaries of the Alpine Park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the County Park. Drought tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, and on the western boundary along Wright's Field Preserve, and on the northern boundary. What "NATIVE VEGETATION" will be utilized to replace the current natural habitat and proposed vegetation to be replanted? Parks northern boundary faces our home property.	Refer to Figure 4.1-6 with a visual simulation of View Point No. 4, which looks south from the northern boundary of the project. Native vegetation would be consistent with the current vegetation communities mapped in the BRR. No changes to the Draft EIR are needed.
I9-6	How are we guaranteed that the new vegetation will aesthetically and visually be same or better than the current natural vegetation?	As discussed in the response to comment I9-5, native vegetation would be consistent with the current vegetation communities mapped in the BRR. No changes to the Draft EIR are needed.
I9-7	What measures will be taken to ensure that the new vegetation will survive without impacting water resources that currently impact the entire state?	Please see the response to comment O8-76. For additional information on water supply assessment, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I9-8	AES 3. Installation of Lighting at night – Impact-AES-3: New Source of Light Adversely Affecting Nighttime Views. Operation of the project would result in new sources of lighting at the active park that could illuminate the nighttime sky and adversely affect nighttime views. Since our home is directly facing the park boundary, this will directly impact our nighttime visual views. Can you provide us with alternative to having nighttime lighting as originally proposed to the community back in 2019? Mitigation-AES-3: Turn Off Outdoor Lighting 1 Hour After Closing. County DPR shall turn off all outdoor lighting at the parking lots, driveways, & recreational facilities in the active park 1 hour after the park closes or use motion-sensors to limit duration of lighting, except for certain lighting for safety. Outdoor lighting shall be turned on, when necessary, when the park is open. What will be the source of energy for the lighting? If renewable energy will be used, can you expand on how it will	Please refer to Section 4.6, *Energy*, of the Draft EIR, indicating the electricity during operation of project components such as the Administration building, restroom facilities, multi-purpose room, volunteer pad, and security lighting would not consume natural gas. During operation, solar panels installed on site would produce energy for the project site. Annual electricity consumption from the project's components was estimated using CalEEMod. See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.

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	be implemented without creating an aesthetic and visual eyesore?	
I9-9	4.2 Agriculture and Forestry Resources: Implementation of the project would not result in any potentially significant impacts related to agriculture and forestry resources.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.
I9-10	4.3 Air Quality Impact AQ-1: Objectionable Odors. The project may have potentially significant odor impacts related to manure located in the equestrian staging areas and corrals. Mitigation-AQ-1: Prepare and Implement a Manure Management Plan. The County DPR shall comply with the following best management practices, which will be documented in a Manure Management Plan: • The equestrian areas, including the staging area and horse corrals, shall be cleaned at least once per day Including the removal of manure. Manure stockpiled in receptacles shall be covered with a lid or tarp. Receptacles shall be located at the farthest feasible distance from nearby residents and/or sensitive receptors. What guarantee is there that the accumulation of manure and urine from equine will not create objectionable odor? What guarantee is there that manure will not cultivate potential hazard from insects carrying disease such as West Nile Virus?	As discussed in Section 4.3, *Air Quality*, of the Draft EIR, implementation of **MM-AQ-1: Prepare and Implement a Manure Management Plan** would reduce manure odors to less-than-significant levels. Additionally, as discussed in Section 4.4, *Biological Resources*, of the Draft EIR, a Manure Management Plan would be prepared to control disease vectors and pests, such as mosquitoes and other animals/insects that are vectors for disease or impacts on human health. No changes to the Draft EIR are needed.
I9-11	4.4 Biological Resources: BIO-1 - Significant impact on biological resources such as Quino checkerspot butterfly, decumbent goldenbrush, Engelmann Oaks, Cooper's hawk and red shouldered hawk, Pallid bat, sensitive communities (valley needlegrass grassland, flat-topped buckwheat stands, and nonnative grasslands), What evidence is being provided other than data in EIR that current habitat will survive? Does EIR provide details on how the proposed park with the inherent and significant increase of use of area not impact the Park Habitat as well as the adjacent Wrights Field Preserve?	Areas within the Alpine Park Preserve are anticipated to persist in perpetuity through management activities and permanent protection mechanisms inherent in the MSCP preserve assembly. Additional details on indirect impacts on the adjacent Wright's Field Preserve are provided in the RS-Draft EIR, BRR and in MR-2 (Indirect Impacts on Wright's Field), above.
I9-12	Impact-BIO-1: Significant Impacts on QCB Occupied Habitat. Occupied Quino checkerspot butterfly (QCB) habitat would be affected by construction and maintenance of the project. Impacts on occupied QCB habitat would be significant.	**MM-BIO-1** provides the details needed to support the conclusion that mitigation will be adequately provided to address impacts on QCB. The performance standard is specified (i.e., no net loss of QCB host plants), and compensatory onsite mitigation and monitoring standards are also included in **MM-**

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		BIO-1. **MM-BIO-1** has been revised slightly to make it clear that the County intends to provide compensatory mitigation and habitat restoration, as well as monitoring regardless of the status of the ITP. Refer to the response to comment O8-28.
I9-13	PS MM-BIO-1: Obtain Federally Listed Species Permitting. The County DPR shall seek a Section 10 Incidental Take Permit (ITP) (or Section 7 ITP if there is a federal nexus) for impacts on QCB-occupied habitat and seek a determination that no adverse impacts on the Hermes copper butterfly would occur because of impacts on proposed designated critical habitat for Hermes copper butterfly. Mitigation for impacts on occupied QCB habitat shall be provided in the form on onsite preservation of occupied habitat for QCB within the open space preserve, as well as the assurance that no net loss of QCB host plants will occur because of the project. The County DPR shall ensure that there is no net loss of QCB host plants by performing onsite enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot[1]seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and will include measures to restore and enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space/preserve. If impact is significant, then the natural habitat is disregarded and does the end result (Park Development) justify "significant impact on habitat" as stipulated in report?	Significant impacts on QCB would be reduced to less-than-significant levels with implementation of mitigation stipulated in the RS-Draft EIR and associated ITP (**MM-BIO-3**). See the RS-Draft EIR and revised BRR for additional impact analysis and mitigation proposed for QCB.
I9-14	4.5 Cultural Resources Impact-CUL-1: Potential to Unearth and Damage Significant Archaeological Resources During Construction. Excavation of the project has the potential to unearth and damage significant archaeological resources during construction of the project. Therefore, implementation of the project may cause a substantial adverse change in the significance of an archaeological resource as defined in State CEQA Guidelines Section 15064.5.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.

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	MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan. Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, the County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to the County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and the County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring. County DPR's CRMDP review shall ensure that appropriate procedures to monitor construction and treat unanticipated discoveries are in place. County DPR's review and approval of the CRMDP shall occur.	
I9-15	4.6 Energy: Implementation of the project would not result in any potentially significant impacts related to energy. Agree that no Energy impact if the Park Alternative does not require night illumination or activity that requires energy sourcing. In the case of the proposed Sports Complex Alternative, night illumination is being mentioned whenever a competitive event takes place within the park. Where would the energy come from under this alternative?	As shown in Table 4.6-4 in Section 4.6.4.3 of the Draft EIR, annual project operation is estimated to require 0.29 gigawatt-hour of energy, which would be supplied by the electricity provider, San Diego Gas & Electric. Operational energy consumption of the project would represent an approximately 0.002% increase in electricity consumption over the current countywide usage, which would be a minimal increase compared to San Diego County's annual consumption. No changes to the Draft EIR are needed.
I9-16	4.7 Geology and Soils Impact-GEO-1: Potential Impact on Paleontological Resources. Ground-disturbing activities that would extend deep enough to encounter previously undisturbed deposits of the Lusardi Formation in the southern and western portions of the project site would have the potential to impact	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. A Qualified Paleontologist has not been chosen but will be retained before ground-disturbing activities begin. No changes to the Draft EIR are needed.

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	paleontological resources. Mitigation-GEO-1: Implement a Paleontological Resource Mitigation Program. Ground-disturbing construction activities in the southern and western portion of the project site shall be subject to paleontological and geologic resource sensitivity screening prior to commencement of construction. The resource sensitivity screening shall determine which ground-disturbing activities would be deep enough to encounter previously undisturbed deposits of the Lusardi Formation. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological /Archaeological monitor during ground disturbing activities. The paleontological monitoring shall include the following measures: • A Qualified Paleontologist shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues. • A Qualified Paleontologist or Paleontological Monitor or cross-trained Paleontological / Archaeological Monitor shall be on site, on a full-time basis, during ground-disturbing activities that occur 10 feet or more below ground surface, to inspect exposures for contained fossils. The Paleontological Monitor shall work under the direction of the project's Qualified Paleontologist. A "Paleontological Monitor" shall be defined as an individual selected by the Qualified Paleontologist who has experience in monitoring excavation and the collection and salvage of fossil materials. • If fossils are discovered on the project site, the Qualified Paleontologist shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains. • The Qualified Paleontologist shall be responsible for the cleaning, repairing, sorting, and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation.	

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	• The Qualified Paleontologist shall deposit and donate prepared fossils, along with copies of all pertinent field notes, photos, and maps, in a scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum, approved by County DPR. • Within 30 days after the completion of excavation and pile-driving activities, a final data recovery report shall be completed by the Qualified Paleontologist and submitted to County DPR for review and approval. The final report shall document the results of the mitigation and shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. Who has been designated as the Paleontologist and / or community advocate that will have full access and communicate to us if important findings take place?	
I9-17	4.8 Greenhouse Gas Emissions and Climate Change: Impact-GHG-1: Generation of GHG Emissions that May Have a Significant Impact on the Environment. The project's construction activities would result in the generation of GHG emissions that could directly or indirectly have a significant impact on the environment because the project would not comply with the 2017 Scoping Plan. Impacts would be potentially significant for construction. GHG emissions from operation of the project would have a less-than-significant impact on the environment. Mitigation-GHG-1: Implement Construction Best Management Practices. The County shall ensure implementation of the following measures during project construction: • Require equipment to be maintained in good tune and to reduce excessive idling time. • Utilize alternative fueled equipment & vehicles, such as renewable diesel, renewable natural gas, compressed natural gas, or electric. • Require older equipment be retrofitted with advanced engine controls, such as diesel particulate	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.

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I9-18	4.9 Hazards and Hazardous Materials Impact HAZ-1: Potential Release of Contaminated Soil. Construction of the project would potentially result in the release of contaminated soil into the environment. Impacts would be potentially significant. Mitigation -HAZ-1: Prepare and Implement a Soil Management Plan. Prior to the commencement of soil disturbing construction activities, the County will retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with experience in contaminated site redevelopment and restoration to prepare and submit a soil and groundwater management plan to the County for review and approval. After the County's review and approval, the County will implement the soil and groundwater management plan, to include the following: • A Site Contamination Characterization Report (Characterization Report) delineating the vertical and groundwater sampling to characterize the existing vertical and lateral extent and concentration of residual contamination. • A Soil Testing and Profiling Plan (Testing and Profiling Plan) for materials that will be disposed of during construction. Testing will occur for all potential contaminants of concern, including CA Title 22 metals, polycyclic aromatic hydrocarbons), volatile organic compounds, herbicides, pesticides, polychlorinated biphenyls, or any other potential contaminants, compliant offsite disposal facility. All excavation activities will be actively monitored by a Registered Environmental Assessor for the potential presence of contaminated soils & compliance with the Testing and Profiling Plan. • A Soil Disposal Plan (Disposal Plan), which will describe the process for excavation, stockpiling, dewatering, treating, loading, and hauling of soil from the site. This plan will be prepared in accordance with the. but not be limited to, segregation into separate piles for waste profile analysis based on organic vapor and visual and odor monitoring A Site Worker Health and Safety Plan (Safety Plan) to ensure	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed. The Soil Management Plan, Soil Testing and Profiling Plan, Soil Disposal Plan, and monitoring activities will provide measures to address potential impacts on flora and fauna and will outline appropriate measures for workers to follow within the Safety Plan. These measures will ensure compliance with relevant regulations and best practices for protecting sensitive habitats during construction activities, as outlined in **MM-HAZ-1**. No changes to the Draft EIR are needed.

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	compliance with 29 CFR Part 120, Hazardous Waste Operations and Emergency Response, regulations for site workers at uncontrolled hazardous waste sites. The Safety Plan will be based on the characterization report and the planned site construction activity to ensure that site workers potentially exposed to contamination in soil are trained, equipped, and monitored during site activities. The training, equipment, and monitoring activities will ensure that workers are not exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR Part 1910.1000. The Safety Plan will be signed by and implemented under the oversight of a California State Certified Industrial Hygienist. How does the "site work health and safety plan" address how site workers will address flora and fauna that will be part of creating the park such as sensitive habitat and encountering birds, bird nests, rattlesnakes, and any other critters?	
I9-19	4.10 Hydrology and Water Quality: Implementation of the project would not result in any potentially significant impacts related to hydrology and water quality. Why is there no indication of how water would be sourced for the continued maintenance of grounds and use in public restroom areas?	Please see the response to comment O8-76. For additional information on water supply assessment, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. No changes to the Draft EIR are needed.
I9-20	4.11 Land Use and Planning: Implementation of the project would not result in any potentially significant impacts related to land use and planning. How do you address land use and planning that is impacted relative to wetlands and protected species? When our home was built adjacent to the proposed park site, the county focused concern of land use and required builder mitigation relative to approval of the land use. What is different in the case of the Park Project?	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) for further details. There is no requirement that an RMP be prepared before the project is approved. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). No changes to the Draft EIR are needed.
I9-21	4.12 Mineral Resources: Implementation of the project would not result in any potentially significant impacts related to mineral resources.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.

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I9-22	4.13 Noise and Vibration Impact-NOI-1: Construction Noise During Installation of the Sewer System. Predicted noise levels associated with construction for the park would comply with the County's 8-hour Leg standard of 75 dBA. However, construction associated with the extension of the sewer system would exceed the County's 8-hour threshold for construction noise. As such mitigation would be required to reduce impacts to less than significant. To address noise impacts from construction of the proposed sewer extension, installation of a barrier that breaks the line of sight between the source and receiver would provide 5 dB noise attenuation (FHWA 2017). How will this impact not only the residents but the flora and fauna directly on site? Does your proposed noise attenuation guarantee that nothing will be harmed or impacted because of the noise?	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I9-23	Mitigation-NOI-1: Install Temporary Sound Barriers. Prior to and during construction activities for the proposed sewer line extension, the construction contractor shall install temporary sound barriers that break the line of sight (a minimum of 10 feet) between construction equipment and noise-sensitive receivers. These sound walls shall be installed at any location where construction is located within 100 feet of the property line of an occupied residence or other noise-sensitive land use, such as schools. We live adjacent to the boundary, what guarantee is there that noise quality wont impact us directly?	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I9-24	Impact-NOI-2: Onsite Operational Noise at the Active Park. Although the Noise Impact Analysis did not identify any significant impacts, a number of best practices and operational controls would be in place during the operation of the Alpine Park and were assumed as part of the analysis. These are based on typical rules and regulations enforced at existing County parks. The Alpine Park was slated to be a Community Park. The quality of life relative to traffic and congestion, impact on intrusive lighting and noise resulting from increased capacity to Park does not truly address the noise that will be generated from increased traffic?	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed.

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I9-25	Mitigation-NOI-2: Enforce Standard Rules and Regulations. County DPR shall enforce all applicable standard rules and regulations for DPR facilities including, but not limited to, the following: • Quiet Hours are from 10:00 p.m. to 7:00 a.m. During discussion about the proposed park in 2019, the Park would close when the sun went down. Why did this change? • Dogs must be licensed and restrained on a leash not longer than 6 feet and attended at all times. (This restriction will not apply to dogs within the designated dog park space.) • No person shall disturb the peace and quiet of a County Park by any loud or unusual noise, or by the sounding of automobile horns or noise-making devices, or by the use of profane, obscene, or abusive language or gestures. • No person shall use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County Park. • The applicable requirements of DPR Policy Number C-06, Noise Regulation in County Parks will be enforced. Mitigation-NOI-3: Set Operational Limits and Restrictions. Except for occasional special events conducted pursuant to a specific permit (conditional use permit, special event permit, etc.), enforce the following operational restrictions: • Prohibit the use of noise-generating equipment (noisemakers, bullhorns, air horns, amplified stereos/radios, etc.) by spectators. The only exception is for official use of the announcer's PA systems or other devices required for proper operation of the intended and approved activities. • End all onsite events no later than 10:00 p.m. During discussion about the proposed park in 2019, the Park would close when the sun went down. Why did this change?	This comment is acknowledged. This comment identifies the requirements of **MM-NOI-2**, which specifies that all onsite events would end no later than 10 p.m. The comment suggests that during public discussions in 2019, it was stated that the hours of operation for the park would extend until sunset. As stated in Chapter 3, *Project Description*, of the Draft EIR, the park would be open to the public from sunrise to sunset. No changes to the Draft EIR are needed.
I9-26	4.14 Population and Housing: Implementation of the project would not result in any potentially significant impacts related to population and housing. When the County approached the	As the site is currently subject to a Semi-Rural Residential (SR-2) land use designation, the use of the project site as a park with

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	community about the Park Project, discussion was also made to increasing density to Alpine. I believe that the Plans for increased density projects was put on hold. An article published in the San Diego Union Tribune by Deborah Sullivan Brennan, the County "supervisors voted to adopt state guidelines for calculating such impacts, which may reduce the traffic and environmental effects of new development…" This said, any housing development will require traffic and congestion analysis as part of its EIR. How does a Park Project, which will draw people from all around the county, not consider population and housing impact relative to its development?	one permanent resident would not induce substantial unplanned population growth. No changes to the Draft EIR are needed.
I9-27	4.15 Public Services: Implementation of the project would not result in any potentially significant impacts related to public services. How so? Increased traffic will require public safety in the form of road and park security. There is no information relative to the increased cost in this area because of the facilities, an onsite living person will not be able to adequately supervise a major Park Project. How is the required public safety going to be managed? Who will be responsible for this? Local sheriffs? Ranger? County? How is this important factor supposed to work?	Please refer to Section 4.15, *Public Services*, of the Draft EIR for information regarding police protection services. The Draft EIR acknowledges that an increase in regional residents and visitors could result in an increased demand on police protection services because a higher density of people to the area could result in more incidents requiring police intervention. However, police and emergency services planning would continue to be coordinated with the County Office of Emergency Services to establish safety protocols. Furthermore, the San Diego Sheriff's Department has a goal of providing one patrol position per 10,000 permanent residents, and the increase in regional residents and visitors to the new amenities at the project site would not be expected to be substantial enough to affect that ratio. No changes to the Draft EIR are needed.
I9-28	4.16 Recreation: Implementation of the project would not result in any potentially significant impacts related to recreation.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.
I9-29	4.17 Transportation and Circulation: Implementation of the project would not result in any potentially significant impacts related to transportation and circulation. This section is probably what brings more attention to the study since the current location has congestion whenever there is excess of 20 cars visiting the current site. On holidays and some weekends, the congestion increases due to inappropriate parking and street circulation. How can the new park not require the appropriate access accommodations without creating a throughput issue?	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The parking lot is designed to absorb the on-street parking that already occurs at the site. Additionally, the park would improve the parking conditions by providing up to 240 designated parking spots for daytime users, thereby reducing or eliminating

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	Who is responsible for managing the anticipated increase in "transportation and circulation?"	the number of existing drivers parking on the street. No changes to the Draft EIR are needed.
I9-30	On the road accessing the proposed Park, there has been 2 recent accidents on South Grade. A hit and run accident on February 11, 2021, involving a 19-year-old pedestrian. Another incident on June 22, 2018, involving a senior citizen that was mortally wounded while exiting the Park site due to inability of driver to have full line of sight as he approached the pedestrian. What transportation and congestion issues are not being evaluated by the EIR since adding 250 plus parking locations will require careful planning and access to and from park? The current road conditions do not align with the anticipated project volume of congestion. The study does not mention this important aspect of the study since it will impact access, congestion, noise, and public safety from a transportation point of view. How can the community be guaranteed that traffic congestion will not be an issue to the point that no Alpine resident or visitor to the park will be able to access and drive to and from the park without any risk of injury?	The project would include up to 240 parking spaces. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I9-31	4.18 Tribal Cultural Resources: Impact-TCR-1: Excavation Related to the Project Would Potentially Damage Tribal Cultural Resources. Ground-disturbing construction activities associated with the project have the potential to unearth unknown TCRs that may be located in the project area. Impacts would be potentially significant. MM-CUL-1; MM-CUL-2; and MM-CUL-3, as described above. MM-TCR-1: Conduct Native American Monitoring. A Kumeyaay Native American monitor shall be present at all areas of proposed ground disturbance during all initial ground disturbance. This monitoring shall occur on an as [1]needed basis and is intended to ensure that Native American concerns are considered during the construction process. Native American monitors would be retained from tribes who have expressed an interest in the project and have participated in discussions with County DPR. If a tribe has been notified of scheduled construction work and does not respond, or if a Native American monitor is not available, work may continue without the Native American monitor. Roles and responsibilities	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.

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	of the Native American monitors shall be detailed in the Cultural Resources Monitoring and Discovery Plan described in MM-CUL-1. Costs associated with Native American monitoring shall be borne by County DPR	
I9-32	4.19 Utilities and Service Systems Impact- Maintenance of the grounds does not specify what the consumption of water and origin thereof will be. No indication of how water would be sourced for the continued maintenance of grounds and use in public restroom areas? UTIL-1: Operation of the Project Has the Potential to Require New or Expanded Water Facilities: Operation of the project would increase demand on water infrastructure serving the project site, potentially requiring the relocation or construction of new or expanded water facilities to serve proposed uses. Construction of these facilities could result in physical impacts on the environment. MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity. Prior to issuance of a building permit, County DPR shall coordinate with PDMWD to assess the capacity of existing water infrastructure that would serve the project site and, if it is determined that insufficient capacity exists to serve the project, the project proponent shall implement the necessary improvements prior to operation of the project, as determined by PDMWD. Should it be determined that the project would result in the need for new or expanded water facilities, the project proponent shall analyze the potential environmental effects of the improvements in accordance with CEQA.	Please see the response to comment O8-76. County DPR is using conservative measurements to assess the capacity of existing water infrastructure that would serve the project site. For additional information on water supply assessment, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I9-33	4.20 Wildfire. Implementation of the project would not result in any potentially significant impacts related to wildfire. We live adjacent to the park and during the 2018 Fire, the fire reached the area where the Park is proposed. How can Wildfire not be a consideration to the EIR of this project? If structures are built, they will be subjected to potential wildfire. Why is this not considered a significant impact?	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.
I9-34	There are 4 Project Alternatives. A semblance of Alternative 4 was the most desired by most Alpine Community Members that	This comment is acknowledged. Please also see MR-11 (Public Outreach) for additional information regarding the County's

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	were involved in the project prior to the purchase of the land. We welcomed the project but were caught off guard when the Alternative model of what the County was proposing is completely different to what the community involved from the beginning was in favor of. We thought at that time, that our voice & vote counted. Recall that Alpine participants had workshops and were separated into groups to evaluate what was desired as the optimal park. Each group provided an overview of what they believe best suited the community. At that time, during 2019, we were all on board and remain on board to a park solution that is less intrusive. Alternative 2, Sports Complex is a regional Park plan opposite of what Alpine residents desired and considered as a community park.	outreach efforts. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I9-35	Alternative 1 – No Project Alternative. Under the No Project Alternative, none of the proposed actions described in Chapter 3, Project Description, would occur at the 96.6-acre project site. The site would remain undeveloped and would not include 25 acres of active recreational uses, including potential multi-use turf areas, a baseball field, an all-wheel park, a bike skills area, recreational courts (i.e., basketball, pickleball, game table plaza), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, an equestrian staging and a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures, picnic tables, and multi-use trails. The creation of a Habitat Conservation Plan for the remaining 71.6 acres would also not occur under this alternative.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.
I9-36	Alternative 2 – Sports Complex Alternative. "Under the Sports Complex Alternative, a greater area of the project site would be allocated to active recreational uses and would include sports fields intended for competitive sports, including club soccer and baseball teams. Under this alternative, a total of 50 acres of the project site would be developed with multi-use turf areas for soccer, etc., as well as baseball fields, and other features described in Section 3.3.1 of Chapter 3, including a skate park and an equestrian staging area. In addition, because this sports complex would be intended to accommodate competitive teams,	Please see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. This comment does not identify specific significant environmental impacts or address the adequacy or accuracy of the EIR. No further response is necessary. No changes to the Draft EIR are needed.

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	extended hours would be allowed and field lighting for nighttime activities would be installed. The number of parking spaces would also be increased to accommodate the increase in parking demand that could occur with the larger active recreational space. The remaining 46 acres of the project site would include open space/conservation area for which a Habitat Conservation Plan would be created." How has a community supported Plan change from 10 to 50 plus acres?	
I9-37	Alternative 3 – Reconfigured Project Alternative. Under this alternative, the area of active recreation would be the same as under the project (25 acres) but moved to the southern portion of the site and with adjustments to the amenities and proposed design of the park. All the active use features would remain, including the multi-use fields, baseball field, basketball, pickleball courts, skate, and bike parks. The picnic areas, equestrian staging, dog park, and community garden areas would remain. The landscaped screening berm would be removed, and the parking lot/drive aisles would be relocated to the interior of the site so that the exterior would remain green-scaped with native vegetation. A walking path would be added to the periphery of the active park area. This alternative would also include conservation of the remaining 71.6 acres of the project site with implementation of a Habitat Conservation Plan.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.
I9-38	Alternative 4 – Reduced Project Alternative. Under the Reduced Project Alternative, the total square footage of the park would be reduced to 20 acres. All the active use features would remain, including the multi-use fields, baseball field, basketball, and pickleball courts, except for the skate and bike parks, which would be eliminated. Passive recreation amenities would remain and would include the equestrian staging area, the multi-use trails, the game table plaza, the dog park, picnic areas, and the community garden, but all at reduced square footages. The remaining area—76.6 acres—would consist of conservation/open space area, including multi-use trails and a Habitat Conservation Plan. This Project Alternative was the one the community of Alpine was led to believe would be the choice	Alternative 4 was not rejected during the consideration of alternatives in Chapter 6, *Alternatives*, and was fully analyzed in the Draft EIR. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. This comment will be shared with the Board of Supervisors to inform its decision. No changes to the Draft EIR are needed.

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	Park Development, what changed when support from Alpine Community during meetings was not for Option 2?	
I9-39	Environmentally Superior Alternative. Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project Alternative (Alternative 1) reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. The Reduced Project Alternative (Alternative 4) reduces the second-largest number of significant impact (see Table 6-3) because, unlike Alternatives 2 and 3, this alternative would reduce the overall acreage of active park space and would also eliminate the bike and skate parks. Alternative 4 would also meet the project objectives.	This comment does not raise specific issues related to the subject noted in the comment. No further response can be provided. No changes to the Draft EIR are needed.
I9-40	Please address our questions being submitted. And consider that we continue to support an Alpine Park Project. We support a less intrusive Park to the current habitat. We've been involved from the beginning of the project and would welcome the same consideration that was provided to us when the Alpine Community first began to have outreach with the San Diego County Park Development Group. Respectfully, Hector & Ann Casas 2542 Engelmann Oak Lane Alpine, CA 91901 760-427-0441	The commenter's preference for a reduced scope alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I9-41	Below are sources of information that was used as reference material to the questions or observations being provided in this letter: Both Federal and State DOT proposed guidelines on non-metropolitan project development. In looking for feedback from Regulatory Agencies, the Department of Transportation at both Federal and State level address the requirement to involve other agencies that will be impacted directly or indirectly from the proposed Park Development Plan. • 23CFR 135(a)-(g) Process of development, nonmetropolitan areas (g)(5) Included Projects, Subsection E, Requirements	This comment contains the sources referenced for the comments above. The comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

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	of anticipated full funding - the transportation improvement program shall include a project, or an identified phase of the project, only if full funding can reasonably be anticipated to be available for the project within the time period contemplated for completion of the project. This regulation stipulates that consideration to the transportation and congestion inherent to a Park Development is required to be addressed. Why is this not addressed since it is important and may require that the current road is amplified to possible a 4 lane road? • Can Diego Union Tribune article by Deborah Sullivan, September 20, 2021. This article addresses the requirement by the county to address the increased traffic inherent to the Park Development and how it must be addressed by the San Diego County Development Group. Why is this not significant to the Park Development? • California Environmental Quality Act. New guidelines under AB 819 (Levine, 2021). These new guidelines that will take effect in January 2022prior to the Park Development require improved communication to all agencies involved in the park development directly and indirectly. Will Alpine Community be provided with the appropriate communication on the project going forward? San Diego County's traffic impact rules could limit new housing in unincorporated areas Faced with a lawsuit by environmental groups, the county voted to adopt stricter rules for evaluating the potential impact of traffic from new developments. BY DEBORAH SULLIVAN BRENNAN SEPT. 20, 2021, 5 AM PT San Diego — "The San Diego County Board of Supervisors recently voted unanimously to rescind its rules for calculating the potential impact of traffic from proposed new housing developments. Instead, the supervisors voted to adopt state guidelines for calculating such impacts, which may reduce the traffic and environmental effects of new development, but it also may make it harder to build in unincorporated areas, county officials said. The Board of Supervisors made the change in	

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	response to lawsuits brought by several environmental groups, who argued that the county's version of the traffic impact rules violated state law. The new rules take effect immediately and will affect housing projects currently in the application process, said Mark Slovick, deputy director for San Diego County Planning and Development Services. The rules set standards for "vehicle miles travelled" or VMT, an estimate of the number and length of vehicle trips that residents who live in a new development are expected to take. The figure indicates the extent of traffic impact and greenhouse gas emissions a development site will generate, so the fewer vehicle miles traveled the better. To get approval for a project, developers must show that their project will generate fewer vehicle miles traveled than the area's average. If they don't, they must show how they will mitigate the traffic impacts, or they must complete an environmental impact report and request an exemption, Slovick said. Under the county's old guidelines, the vehicle miles traveled for new projects in unincorporated county areas were measured against the averages for unincorporated San Diego County. However, state guidelines require developers compare vehicle miles traveled for their project against the average for the entire region, including dense, urban areas. That's a less favorable comparison for back-country housing projects, which have little access to bus lines or other public transit and are often located many miles from employment and shopping centers. Nevertheless, the state's standard is consistent with the county's General Plan, which was updated a decade ago to discourage sprawl development in remote areas and encourage infill housing projects in urban areas near transit. With drivers spending less time on the road, the region could reduce traffic, air pollution and greenhouse gas emissions that contribute to climate change, officials said. Supervisor Terra Lawson-Remer said the process required by state law supports the goal of building new homes near public transit and workplaces. It's a "holistic effort to support transit-effective housing and confront the climate emergency," she said. "It cuts regulations and makes it easier to build in the right places and harder to build in the wrong places." Advocates for the building industry said	

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	tightening the standard to meet state guidelines would halt construction of new homes at a time when the county faces a housing crisis. "This action will result in a moratorium on housing in the unincorporated area," said Lori Holt Pfeiler, President and CEO of the Building Industry Association of San Diego County, adding that it would remove developers' flexibility to try to meet the county's standards. "We do know how to build housing and work with community goals we all have." Environmental advocates urged the county to adopt the state guidelines for calculating vehicle miles travelled, arguing that failure to do so would allow more sprawl development and hasten climate change. "We are in a climate emergency," said Noah Harris, transportation policy advocate with Climate Action Campaign. "Transportation accounts for more than half of greenhouse gas emissions. San Diego is home to some of the most dangerously polluted neighborhoods in the state ... Climate and housing can be addressed together." The county adopted its previous transportation study guide in June 2020. At that time, state law called for agencies to compare the number of vehicle miles travelled to the regionwide average, but it didn't spell out what constitutes a region. So local officials defined it as unincorporated county. Last September the Cleveland National Forest Foundation, the Coastal Environmental Rights Foundation and the Sierra Club filed suit, alleging that the county's guide violated the California Environmental Quality Act and SB 743, the 2013 state law that established the new methodology. In June the Governor's Office of Research and Planning clarified that unincorporated county areas should use standards based on an entire county's average for vehicle miles travelled. That effectively sealed the case for the environmental groups, forcing San Diego County to deal with the matter in a board meeting or in court. Supervisor Jim Desmond said he originally voted for the county guidelines using only unincorporated areas as the basis for vehicle miles traveled and preferred that approach. But he voted in favor of updating the rules Wednesday, noting that the court likely would require that change anyway. "A pure regional model is going to halt all development in our unincorporated area," he said. "Environmental groups don't want any sprawl or	

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	development in unincorporated areas ... I think what staff is presenting today is our best, worst choice. I think it's better to rescind today and avoid this suit, so the county can keep some local control." The changes affect about half a dozen proposed projects that would have met the previous standards but won't meet the updated ones, Slovick said. The county will work with those permit applicants on addressing the new rules, he said. "The law doesn't include any grandfathering provisions for changes like this," he said, "so projects can no longer use the county's guidelines. So, we're meeting with our applicants and will evaluate on a case-by-case basis." The board also directed staff to return in January with ways to streamline regulations for housing developments, officials said." California Environmental Quality Act. New guidelines under AB 819 (Levine, 2021) will take effect on January 1, 2022, and will change various CEQA communication, noticing, and filing requirements, including: • Allowing responsible agencies to be notified via email. (PRC § 21080.4(a).) • Allowing responsible agencies to communicate with the lead agency via email regarding the scope of the environmental review. (PRC § 21080.4(a).) • Requiring lead agencies to submit an electronic copy of DEIRs and proposed negative declarations or mitigated negative declarations to the State Clearinghouse. (PRC § 21082.1(c)(4).) • Requiring lead agencies to post DEIRs, EIRs, negative declarations, or mitigated negative declarations on the lead agency's website. (PRC § 21082.1(d).) • The notices required by Section 21092, 21092.2, 20192.3 must be posted on the lead agency's website in addition to one of the previous options. (PRC § 21092(b)(3); 21092.2(d), 21092.3.) • State agency notices of determination and notices of exemption must be filed electronically with the State	

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	Clearinghouse, which must keep the notice on a public website for 12 months. (PRC § 21108.) • Local agency notices of determination and notices of exemption must be filed electronically with the county clerk if that option is available. (PRC § 21152(d).) • The county clerk may post the notice on its website instead of within the physical office. (PRC § 21152(c).) Incidents on South Grade that brings attention to foreseeable issue with traffic and congestion that is not being addressed in the EIR sections on Public Safety and Traffic and Congestion: • JM Johnson - 02/11/2021 Alpine Pedestrian Hit-and-Run Crash on South Grade Road Alpine Pedestrian Hit-and-Run Crash on South Grade Woman, 19, Severely Injured in Alpine Hit-and-Run on South Grade Road ALPINE, CA (February 10, 2021) – A hit-and-run crash severely injured a pedestrian along South Grade Road in Alpine. According to the San Diego Union-Tribune and ABC 10 News, the accident occurred on Wednesday morning. Officers reported the collision at around 11:15 a.m. The incident happened when a 19-year-old woman was walking southbound along the west road edge of South Grade Road. At the same time, a vehicle was traveling in the same direction. • June 22, 2016 (Alpine) East County News Service-Updated June 24 with information from the CHP— A 64-year-old woman walking her dog was struck and killed by a car this morning at South Grade and Calle de Compadres near Wright's Field in Alpine. The accident caused temporary closure of South Grade Road. • According to the California Highway Patrol spokesman Kevin Pearlstein, the driver, a 57-year-old man from alpine was driving 2004 Honda Civic southbound at 35 to 40 miles per hour when he struck the pedestrian, who appeared to be crossing the road toward her parked vehicle. "Due to the change in elevation of the roadway, the driver of the Honda was unable to avoid the pedestrian who had appeared directly in his path of travel," Pearlstein said, adding that the	

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	driver did apply his brakes but could not avoid the collision. The driver was not injured and was not cited. The tragedy prompted a post on the Alpine Community Network from a resident calling for wider shoulders to protect children walking to school, people walking their dogs and those riding horses from cars driving past at rapid speeds per hour or more. The identity of the victim has not yet been released by authorities. • By Wendy Fry and Laura McVicker - Published June 22, 2016, • Updated on June 23, 2016, at 7:49 pm Flowers Left at Scene of Fatal Pedestrian Crash in Alpine. The Alpine community is mourning the loss of a mother & respected community member who was hit and killed by a car while crossing the street Wednesday. Andrea Smith, 64, was crossing South Grade Road in Calle De Compadres when she was struck by an oncoming Honda Civic. The 57-year-old driver behind the wheel of the Honda was taking his son to school, the family told NBC 7 San Diego. He apparently did not see the woman as she walked toward her parked car because of the change in elevation of the roadway, California Highway Patrol (CHP) officers said. The driver, who has not been identified, was unable to stop in time, officers said. At the time, Smith was crossing the street to get back to her car, parked near a trail head. She had her two dogs with her, who ran away in the chaotic moments after the crash. Smith died at the scene. The driver was not hurt. The driver's wife said he raced out of the car to try and save her, but she was lifeless within seconds. She says he is devastated and feeling burdened. Smith's son said she was a respiratory therapist at Rady Children's Hospital for 20 years and had just retired a few months ago. Community members, shocked by the news, came to the scene of the crash to leave flowers. "It's a big deal because this is a small town and everybody knows everybody and it really hit hard to know that somebody was just crossing the street," said Danielle Pupa, an Alpine resident. An accident re-constructionist was on	

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	scene all Thursday, trying to figure out ways the road could be made safer. "There are pedestrian calculations you can perform based on how far the pedestrian was thrown through the air or depending on the motion ... it's a little bit gruesome but those are tools someone like me will use to figure out what happened," said Dan Toneck, an accident re-constructionist. Alcohol or drugs were not believed to be a factor. Alpine Community Network via Facebook: December 7, 2012 at 1:42 pm The latest info: (from the Union Tribune) UPDATE: 12-7-12 1:38 PM – The latest info from the UT: ALPINE — A 31-year-old Alpine man was killed Thursday night when his truck went out of control on South Grade Road at Via Viejas, the California Highway Patrol said. His name was not yet released pending notification of family. The man was driving a gray 2000 Chevrolet Silverado 1500 pickup westbound about 5:25 p.m. at what witnesses said was a high rate of speed, about 75 mph in a 45-mph zone, CHP Officer Brian Pennings said. The driver failed to maintain control of the truck, which drifted to the right shoulder. He then overcorrected to the left and the truck crossed into the eastbound lane. It hit a cinder block wall and a power pole on the south side of the road, snapping the pole at its base and causing a power outage for three houses, Pennings said.	

Comment Letter I10: Sandy Castle, November 6, 2021

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I10-1	I am so thoroughly against this Huge park/sports complex. Originally, I was all for it as I really want an off leash dog area, but this is not what I signed up for. This is Huge, way too big and not something Alpine wants or needs.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's objection to the project is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I10-2	Listen to the Alpine residents and redefine this to a smaller community park. Where did all this come from? Think of all the	Regarding potential wildlife impacts, please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for an analysis of potential impacts of the project on biological resources and

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	wildlife that will be destroyed, think of all the discontent is already causing...Think of the Traffic.	associated mitigation measures. The section concludes that resultant impacts would be less than significant. Regarding the traffic impact, please refer to Section 4.17, *Transportation and Circulation*, of the Draft EIR for an analysis of potential impacts of the project on traffic and associated mitigation measures. The section concludes that resultant impacts would be less than significant. The commenter's preference for a smaller alternative is noted for the record.
I10-3	Then consider all the water use it will need in this time of drought. Just THINK please...this has gotten way out of hand. Thank you, Sandy Castle...Alpine resident.	Regarding water-related impacts, please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR and MR-15 (Water and Wastewater) for an analysis of potential impacts of the project on water usage and supply and associated mitigation measures. The section concludes that resultant impacts would be less than significant. No changes to the Draft EIR are needed.

Comment Letter I11: John Christine, October 7, 2021

Comment#	Comment Text	Response
I11-1	Hello Anna, this is John Christine, my number is (xxx) xxx-xxxx. I got property adjacent to the Alpine Park Project and it looks like a great deal there. I have a question - are you guys going to be drilling a water well for all this for the turf and other things? My question - are you going to be drilling a water well or does this get served off of the water system? Anyway, thank you for calling me back when you have a chance. You have a great day.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The project would not require the drilling of a new water well; service to the site would be provided from existing sources. For additional information, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please refer to MR-15 (Water and Wastewater) for more information. No changes to the Draft EIR are needed.

Comment Letter I12: Vic and Ramona Cooper, November 15, 2021

Comment#	Comment Text	Response
I12-1	Thank you for the opportunity to comment on the Alpine Park Project's (Projects) Draft Our family has lived in Alpine for four generations starting in the late 30s. I've lived at our resident XXXX South Garage Road since 1960 (South East Corner of the proposed Alpine park) I have attended the very first proposed park meeting with the APG and SD County starting in 2020 and all that followed. I would ask that you include our concerns within the public comments on the current DEIR Sewer, Water, Storm Water Runoff, Environmental concerns' Alpine Proposed Park Vic & Ramona Cooper XXXX South Grade Road (South East corner of the proposed park)	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I12-2	No one has been able to answer my most basic questions from two years ago with letters sent to the APG and the County (*See below*). What is Plan? Sewer no county connection available	Please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR and the response to comment O8-80, above, as well as MR-15 (Water and Wastewater).
I12-3	**Sewer** no county connection available; The land considered for the park has had multiple perk tests over the last 40 years, no developments were ever permitted due to failed perk test. ***Water*** is scarce commodity in all of San Diego East County and it will be a threat to our community with water shortages and water rationing mention almost yearly (Nov. 2021;Caltrans sign I-8 east "Severe Drought Conditions) , drilling a well it's not the answer, ground water levels in Alpine are low already it's very hard for residents to get a permit to drill a well in any area in East County why would the county even propose it?	Please see Section 4.19, *Utilities and Service Systems* and the response to comment O8-80, above, and MR-15 (Water and Wastewater). No changes to the Draft EIR are needed.
I12-4	***Storm Water Runoff*** currently all storm water runoff from the northern end of the proposed park flows on to South Grade Rd. all the runoff goes south through neighboring residence including our property. Currently the storm drains are full of debris and silt. the silt has caused erosion in our own yard and the natural drainage can no longer handle the volume of water	Please refer to MR-15 (Water and Wastewater). Please see Section 4.19, *Utilities and Service Systems*. As stated in the Draft EIR, the project would result in an increase of 7.8 acres in impervious surfaces compared to existing conditions. However, project components including stormwater retention basins, landscaped areas, and berms would infiltrate and capture runoff

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	during strong rains, it causes flooding on both of our driveways as well as neighbors to the east and the west. What will happen with a 250 car parking lot and sports fields you cannot capture the runoff due to the natural terrain	such that an increase in impervious surfaces would not require new or expanded stormwater facilities. Similar to existing conditions, stormwater runoff would continue to infiltrate the pervious surfaces. The project would include an onsite parking lot with up to 240 parking spaces. No changes to the Draft EIR are needed.
I12-5	***Environmental concerns'*** Endangered Habitat, Endangered Species, Quality air control, Quality of life and scenic natural grasslands. San Diego East county is known for natural grass lands, it will never be the same if this project is allowed to continue as proposed devastating the community. APG and the County are showing no concern for the residents of Alpine	This comment does not raise specific issues related to the analysis of the environmental impact topics noted in the comment. Please see MR-3 (Native Grassland Impacts) for more information regarding impacts on grasslands.
I12-6	Our local representatives were shown time and time again thru poling at park meetings the results were clear the residence of Alpine wanted an open space preserve with improved trails limited but safe parking to enhance back country land trust Wright's Field preserve. APG and the county say they listened if they had listened this would not be the project proposed. The fact is they put every item suggested into this 25 acre parcel which I believe anyone with environmental concerns would never let proceed	Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for additional information. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. This comment will be shared with the Board of Supervisors to inform its decision.
I12-7	Below is a sample of letters I've sent expressing our concerns that the proposed park would expand far beyond the Nature Preserve. 01-06-21 Judy.Tjiong-pietrzak@sdcounty.ca.gov Judy, I would like to address some issues regarding the Virtual Public Meeting on 01-14-21. The flyer sent out states after multiple public meetings community feedback and professional consultation created a Parkr Plan, and the concept plan features amenities most desired by our local community. My family and neighbors with homes surrounding Wrights Field were in attendance for all three in person meetings held at the Alpine Community Center, the overwhelming majority at all	This comment is acknowledged. See MR-10 (Passive Park Alternative) for additional information about the passive park alternative that was analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR.

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	meetings supported a nature preserve type park with improved trails and some type of parking. The first virtual public meeting for the park featured a skate park with no other alternatives mentioned and the online questionnaire did not address any options or suggestion other than the skate park.	
I12-8	It looks to me by the pictures presented on the flyer the county is going forward in presenting a version that includes play grounds ball fields witch will require infrastructure to support this type of development	This comment identifies features of the project. The comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I12-9	We have asked and voiced our concerns at every meeting about storm water runoff, lack of existing sewer connection for this type of project, lack of Environmental impact reports and protected plants and wildlife corridor already established for the area. As well as traffic and public safety. No one has addressed those concerns from the county to date. With the Wrights Field Preserve and Findel Ranch Preserve adjacent to the proposed park how does the county plan to protect these designated endangered natural habitats.	This comment raises general concerns regarding stormwater, sewer connections, biological resources, traffic, and public safety. Regarding stormwater impacts, please see the response to comment I12-4. Regarding the lack of existing sewer connection, please see the response to comment O8-80 as well as MR-15 (Water and Wastewater). Regarding biological impacts, please see MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources and MR-6 (Wildlife Corridors) for additional details on how the project could affect wildlife connectivity and corridors. For detailed analyses of specific topics, please see Section 4.10, *Hydrology and Water Quality*, and Section 4.15, *Public Services*, of the Draft EIR and Section 4.4, *Biological Resources*, Section 4.17, *Transportation and Circulation*, and Section 4.20, *Wildfire*, of the RS-Draft EIR.
I12-10	We would like to see these issues addressed prior to any further meetings. Thank you	The County appreciates the comments submitted on the Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I12-11	Vic Cooper Hello Vic! I'm sorry for a delayed response. I remember seeing you at the Alpine Park Public meetings. I realized that there are some questions I haven't been able to answer. We are working around the clock to create a park that	This comment is a response from the County to Vic and Ramona Cooper. No further response is required. No changes to the Draft EIR are needed.

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	can balance and fulfill the needs of the Alpine residents. We are in the process of preparing the California Environmental Quality Act (CEQA) analysis and associated environmental technical reports. When complete, these documents will be available for public review, which will likely occur in the next few months. You will have a chance to comment at that time. Department of Parks and Recreation has a dual mission of providing recreation and preservation. We are working hard to design a project that meets both of these missions. Judy Tjiong-Pietrzak Park Project Manager 858.527.2524 Thank you Vic Cooper & family	

Comment Letter I13: Dain DeForest, November 15, 2021

Comment#	Comment Text	Response
I13-1	I, Dain DeForest, am an Alpine homeowner who has concerns over the construction and maintenance of the proposed Alpine County Park. I believe that this park is too big for the community and will create too much traffic and draw from outside the community. It is not a necessity to have this park here and removes PAMA land, which would be more valuable if kept as is.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for a reduced scope alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I13-2	Most of the mitigation in the DEIR is deferred and therefore not legal under CEQA. I would like to see additional alternatives for a smaller park with more community support that is an environmentally superior alternative. Additional locations should be explored for this project.	Please see MR-4 (Natural Resource Mitigation) for more information regarding biological mitigation. The commenter's preferences for a reduced scope alternative and additional community input are noted for the record. No changes to the Draft EIR are needed.
I13-3	The Department of Parks and Rec did not listen to public input, and instead have proposed a plan that will change the landscape irrevocably. I believe that the DEIR does not properly address the concerns of Biology, Traffic, Noise and GHG pollution.	The commenter's general concerns are noted for the record. The comment does not raise specific issues related to areas mentioned in the comment and, therefore, no further response can be provided. No changes to the Draft EIR are needed.

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I13-4	Please provide evidence for the need of the project. Currently DPR cites a lack of local parkland, yet in this DEIR they cite the project as a "regional" park and have applied for a grant that requires "regional draw" to the project. This regional sized park, is not designed to fill the space of a "local" park in Alpine and therefore that rational cannot be used to create a "need" for parkland. Alpine is doing well as a rural based community and does not need, nor want, these amenities.	Please see MR-12 (Parks Master Plan) for more information about park needs. No changes to the Draft EIR are needed.
I13-5	Please consider this and the response of others as direct opposition to the project, thank you.	The commenter's opposition to the project is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I14: Dana & Kevin de la Torre, November 14, 2021

Comment#	Comment Text	Response
I14-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report (DEIR). By way of introduction, we have lived in Alpine since the 1980's and we have both witnessed and participated in the growth of the Alpine community. Among all of the changes that we have witnessed, no one topic is more important and carries more passion to the community than Wright's Field [which in this context includes both the area owned by the Land Trust and the area the County has purchased]. We have come to appreciate the significance of this area and we understand the balance that needs to be maintained between growth and preservation. In this context we have reviewed the DEIR.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please also see the responses to comments above submitted by BCLT. No further response is required. No changes to the Draft EIR are needed.
I14-2	To begin with, perhaps the one thing that surprises us the most about the DEIR is that it did not consider the alternative that was overwhelmingly proposed by the Alpine community when the County came to Alpine and requested our input. This alternative is most closely described by the one supported by Preserve Alpine's Heritage which is a Nature Based Passive Park. We feel that this proposal captures the support that Alpine has for the County to develop this area but also preserves all of the	The commenter's preference for a Passive Park Alternative is noted for the record. Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details.

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	environmental, native habitat, and socially responsible aspects which are critically important to the community. Therefore at a minimum we strongly recommend and request that you include the Nature Based Passive Park as one of the alternatives for the Board to consider. Additionally, below please find our questions/concerns.	
I14-3	**Section 4.1 Aesthetics and Visual Resources** Threshold 3: We feel that this report does not adequately mitigate the issues identified. The County scope is far too narrow. Shouldn't your analysis consider the impact this has on views from all areas around the project? How does the County propose to mitigate these issues for those with vantage points higher than ground level, which is a substantially greater number of individuals? Threshold 4: We feel that this report does not adequately mitigate the issues identified. The County scope is far too narrow. Shouldn't your analysis consider the impact of lighting in various weather conditions? What impact does this have with fog or rain? Additionally in the summer time the days are longer so what is the environmental impact on wildlife such as coyotes and owls who are nocturnal and are highly active around dusk? How is the County proposing to mitigate this disruption?	Please see the response to comment I9-4. Please also refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR. Figures 4.1-2 through 4.1-6 represent visual simulations developed to represent the visual impacts of the project. See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I14-4	**Section 4.4 Biological Resources** Threshold 1,2,4 & 5: We feel that this report does not adequately mitigate the issues identified. The County proposes to either replace sensitive areas or address identified problems in a reactive or wait and see approach. What is the County going to do if any of these measures fail? How is the County going to restore any destroyed habitats or wildlife if they're proposed solutions are ineffective? Why is the County not considering reducing the scope and or elements of the project to mitigate?	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will be prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. The RMP will be consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). These sections specify that the County will be responsible for managing lands which it owns or acquires within the MSCP preserve system. These sections mandate that the RMP will be written to minimize impacts on MSCP Covered Species and species that share similar habitats. The MSCP is a rigorous program with a prescriptive process that that has been established with mandatory certainty. See MR-4 (Natural

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		Resource Mitigation) for further details. No changes to the Draft EIR are needed. Mitigation for impacts on habitats and special-status species are provided consistent with the County's Biological Mitigation Ordinance and in consultation with CDFW and USFWS. Restoration activities proposed as part of mitigation (e.g., for western spadefoot and QCB) will require adaptive management and that success criteria are met to ensure restoration activities are successful. A reduction in the size of the proposed park would not meet the project's purpose and need, which is for an active use recreational facility.
I14-5	**Section 4.5 Cultural Resources** Threshold 1: We feel that this report does not adequately mitigate the issues identified. The County proposes a reactive or wait and see approach. How is the County going to repair or restore any damage to archeological findings after they have been destroyed during the construction process? What dedicated resources are going to provide 100% oversight to all construction activity? Why is the County not considering reducing the scope and or elements of the project to mitigate?	Multiple cultural resource studies including for the current project have been conducted on the property. Cultural resource surveys identified resources that were then tested and evaluated for their eligibility for the California Register of Historical Resources. Where feasible, sites have been avoided. No significant or California Register of Historical Resources–eligible resources have been identified with the project area. Archaeological monitoring would be conducted in all previously undisturbed soils and within previously identified archaeological site boundaries. Per **MM-CUL-1**, the County will prepare and implement a cultural resource monitoring and discovery plan prior to ground-disturbing activities outlining the procedures to follow in the event of an unanticipated archaeological discovery applicable to all project components. The monitoring and discovery plan will include procedures for evaluation and recovery of archaeological discoveries. No changes to the Draft EIR are needed.
I14-6	**Section 4.7 Geology & Soils** Threshold 5: We feel that this report does not adequately mitigate the issues identified. It is widely known that the soil on this property is not adequate to support septic systems. The report acknowledges the soil issue. Why is the County proposing a wait and see approach when the data indicates that a septic system will not be adequate? Additionally, the extension of the	Please see MR-14 (Geology and Soils). The Geotechnical Evaluation includes infiltration tests. No changes to the Draft EIR are needed.

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	sewer line is a fiscally expensive alternative. Why is the County not considering reducing the scope and or elements of the project to mitigate? Threshold 6: Please see comments from Threshold 5 above.	
I14-7	**Section 4.9 Hazards and Hazardous Materials** Threshold 7: The County has not accessed all of the risks associated with wildland fires. This park is in an extreme fire location due to the topography of the area. How is the County going to mitigate the bottle neck risks created by the park plan in the event of an emergency evacuation?	Please see the responses to comments O8-64, O8-65, and O8-71 and MR-9 (Wildfire) for additional information regarding wildfire response and evacuation, fire-safe landscaping, and other sufficient controls that would be in place to reduce wildfire risks.
I14-8	**Section 4.13 Noise and Vibration** Threshold 1: This report fails to identify how it is going to mitigate the increased noise level generated by certain elements of the park. How is the County going to mitigate the noise created by the skate park? How is the County going to mitigate the noise created by the bike park? How is the County going to mitigate the noise created by the ball fields?	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I14-9	**Section 4.19 Utilities and Service Systems** Threshold 2: Why is the County proposing the development of this property with a relatively high water requirement when water shortages and water conservation have been a critical issue in Southern California for over a decade? Why is the County not considering reducing the scope and or elements of the project to mitigate?	As is noted in Draft EIR Section 4.19, *Utilities and Service Systems*, expected water usage at the project site would not be sufficient to tax the expected available supply. Please refer to MR-15 (Water and Wastewater) for more information. Moreover, conservation measures would be employed to achieve prudent management of onsite water usage. No changes to the Draft EIR are needed.
I14-10	**Section 4.20 Wildfire** Threshold 1: We feel that this report does not adequately address the larger issue that needs to be mitigated. Because of the size of this project and the number of parking spaces, how is the County mitigating the risks created by the increase in traffic pushed onto South Grade Road during an emergency evacuation? What infrastructure improvements is the County making and paying for to handle the influx of cars on South Grade Road during an evacuation? What plans have been finalized between the County and other agencies impacted by this issue?	Please see the responses to comments O2-44 and O8-71. Please also see MR-9 (Wildfire) for additional information regarding wildfire response and evacuation, fire-safe landscaping, and other sufficient controls that would be in place to reduce wildfire risks.

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I14-11	**Section 6 Alternatives** Please note that our comments regarding the alternatives to this project were expressed at the beginning of this letter. However, we do feel that an alternative which aligns most closely with the Nature Based Passive Park proposed by Preserve Alpine's Heritage would substantially mitigate the vast majority of the issues that we feel are interfering with the County's Plan. Please understand that we are very thankful that the County is willing to make a significant investment in Alpine. As accountants we understand the significance of this decision. We feel that the nature of this letter being designed for questioning the project gives the appearance that we don't support the park. In truth we do. However, the preservation of the essence of Wright's Field is critical to the Alpine community. We hope that the County will be mindful of this and reduce the scope and function of the park to adequately address this requirement. Please feel free to contact us at dkdlt@cox.net and we would like to have you send all notices relating to this project to this email.	Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details.

Comment Letter I15: Christine Figari, November 15, 2021

Comment#	Comment Text	Response
I15-1	Dear Ms. Prowant, Thank you for the opportunity to comment on the DEIR for the Alpine Park Project (Project) proposed by the Department of Parks and Recreation (DPR). As a resident of Alpine who travels almost daily along South Grade Road past the Project location, there are several areas on which I'd like to comment.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I15-2	**Section 4.1. Aesthetics and Visual Resources.** Page 4.1-9 states visual impacts are considered significant if the project would result in, among other things, "…a substantial adverse effect on a scenic vista." Page 4.1-13 states, "...implementation of the active park would result in a significant impact." The four simulations created are inadequate 1) to	Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR. Figures 4.1-2 through 4.1-6 represent visual simulations developed to represent the visual impacts of the project. The Draft EIR acknowledges that the project would substantially degrade the existing visual character and quality of public views of the site and its surroundings; however,

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	address the significant impacts the project would have on Alpine's character and identity, and therefore 2) to determine if the mitigation measures are sufficient. With incomplete visual simulations, how can you prove the mitigation measures would reduce the impact to a less-than-significant level?	implementation of **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries** would reduce this impact to a less-than-significant level. No changes to the Draft EIR are needed.
I15-3	• There is no visual simulation of the view facing the Project from the hill in the northeastern portion of the County's property. What will the visual impact be from that location? Please create a visual simulation from that location.	Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR. Figures 4.1-2 through 4.1-6 represent visual simulations developed to represent the visual impacts of the project. These visual simulations were developed for applicable viewing groups pursuant to CEQA visual assessments. No changes to the Draft EIR are needed.
I15-4	• Page 4.1-13 discusses the impact of views from the trails in Wright's Field Preserve. Regarding several elements in the Project, it's stated, "These project features would not include large structures that would completely obstruct views." That indicates some views would be obstructed. What will the visual impact be from the trails? Please create a visual simulation from that location.	Please see the response to comment I15-3, above. No changes to the Draft EIR are needed.
I15-5	• Page 4.1-15 states, "… and photovoltaic (PV) panels that would be installed in the parking lot mounted on overhead structures to power the outdoor lighting". Page 4.19-16 states, "Photovoltaic panels would be installed in the parking lots for lighting throughout the proposed park." What are the dimensions of the PV panels? Where will they be located? What impact will the panels have on the views? Please create a visual simulation that includes the PV panels.	Please see the response to comment I15-3, above. No changes to the Draft EIR are needed.
I15-6	• In Figure 4.1-3 Viejas Mountain is not seen because it's almost completely hidden behind clouds. I'm surprised that this image was used since Viejas Mountain defines Alpine's identity and the view along South Grade Road seems surely to be impacted. See photos on next page: #1 I took in the late afternoon on November 14, 2021, and #2 which appears in the DEIR. Why wasn't an image used that clearly shows the scenic vista of Viejas Mountain? Please create a visual simulation that includes all of Viejas Mountain.	Please see the response to comment I15-3, above. No changes to the Draft EIR are needed.

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I15-7	**Section 4.4. Biological Resources** Page 4.4-15 states, ""The following special-status wildlife species were observed within the BSA during surveys and will be assessed for impacts from implementation of the project…" Page 4.4-16 states, "The following special-status wildlife species were observed within the BSA during surveys and will also be assessed for impacts…" This sounds like DPR is deferring the analysis and I have concerns about that. • Is DPR deferring the analysis of these special-status wildlife? • When will the proper analysis be conducted? • Without an assessment now, how do we know the proper mitigation measures have been/will be proposed?	The species included in the lists on the two pages referenced were included for analysis in the RS-Draft EIR. For clarity, these statements have been revised to "are included in the impact analysis."
I15-8	**Section 4.10. Hydrology and Water Quality** Throughout this section there is incomplete and at times seemingly inconsistent information. 4.10-17 states "Stormwater retention basins would be located throughout the park." Page 4.10-21 states, "There are no existing or planned stormwater drainage systems proposed by the project, nor does the project require such systems." Later, on the same page is, "…the project would include design features including bio-retention basins, for the control of drainage on the site…" and still later on the same page, "Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems…" Figure 3-2 shows only one "Retention Basin." These leave me with several questions. • What stormwater retention basins, stormwater drainage systems and bio-retention basins are planned? • Where will they be located? • In addition to this basic information, there is insufficient detail included (e.g., what groundwork is needed, what surface area impacts will there be, is this considered in the cut/fill estimates, how will the stormwater be directed, where will the pollutants flow) to determine that there are no mitigation measures required. Please include all relevant	Figure 3-2 shows three retention basins, which is consistent with page 4.10-17, which states that "stormwater retention basins would be located throughout the park." As stated in the Draft EIR, the project would result in an increase of 7.8 acres in impervious surfaces compared to existing conditions. However, project components including stormwater retention basins, landscaped areas, and berms would infiltrate and capture runoff such that an increase in impervious surfaces would not require new or expanded stormwater facilities. Similar to existing conditions, stormwater runoff would continue to infiltrate the pervious surfaces. Section 4.10, *Hydrology and Water Quality*, of the Draft EIR states that construction of the project would require ground-disturbing activities, approximately 21.75 acres of grading, and 47,200 cubic yards of soil excavation. The analysis provided in Section 4.10 is not complete or inconsistent. No changes to the Draft EIR are needed.

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	information to prove the impact analysis and determination is correct and there is no mitigation required.	
I15-9	**Section 4.19. Utilities and Service Systems** Page 4.19-18 states, "Therefore, given this uncertainty regarding available water supply, which is necessary for operation of the project, potential impacts are considered to be significant." The mitigation measure for this is, "Water availability shall be confirmed prior to issuance of building permits. The confirmation of water availability by PDMWD shall be provided in written form by PDMWD." • If it's determined that there is not enough water available, what are the mitigation measures? • As written, the mitigation measure is insufficient. As written, how does this prove that the impacts would be reduced to less than significant levels?	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Implementation of **MM-UTIL-1** would ensure construction of sufficient water infrastructure and reduce impacts to a less-than-significant level. **MM-UTIL-1** is sufficient, and no changes to the Draft EIR are needed.
I15-10	**Chapter 6: Project Alternatives** Page 6-4 states, "Alternatives that were carried forward and analyzed below provide variations to adjust various components of the project that would help reduce environmental impacts." Table 6-2 summarizes the buildout acreages for the four alternatives that were carried forward. Alternative 2, "Sports Complex Alternative" would significantly increase the Active Park Acreage and significantly decrease the Open Space/Conservation Acreage. The description of Alternative 2 on Page 6-5 states, "...extended hours would be allowed and field lighting for nighttime activities would be installed. The number of parking spaces would also be increased to accommodate the increase in parking demand that could occur with the larger active recreational space." • What elements of Alternative 2 would "…help reduce environmental impacts"?	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and a discussion of alternative locations "that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines Section 15126.6(f)(2)(BA)). Alternative 2 would result in substantially greater impacts related to aesthetics and visual resources. However, Alternative 2 would meet all of the project objectives because it would create a community gathering place, enhancing the quality and life and public health of the community, and accommodating a variety of active and passive recreational uses; while it would not provide as much conservation/open space area as the project, it would still accommodate the objective of preserving natural and cultural resources through the provision of 46.6 acres of conservation area.
I15-11	A significant number of the NOP commentators requested alternatives that would be smaller and nature-based. This type of park was not included in the alternatives. Alternative 4, "Reduced Park Alternative" only slightly decreases the Active	The Passive Park Alternative was included in the RS-Draft EIR. This alternative includes a smaller, nature-based park. Please see MR-10 (Passive Park Alternative) for additional information.

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	Park Acreage and still contains elements that have significant environmental impact (e.g., aesthetics, traffic, biological resources, geology, water supplies). • Properly designed, a smaller, nature-based park would meet the project objectives and have a significantly lower environmental impact. Why was a smaller, nature-based park not included as an alternative, especially given the comments in the NOP and, from DPR's own data, the desires of the majority of residents who attended the first two public meetings in Alpine? • Please include an alternative for a smaller, nature-based park.	

Comment Letter I16: Robert Figari, November 15, 2021

Comment#	Comment Text	Response
I16-1	I have emailed both MSWord and pdf document copies to you as my formal response to the DEIR for the Alpine County Park Project. I trust you will transmit it to the appropriate parties. It would be helpful if you could please provide by return email a notice of receipt of the document. Thank you for your help.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I16-2	Background: The DEIR includes many population estimates that do not agree at all with US Census Bureau results. The US Census Bureau reports significantly less population in Alpine than the DEIR uses. This is important because Section 14.1 Population and Housing, the Existing Conditions and Projected Population data (Table 4.14-1. Existing and Projected Population in Unincorporated San Diego County) form the basis in determining both Threshold 1 and 2 impact and mitigation factors in that DEIR section as well as other parts of the document. For example, Table 4.14-1. of the DEIR titled Existing and Projected Population in Unincorporated San Diego County provides the basis for population estimates used in the DEIR. Alpine population is pegged at 17,609 in 2010 based upon "The	CEQA Guidelines Section 15125(a)(1) states "the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published." The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model when the NOP was posted on March 30, 2021. Additionally, the first set of data from the 2020 Census, which included only population data at the state level, was not released until April 26, 2021 (U.S. Census Bureau 2023). More detailed population data were not released until August 2021. As such, the 2020 Census data were not available at the time the NOP was published and for that reason was not used in Draft EIR. Additionally, the 2020 Census and SANDAG Series 14 project a lower growth in the CPA. Therefore, the Draft EIR and the LOS-

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	2010 San Diego Association of Governments (SANDAG) estimates for population and housing in the Alpine CPA identify a population of 17,609 with a total of 6,551 housing units (County of San Diego 1979)". According to the 2020 United States Census Bureau results for Alpine (CDP), CA (https://www.census.gov/quickfacts/fact/table/alpinecdpcalifornia/POP010220#POP010220), the current population is 14,696. And in 2010 Alpine's population was recorded as 14,236. The SANDAG 2010 estimate more than 20% higher than the Census Bureau 2020 result! In terms of increase, according to the Census Bureau the increase in Alpine's population was only 3% over 10 years. The SANDAG population estimates of 17,609 in 2010 (which DPR uses as a population basis in the DEIR) are grossly inaccurate and overstate the population by 20% compared to the 2020 US Census Bureau results. Request: • Regarding section 4.16.3.3 of the DEIR where reference is made to "the central Alpine area" (a location term that appears throughout the DEIR), I could find no definition or map that explains or illustrates what exactly is considered "central Alpine". Please provide specific information on what is meant by that term and where it originated from. • Why did DPR and DEIR not use the latest census data included in the 2020 US Census Bureau results as the basis for the DEIR instead of the 2010 SANDAG estimates? • Please explain what current population figures the DEIR used for Alpine • Please explain how those current population figures were arrived at. • Please explain how DPR arrived at the statement in section 4.16.3.3 of the DEIR that begins with "Because the population is expected to increase". What is the rate of increase DPR is projecting? What is the starting date and source and what are the projected dates and source that show that expected increase? And what are the expected results? • Please provide calculations of the effect on Threshold 1 and 2 impact and mitigation factors if the Census Bureau data is used in place of whatever other source was used. What would the effect be if the 2010, 2020 and 2050 population figures the DEIR is based upon are are 30% too high? • Please explain how the initial 2010 population figures SANDAG developed could be 20% higher than what the Census Bureau	based traffic impact study utilized a much more conservative value when projecting future traffic. Please also refer to MR-12 (Parks Master Plan) for information on park needs in the Alpine community. No changes to the Draft EIR are needed.

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	published. • The Census Bureau population figures for Alpine for 2010 to 2020 increased just 3%. The DEIR is projecting a 36.1% increase for unincorporated areas from 2010 to 2050. What is the projected percentage increase for Alpine for 2010 to 2050? How was this number arrived at? How do you reconcile the much higher projected 2010 DEIR increases with the low Census Bureau increases? • If the Alpine population figures the DEIR is using for 2010, 2020 and 2050 for Alpine are actually (as suggested by the Census Bureau figures) 20-30% too high, what would the effect be on the entire DEIR?	
I16-3	To satisfy the community gatherings objective, why couldn't, for example, an amphitheater be built at the proposed location for community gatherings and the other park elements be created in other locations (skatepark downtown, horse center further out, joint-use of baseball fields, etc.). This approach would certainly meet the second objective of active and passive recreation. This approach would obviously devote more of the proposed park land for the MSCP preservation. The preserve/integrate natural features objective wouldn't be affected by this approach. With the increasing population, the quality of life would be enhanced far more by having smaller parks available to a wider community that do not require auto travel. And regarding the last three objectives, I do not how this approach would not meet the objectives. Request: • Please provide substantiation for this statement in specific reference to each objective and in the context of my comments below. • And please explain in more detail why this option was rejected.	Please see the response to comment O8-101.
I16-4	Re: "This alternative also would not enable long-term natural and cultural resources management." Request: • How would this approach "not enable long-term natural and cultural resources management"? • How do you define "long-term natural and cultural resources management"?	The Alternate Location Alternative would not include a Habitat Conservation Plan. The project would have additional onsite daily management for both the park and the open space. In addition, although the trails would be available for use by the public under both the project and Alternative 5, trash cans would be emptied daily to prevent trash from accumulating; therefore, staff members would be on site daily. Furthermore, the larger designated parking area featuring 240 parking spaces, with staff on site, would prevent the public from parking on open space land and thereby potentially negatively affecting the

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		natural and cultural resources that could occur with Alternative 5. Alternative 5 would involve a small parking area without staff members on site to ensure that the public parks in the designated area. The project would create a walking path along the north side of South Grade Road, along County property, and a four-way stop with crosswalks, allowing the public to access the trails through designated routes without crossing through the proposed open space land in the south to access the trails. In addition, the project would include native grassland restoration that would benefit QCB habitat through the removal of nonnative invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field. The Alpine Community Park project includes both conservation and management plans that would restore and manage habitat in perpetuity consistent with the County's MSCP. In addition, the Alternate Location Alternative would not include an onsite County Staff member to prevent the public from affecting sensitive resources. The Alternate Location Alternative would not provide contiguous natural resource management. By providing a community park, the project can be developed to locate active park elements away from natural and cultural resources. In addition, this alternative was deemed infeasible because the County does not own other properties in Alpine, which prohibits the implementation of parkland in the community within a reasonable amount of time. No changes to the Draft EIR are needed.
I16-5	Re: "Furthermore, this alternative does not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time." Request: • Why would this approach not be feasible now under CEQUA, especially if it would improve the environmental concerns of developing such a concentrated swath of native land? • According to rough maps the County provides of potential park locations, it appears many of the sites considered are already	Please see the responses to comments I16-3 and I16-4 above. No changes to the Draft EIR are needed.

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	somewhat developed and less sensitive environmentally, so please provide specific reasons for why each site was rejected. (Ownership identification is not necessary) • What does current ownership of properties have to do with determining alternatives for creating a new park? • Did DPR ever consider this alternative before it was committed to the current proposal or was it only considered when Alpine citizens asked for it after the DPR developed its own plan? • Why did the County buy the current land before determining what park attributes or elements the citizens of the Alpine CPA want? Why did the County buy the current land before examining the multi-park approach and considering other potential park sites less environmentally sensitive?	
I16-6	DPR presents four alternatives to the proposed plan in the DEIR. Under CEQUA guidelines, DPR does not have to consider all possible alternatives, but has an obligation to present alternatives that are reasonable, appear to be feasible, and would avoid or substantially lessen at least one of the project's significant environmental effects. For reasons difficult to understand, DPR did not include as an alternative, the recommendations made in the San Diego County Parks Master Plan (PMP) which would significantly lessen environmental effects. And, even stranger, DPR did not include as an alternative, the plan recommendations gathered from participants in the DPR's initial Alpine public outreach efforts. It is important to note that these initial sessions were very open brainstorming sessions and occurred before DPR began interjecting many of its own park proposal elements into subsequent outreach sessions. The park element recommendations of the Alpine residents in these initial outreach meetings not only lessen environmental effects, but also echoed precisely what the PMP research process recommended. What follows is the source material supporting what is stated in the previous paragraphs. Specifically, in section 4.16.3.3 of the DEIR, it is stated that "The County's PMP [Parks Master Plan] serves as a guidance document for the acquisition and development of future parks and recreation facilities in the unincorporated county." Starting on pg 42, this PMP guidance	Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for additional details on the Passive Park Alternative. Please also see MR-12 (Parks Master Plan) for more information regarding park needs.

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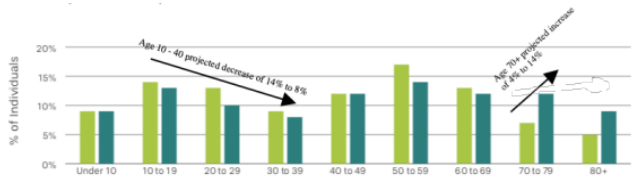
	document presents the "existing (2014) and projected (2040) trends (ethnicity, age, and median household income) and provides an understanding of future demands for each CPA in the County". The Sociodemographic Trends for the Alpine Community Plan Area (CPA) as stated in the PMP guidance document includes: 2. There is projected to be fewer residents ages 0-69 and more residents ages 70 and older. 5. Population density is projected to increase by 61% in the central Alpine CPA. This same data is provided graphically on pg. 43 (with my notations):  This graph clearly illustrates exactly what the PMP Sociodemographic Trends states: the decrease in the younger child and adult population that would typically be more inclined toward a park with "active" elements and the strong trend toward more older adults that would typically be more inclined toward a park with less active and more "passive" elements. Based upon these researched trends, your PMP guidance document then provides Future Recommendations: 1. Consistent with projected demographics, provide opportunities for running, jogging, fishing, road biking, mountain biking, camping, and hiking. 2. Due to a projected increase in residents ages 70 and older, provide fitness programs, like aerobics classes. 3. Due to a projected increase in population density in the central Alpine CPA, consider intensifying services in this area. 4. Due to a projected decrease in population density in the area surrounding the central Alpine CPA, consider reducing services in this area. Also, the DEIR states in Section 14.6.3.3 that "Because the population is expected to increase, the PMP recommended the development of additional running, fishing, road biking, mountain biking, camping, and hiking facilities and the intensification of recreational services in the central Alpine area where population is expected to increase most." The online	

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	DPR Alpine Public Outreach Summary provides the results of the initial surveys. These are the direct quotes from the summary (boldface/underline added for clarity): "The results of the questionnaire revealed the top five activities the responders selected were walking/jogging, riding a mountain bike on a trail/in a park, nature, dog park, and picnicking. The 5 activities with the fewest votes were swimming pool, football, softball, bocce ball, and tennis/pickleball." As you can see, what Alpine residents desire mirrors what the PMP research recommends: mostly passive and mid active elements. Why wasn't some form of this missing alternative included in the DEIR since it represents both the research of the PMP and the will of the people of Alpine? It is a popular, reasonable, feasible alternative that would lessen the environmental impact and meet the stated project objectives. Request: • Please provide substantiation in your responses to my specific questions and in the context of the background information provided above • Why doesn't the DEIR include an alternative that represents the recommendations of the County PMP? • Why were the Sociodemographic Trends appearing in the County PMP not featured in creating the proposed plan or at the very least in an alternative plan? • Why were the Future Recommendation appearing in the County PMP not featured in creating the proposed plan or at the very least in an alternative plan? • Why is there not an alternative that represents the recommendations submitted by Alpine residents at the initial outreach sessions before DPR interjected their own active park elements? • Why were the known preferences of Alpine residents from the initial public outreach not featured in an alternative park plan?	
I16-7	Hazardous Materials: Given the number of acres devoted to artificial turf and natural grass, I'm concerned about hazardous chemicals and pesticides needed to install and maintain the surfaces in good condition. I request to see an analysis of the chemicals and pesticides that will be used over the life of the park and the impact on, among others, neighboring wells, surrounding watersheds and biological resources. Biological	Language has been added to the RS-Draft EIR specifying that herbicide and pesticide application be addressed within the RMP to minimize impacts on special-status species. Garbage and trash management has been addressed within the RS-Draft EIR. A full-time, live-on volunteer would be present to minimize risks of trash and garbage becoming an attractive nuisance for animal pests. Language has been added to the RS-Draft EIR to reflect

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	Resources: In addition to an analysis of the impact of hazardous materials (chemicals and pesticides used on the artificial turf and natural grass) on biological resources, the EIR should include a thorough analysis of the other direct and indirect effects on biological resources, such as the introduction of gophers, moles, skunks and other non-native species. In the EIR I request that: 1) all of the aforementioned concerns be thoroughly analyzed, and that 2) the impacts of these concerns are avoided or mitigated below the level of significance. Request: • As before, I request the aforementioned concerns be thoroughly analyzed and proof of such be provided to me or included in a revised DEIR. • And I request that these concerns are avoided or mitigated below the level of significance. • I'm particularly interested in research you have conducted on the effect of an increased population of such "pests" as gophers, moles, skunks, and other somewhat pernicious critters due to the introduction of human garbage and public use debris. • If you have not done such research, then please do so. The impact of the critters and the control techniques you employ needs to be determined in this DEIR. • Please provide what critters you expect to invade the park, what population levels you anticipate and what steps you will take in controlling them.	this. Hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides, would not be stored or used in quantities that would result in a significant release. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, state, and local regulations. A full-time park ranger, live-on volunteer, and two maintenance staff would be present to minimize risks of trash and garbage becoming an attractive nuisance for animal pests. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I17: SL Forsburg, November 15, 2021

Comment#	Comment Text	Response
I17-1	As a regular hiker and outdoor enthusiast, I am opposed to the overzealous park proposal in Alpine that will destroy 24 acres of healthy open space natural lands and habitat along the edge of a wildlife preserve, and replace it with unsustainable non-native lawns and concrete paths.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for retaining the existing site usage is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I17-2	Not only is this destructive of open space but is irresponsible use of water!	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please

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		refer to Section 4.19, *Utilities and Service Systems*. No changes to the Draft EIR are needed.

Comment Letter I18: Rafael Fregoso, November 15, 2021

Comment#	Comment Text	Response
I18-1	I live adjacent to The proposed park area, actually right next to where the proposed hundreds of parking spaces are to be built. We just want a small nature-based park. The chances of no park being built at all are unlikely, so present points on why the proposed park is not the right option.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for a reduced scope alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I18-2	How are you going to prevent vehicle accident with hundreds of vehicles coming out of the park every day ?	While the trip generation analysis does show up to 480 trips (240 vehicles), the PM peak-hour trip generation, which is the highest peak, shows only 20 inbound trips and 19 outbound trips. This is less than 1 trip every 3 minutes; as such, the project driveways would be able to handle the number of vehicles. Please refer to MR-7 (Transportation and Safety) for information regarding project access. No changes to the Draft EIR are needed.
I18-3	How about vehicle noice pollution for us and all residents that live around the proposed park. How is that going to be controlled?	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I18-4	Why a sports complex when all we want is a nature base park to continue using existing trails. Why ?	The commenter's preference for a passive park alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I19: Michael Funtas, November 17, 2021

Comment#	Comment Text	Response
I19-1	I am writing to ask you to reconsider the location of the baseball diamond in the new park. According to the maps, the diamond is in the middle of the park and is a feature that will only be used	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final

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	20 to 30 days out of the year at most. I think it belongs at the south end of the park. Let's face it, 9 months out of the year, kids will be in school until 3:30 or 4:00. Seniors will be using the park when the kids are not there. Let's keep those seniors in mind.	EIR for the project. The commenter's recommendation for location of the baseball diamond will be considered as the design process moves forward. No changes to the Draft EIR are needed.
I19-2	Additionally, we support a reduced size to the park as in the original proposal. This is not the right location for a Regional Park of this size.	The commenter's preference for a reduced scope alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I20: Christina & Aaron Furasek, November 5, 2021

Comment#	Comment Text	Response
I20-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report (DEIR). My husband and I just moved to Alpine in January of this year and we love it here. The wild, untouched open space is what brought us here from San Diego.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I20-2	We oppose the proposed Alpine Park as written in the DEIR. A small, nature-based passive park is what we and the majority of the Alpine community wants. We are very disappointed that this alternative was not analyzed as an alternative. We would like you to produce a Final DEIR that contains this option and to take all of these options to the Board of Supervisors so that they can choose a park that the community wants.	The commenter's preference for a passive park alternative is noted for the record. Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details.
I20-3	We don't want a skate park. We don't want a mega park that requires a ton of water. The proposed park will bring too much traffic to the already dangerous South Grade Road.	The commenter's preference for a reduced scope alternative, without an skate park, is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I20-4	Thank you for taking our input. Please send all notices relating to this project to christinahanson66@yahoo.com.	The County appreciates the comments submitted on the Draft EIR. These comments and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I21: Jon Green, November 15, 2021

Comment#	Comment Text	Response
I21-1	This letter is submitted as public comment to the Draft Environmental Impact Report (DEIR) regarding the proposed Alpine County Park at 2480 South Grade Road in Alpine, CA. Thank you for the opportunity to comment on this proposal. For background, I worked for the Back Country Land Trust of San Diego County (BCLT) for the last 10 years, since 2011 serving as the full-time land manager of the 245-acre ecological preserve owned and managed by BCLT known as Wright's Field MSCP Preserve. This acreage was saved from development by a local group of citizen activists in the 1990's due to the high ecological and cultural value of this land, and the discovery of threatened and endangered species on this property, many of which remain on site and thriving today thanks to this land being preserved in perpetuity by the founders of BCLT. At that time, and for many subsequent years afterward, including as recently as 2009, the County of San Diego was an active advocate for the preservation of this property, stating in a letter: *"Due to the significant and not mitigable impacts to biological resources for Alternative B (Wright's Field) and the direct implications to the County's Multiple Species Conservation Plan, the County cannot recommend that this site be chosen for such an intensive land use. Study Area B is located within the County's Wright's Field Pre-Approved Mitigation Area (PAMA) and adjacent to Wright's Field Preserve, an integral part of the County of San Diego's South County Multiple Species Conservation Program (MSCP) Subarea Plan.") - DPLU/ DPW/ DPR, dated 2/20/2009"*	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's remarks are noted for the record. The comment does not reference any specific issues discussed in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I21-2	This all begs the question - what has changed? Certainly not the biological importance of this ecologically rich area. Not the critical nature of preserving land for wildlife habitat, outdoor recreation, and ecosystem services. Not the community's enjoyment or appreciation of this beautiful open-space land in the center of town. If anything these values have all increased in a world where climate change and drought are now dominating factors; in a state where the governor has set a goal of conserving 30 percent of our land area by 2030; and in a county	This comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. The commenter's concern for preservation of sensitive biological resources is noted for the record. Such concerns are addressed in Draft EIR Section 4.4, *Biological Resources.* Also noted is the commenter's opposition to the project. No changes to the Draft EIR are needed.

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	where climate-neutral planning is the order of the day and where increasing development in the rural areas makes open-space lands even more valuable for residents and wildlife both. Unfortunately, the current proposal for the Alpine County park is simply business as usual - a 20th century park design, based on policies and regulations that are increasingly out-of-date and out-of touch with the realities of the 21st century.	
I21-3	It is completely unthinkable that in the year 2021, with the effects of climate change on the rise, a prolonged drought with no end in sight, and historic wildfires happening year after year all over the state, that this current park alternative would simply ignore many, if not all, of those stark realities. It is unimaginable to many of us who live in Alpine that the County staff and supervisors would propose such a large, resource-intensive parkland at such an enormous cost to County taxpayers for the construction, and long-term operations and maintenance, of an already outdated park design.	For the commenter's concern regarding the potential effects of climate change, please see Draft EIR Section 4.8, *Greenhouse Gas Emissions and Climate Change*, and MR-8 (Greenhouse Gases and Energy). For the stated concern regarding wildfires, please see RS-Draft EIR Section 4.20, *Wildfire*, and MR-9 (Wildfire).
I21-4	This is made substantially worse by the location and proposal to build over such unique habitats as the threatened and increasingly rare valley needle grass habitats and Engelmann Oak woodlands. Impacts to wildlife, both flora and fauna, will be significant and unmitigable. Impacts to residents, both human and non-human, will be significant and unmitigable. Please consider an alternative to the current park design and modify the footprint and amenities proposed in the project.	Please refer to MR-3 (Native Grassland Impacts) for additional information on native grasslands. Based on the analysis presented in the Draft EIR and revisions made in the RS-Draft EIR for biological resources, significant impacts on biological resources are mitigated to a less-than-significant level.
I21-5	*"I cannot think of a more tasteless undertaking than to plant trees in a naturally treeless area, and to impose an interpretation of natural beauty on a great landscape that is charged with beauty and wonder, and the excellence of eternity." - Ansel Adams, in an open letter addressed to a Boy Scouts of America proposal to plant trees on Point Reyes National Seashore.*	This comment is acknowledged. This comment does not raise specific issues related to the analysis of environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I21-6	**Preferred Alternative(s)** In the absence of a project alternative vocally requested by the community residents and visitors to this property of a smaller, passive park at this site, and/or a system of smaller parks with the developed portions of Alpine, the remaining alternatives	The commenter's preference for a passive park alternative is noted for the record. Please refer to MR-10 (Passive Park Alternative). Please also see the response to comment I1-2 regarding consideration of alternative sites.

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	outlined in the DEIR, I must conclude that either Project Alternative 1 or Project Alternative 4 are the preferred alternatives for this project. A small, nature-based park is what the community of Alpine has been asking for throughout the public input process. Why is there no project alternative included that examines alternative sites? Why was a small, passive-use park not considered as a project alternative at all? Of the project alternatives outlined in the DEIR, Alternative 1 and/or Alternative 4 are clearly the preferred alternatives at this ecologically valuable and unique landscape, as a smaller, less resource intensive park will have fewer environmental impacts on the surrounding habitats.	
I21-7	**Water Use** The current design with hundreds of trees, several acres of irrigated landscape, and several more acres devoted to non-native turf grass will require huge amounts of water, especially in the hot, arid climate of Alpine. If municipal water is provided via Padre Dam, its cost, estimated at over $135,000 dollars per year, will be a significant burden on taxpayers indefinitely - especially with water rates predicted to increase annually in the future. The use of potable water for irrigation is extremely misguided in San Diego County where such water is precious and mostly imported from outside of the region via costly water infrastructure. Will the County be utilizing reclaimed water (purple pipes) for any irrigation needs of this project? Will the County be considering a downsized area where irrigation is needed?	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems*. Water use for the project would be reduced through water conservation measures. PDMWD would continue to implement existing water conservation measures identified in its UWMP, as required by the Water Conservation Act of 2020. The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to help reduce overall water demands within the PDMWD service area. Landscape design would include the installation of drought-tolerant native plants to reduce water demands for irrigation. Furthermore, water demand for irrigation would decrease over time as vegetation root systems are established. The consideration of utilizing reclaimed water for irrigation will be reviewed at time of construction. No changes to the Draft EIR are needed.
I21-8	Should a well be drilled to supply this park with water, the County should drill test wells to establish how much water is available in this area and design the park accordingly. Assuming that wells will perform as needed has proved a poor assumption for many homeowners in Alpine in the past. Water wells throughout Alpine are drying up due to years of prolonged drought and an overdraft on the existing water table, which is lowered each year due to inadequate recharge rates. Should a	As stated in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, the project does not include any wells to pump groundwater. PDMWD would provide water service to the project site. Please see the response to comment I21-7 above for a discussion on water conservation measures included in the project. No changes to the Draft EIR are needed.

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	water well be drilled for this project, will a full environmental impact study be conducted to examine the potential effects on the surrounding groundwater table? Will a hydrologic assessment be done to analyze the impacts to private homeowners and existing wellheads nearby? What longterm solutions are being proposed for irrigated areas to be sustainable in the future given the current environmental conditions of climate change, drought, and increasing temperatures in the East County?	
I21-9	**Wildfire** The DEIR states that there will be no significant impact on wildfire conditions nor an increase to the current threat of wildfire. This is an inadequate assessment of this topic. According to the "Proposed Alpine County Regional Park Fire and Emergency Operational Assessment" prepared by Rhode Associates in 2020: *"The Community of Alpine is situated to arguably pose one of the worst Wildland-Urban Interface conditions in the County of San Diego and is in a known location of repetitious major wildfire occurrence. Such locations of repeat occurrence are known as "historical wildfire corridors"* How will the increased use of this property not present a significant increase to wildfire threat, especially given the hot, arid conditions at the project location, it's exposure to Santa Ana wind conditions, and the known historical destructiveness of wildfire in Alpine?	Please refer to MR-9 (Wildfire) for more information regarding wildfire response and evacuation, fire-safe landscaping, and other sufficient controls that would be in place to reduce wildfire risks.
I21-10	In addition to the increased risk of ignition just by the sheer increase in volume of human activity, there are some other points of negligence in the current project proposal. Water storage for firefighting is not included in the current design; no fire access or hydrants are provided at the eastern edge of the parkland to defend against a Santa Ana driven westward flame front pushing into the preserved portions of the grassland; BBQ pit installation is not only completely tone-deaf to the realities of Southern California in the 21st century, but also creates an unnecessary amenity that no one asked for, as well as an unnecessary risk of ignition due to mismanagement of hot coals and/or other type of public behavior risks. The benefits of	Please see the response to comment I21-9. Please also refer to Section 4.20, *Wildfire*, of the RS-Draft EIR for additional information on rules that would be enforced by park employees and include, but not be limited to, the enforcement of "Open Flame Bans" that are initiated by the declaration of a Red Flag Warning. When a warning is issued, Region Managers reach out to field staff and begin the process of shutting down all BBQs by signing and banning/taping them off 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.

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	providing BBQ pits just simply don't outweigh the risks of a wildfire igniting at this location. What is the basis for including BBQ pits in this park design, i.e. where is the data and/or public input showing a need for this type of amenity? What level of legal liability will the County assume should a wildfire occur from use of the BBQ pits by the public at this project site?	
I21-11	Another serious concern, from an operational standpoint, is that the fire assessment done by Rhode and Associates assumes the emergency response will be a fairly short interval from fire station to the park site to douse any conflagration there. This fast response assumes that emergency responders are available immediately and not delayed en route to the park site. Should there be another simultaneous emergency or first responders are otherwise unavailable to respond immediately, the response time (and thus, the burn time of a wildfire and risk of spreading off site, become much more dangerous than the current assessment predicts in an immediate-response scenario. During the 2018 West Fire cleanup phase, an emergency responder told me, "If this fire had gotten into the grasslands, we couldn't have physically moved our equipment from South Grade Road (the line of defense) to Tavern Road fast enough to get in front of the flames." How will these significant wildfire risks be mitigated and/or avoided altogether? What is the average response time for emergency response agencies to arrive at the project site in the event of a wildfire? What is the response time for emergency response agencies to arrive at the project site in the event of a wildfire if these agencies are already on scene at another incident?	Please see the response to comment I21-9. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR and the FEOA included as Appendix J of the RS-Draft EIR for information concerning wildfire risks and emergency response agencies.
I21-12	Given that the vast majority of wildfire events are human-caused, introducing 500 people per day (approx. 10 times the current amount of recreational use of this property), will by sheer volume of use increase the risk of ignition of a human-caused wildfires in this area. Whether that be from cars parking illegally on dried grasses, a carelessly tossed cigarette butt, or a mismanaged BBQ pit, the risk of igniting a wildfire in or near this park will be increased simply through multiplication of human activity, potentially proportionate to the proposed increase of 10	Please see the response to comment I21-9. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR and the FEOA included as Appendix J of the RS-Draft EIR for information concerning the implementation of rules and regulations that would reduce the potential for the project to exacerbate wildfire risks.

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	times the current level of use. That means 10 times the current risk of wildfire ignition compared to today's current use of the property. How can the County seriously mitigate the risk of a wildfire in this area of Alpine while simultaneously increasing use of the property ten-fold? How can providing public BBQ pits in a dry grassland not present a significant increase in the risk of wildfire?	
I21-13	Given that this area is for most of the year a dry grassland, the risk of wildfire spreading from the park site into the adjacent preserved lands is significant. The most likely wildfire scenario is that a Santa Ana wind event from the east catches a spark that then blows westward out of the active park footprint and into the grassland habitat. From the park boundary, that dry grassland area is contiguous all the way to Joan MacQueen Middle School (Alpine's emergency evacuation center), and into dense residential areas along Deland Drive and Tavern Road, where hundreds of homes are built on the WUI at the western edge of the park-preserve complex at Wright's Field. What specific actions will be taken to prevent a wildfire from spreading onto the preserved portions of the park site? What specific actions will be taken to prevent a wildfire from spreading onto the adjacent MSCP lands where listed endangered species are found?	Please see the response to comment I21-12. The County will continue to maintain an existing 100-foot buffer adjacent to the northern project boundary and a 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by Alpine FPD. The County would create an additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint. The County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel. Alpine FPD provided a letter regarding fuel clearances, included as Appendix L of the RS-Draft EIR. The project would also comply with San Diego County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3, and Appendix II-A of the Uniform Fire Code. County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (2011). The ordinance requires combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011). The project is also required to comply with the County of San Diego Fire Service Conditions stipulated by the County Fire Services staff (i.e., County Fire Marshall) upon review and approval of the project. Secondly, as part of operations of the project, signs would be clearly posted containing park rules and regulations that would be enforced at the park, in compliance with San Diego County Code of Regulatory Ordinances, Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation.

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I21-14	**Engelmann Oak Avoidance and Minimization Measures** According to UC Cooperative Extension, Engelmann Oak woodlands are diminishing statewide, due to inadequate regeneration of these oaks in their native habitat areas. "Three California oak species (blue oak, valley oak and Engelmann oak) have been repeatedly identified as species that have inadequate regeneration to maintain current stand densities." (*UC ANR, oaks.cnr.berkeley.edu).* Despite this fact, the proposed mitigation and monitoring strategies proposed in the DEIR for the Engelmann Oak woodland at this project location are wholly inadequate to protect this habitat. What monitoring protocol is in place to ensure the health and viability of the Engelmann Oak woodland habitat post-construction, and during ongoing park operation? What measures will be taken to ensure that this portion of the park remains an ecologically functional oak woodland community with associated biodiversity metrics?	An RMP will developed prior to formalizing trails and before opening the open space to the public, in compliance with the County's ongoing commitment to implementing the MSCP. Management and monitoring objectives will be provided in the RMP for the Engelmann oak woodland within the proposed park and for the Engelmann oak woodland stands in the proposed Alpine Park Preserve. No changes to the Draft EIR are needed.
I21-15	Given that no Resource Management Plan (RMP) was appended to this DEIR, it would appear that the avoidance and mitigation measures proposed are currently insufficient to protect this Engelmann Oak woodland as a functional ecological community. Many questions remain unanswered. Specifically - What mitigation measures are in place should any unforeseen activities (such as root system disturbance, tree impacts, etc.) occur during construction and/or operation of the park lead to dead, dying, or diseased oaks within the project area? What condition will the understory of the oak woodland be in - will it be the ecologically rich and biodiverse community that is the hallmark of a mature oak woodland? What monitoring protocols are in place to ensure the currently high levels of biodiversity with the oak woodland? Which native plants will be associated with the remaining oak woodland during the operation of the park?	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will be in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) for further details. No changes to the Draft EIR are needed. There is no requirement that an RMP be prepared before the project is approved. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). Per County Guidelines, oak woodland extents are mapped at the dripline of the individual oak trees. Adjacent upland habitats are predominantly flat-topped buckwheat stands and impacts on these areas will be mitigated in accordance with the habitat-based mitigation requirements presented in the RS-Draft EIR. Language has been added to the Engelmann oak mitigation measure to require monitoring of the health of oaks in proximity to the proposed park and mitigation for any inadvertent/long-

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		term impacts on oak trees resulting from construction of the project. No changes to the Draft EIR are needed.
I21-16	**MM-BIO-5: Protect Pallid Bat** No specific criteria for successful mitigation are defined within the DEIR. What mitigation measures will be implemented to ensure that the impacts to pallid bat are minimized?	Expertly designed bat boxes would be installed prior to vegetation removal. These boxes would be monitored quarterly during the first 2 years and then twice yearly for years 3 through 5 with results documented in an annual report. This will also be included in the RMP.
I21-17	**APM-1: Establishment of the Open Space Preserve** Additional impacts outside of the active park footprint are described as: "activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space preserve as applicable." The DEIR is proposing a significant amount of human activity outside of the active park footprint, some on the order of 3-5 years of active restoration work. What level of activity is being proposed within the Open Space Preserve area? Have the impacts of that additional footprint been assessed? Will the impacts outside of the active park footprint be significant? How significant? How will the cumulative impacts of land management actives outside of the active-park footprint be mitigated?	Management activities associated with the restoration of habitat/host plants for QCB are described in Section 4.4, *Biological Resources*, of the RS-Draft EIR under Threshold #1. Impacts would be less than significant from these restoration activities, as described in the RS-Draft EIR.
I21-18	Why isn't a Draft Resource Management Plan included in the DEIR? Until an RMP is assembled and approved all biological impacts remain significant and unmitigated. How will the potentially significant and ongoing biological impacts to the preserved portions of the County property be mitigated? How will the significant biological impacts to the adjacent MSCP lands be mitigated? Without an RMP in place for biological resource avoidance and mitigation measures, how can the County ensure that the impacts will not be deleterious or unmitigable?	An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will be in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) for further details. No changes to the Draft EIR are needed. There is no requirement that an RMP be prepared before the project is approved. The RMP will be prepared for the Alpine Park Preserve consistent with requirements of the County's MSCP Subarea Plan (County 1997), Framework Management Plan (County 2001), and Sections 10.9A and 10.9B of the Implementing Agreement (County 1998). No changes to the Draft EIR are needed.
I21-19	**Land Use Adjacency Guidelines within the MSCP** It is assumed that recreational trail users will simply traverse the privately-owned trail system within Wright's Field Preserve	Please see MR-2 (Indirect Impacts on Wright's Field) These impacts would be less than significant.

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	to access the Alpine County Park site. Therefore, the impacts of the project on the full park-preserve complex of Wright's Field have to be analyzed and mitigated, not only the impacts to the County-owned property, but to the whole landscape scale ecosystem and recreational network. What environmental impact studies have been conducted on adjacent MSCP designated lands? When were those surveys conducted and which species were surveyed? What avoidance and mitigation measures are being proposed to minimize the impacts of increased active recreation on adjacent MSCP-designated lands?	
I21-20	The overall project design, and public talking points espoused by the County, assume that nearby Alpine residents will use existing private and public road access to trailheads at Wright's Field in order to access the County Park project site. How have the off-site impacts to adjacent MSCP-designated lands been examined and assessed? What are the potential long-term impacts to threatened and endangered species found on adjacent MSCP lands? Impacts to Wright's Field MSCP Preserve have the potential to be significant, and the direct, indirect, and cumulative impacts to BCLT-owned lands at Wright's Field have not been analyzed or mitigated within the DEIR. How will off-site impacts to adjacent MSCP-designated lands be minimized and/or mitigated?	Language regarding potential impacts on special-status species in Wright's Field has been added to the RS-Draft EIR. These impacts would be significant and mitigation is provided in the form of permanent protection of similar habitats on and off site.
I21-21	**<u>Cumulative Impacts</u>** The cumulative impacts of community-wide development plans and simultaneous proposals for development in and around the Greater Alpine area are inadequately described in the DEIR. Only two "present and reasonably foreseeable cumulative projects" are listed and analyzed in the DEIR. However, several large-scale housing developments are proposed for the community of Alpine, including several nearby to the project site that are not included in the DEIR. One example is the new active sports field renovations planned for Joan MacQueen Middle School, less than one mile from the park project location. This project is already well underway, has received some level of funding, and will provide redundant amenities for active sports that are simultaneously being proposed in this park project. Why aren't	The current active sports field renovations at Joan MacQueen Middle School are not associated with the project. Please refer to Chapter 5, *Cumulative Impacts*, of the Draft EIR for information and a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. According to Section 15130(b) of the CEQA Guidelines, cumulative impact analysis may be conducted using the *List Method*, which is "a list of past, present, and probable activities producing related or cumulative impacts." Past projects are defined as those that were recently completed and are now operational. No changes to the Draft EIR are needed.

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	the current active sports field renovations at Joan MacQueen Middle School included in the DEIR for analysis of cumulative impacts?	
I21-22	Another example of inadequate analysis within the DEIR is the Sunset View Estates development, currently being proposed within a mile of the park project location near Eltinge and Marshall Rds. The failure of the DEIR to analyze other, known development proposals currently in progress nearby the project location shows that the impact analysis provided in Chapter 5, Cumulative Impacts is short-sighted and inadequate to the task of assessing the full significance of cumulative impacts to the community of Alpine from several proposed and previously approved developments happening simultaneously within just a few miles of the proposed park project location. Why is the full list of planned and proposed development projects within Alpine not included for analysis within the cumulative impacts section? Why wasn't a full assessment of the adverse effects of several simultaneous development projects and proposals included for consideration in the cumulative impacts section of the DEIR?	This comment is acknowledged. The full list of the planned and proposed projects within Alpine was included in the Draft EIR as provided by the County at the time the NOP was prepared. Two additional projects have been added and are included in the Final EIR. Please see the response to comment I21-21 or Chapter 5, *Cumulative Impacts*, of the Draft EIR for information and a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. No changes to the Draft EIR are needed.
I21-23	In conclusion, given the significant and unmitigable impacts of this proposed project, I encourage the County to adopt Project Alternative 1 (No Project), or Project Alternative 4 (Reduced Project), as the only environmentally responsible alternatives for parkland at this site. Thank you for the opportunity to provide public comment through this process. I sincerely hope that the County staff and supervisors will listen to the concerns of the majority of Alpine residents and scale-down this active parkland proposal at this site while increasing the mitigation and monitoring measures to offset the significant impacts of this project proposal.	The commenter's preference for either the No Project Alternative or Reduced Project Alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I22: Jonah Gula, November 15, 2021

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I22-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report ("DEIR"). I was born and raised in Alpine, and I grew up visiting the proposed park site and adjacent Wright's Field Ecological Preserve ("Wright's Field"). In fact, my experiences and observations of wildlife there greatly influenced my decision to pursue a career as an ecologist. I have spent nearly a decade doing research on a diversity of wildlife across the United States and in two African countries and have published in professional journals about some of that work. Therefore, I believe my scientific background gives me a unique perspective on the DEIR as I am both familiar with relevant scientific literature and how ecological management works. My comments, questions, and responses to them should be made part of the public record for the Project	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I22-2	Unfortunately, the project alternative I would prefer has not been considered despite the input of many community members since fall 2020. The alternative for a small, natured-based park connected to other local parks with off-site amenities that I would prefer was detailed in Julie Simper's NOP letter (pg 159 of the DEIR Appendix) yet was completely neglected in the DEIR. Last fall many people shared this idea with Department of Parks and Recreation ("DPR") staff but to no avail. Now it seems San Diego County and the Alpine Community Planning Group are pursuing a network of trails around Alpine that is not discussed in the DEIR but clearly is a form of piecemealing aspects important to the Project, such as accessibility.	The commenter is referencing the alternative proposed by Preserve Alpine's Heritage and states that alternative is a much smaller, nature-based park that minimizes potential impacts. No changes to the Draft EIR are needed. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project.
I22-3	I am also concerned that points raised in my own NOP letter (pg 213–214 of the DEIR Appendix) were not considered in the biological assessment of the Project and in the DEIR. Most of these have to do with being diligent in the scope of the biological surveys, which should have considered a number of California special status species that are not mentioned once in over 1,000 pages of the DEIR (besides the mention of Western Spadefoot eggs in the Biological Report). The DEIR is overwhelming	The species mentioned in the letter were not analyzed for occurrence because they are not documented within 5 miles of the project site in the CNDDB. Additional analysis has been provided in the RS-Draft EIR for the species mentioned in the letter. See MR-5 (Additional Species Analysis). The BRR has also been updated to include these species in Appendix H, *Special-Status Species Evaluated for Occurrence*, of the BRR.

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	unscientific; that is, it does not consider a breadth of scientific literature and evidence related to the impacts and mitigation of the Project. Instead its authors perform unfounded or circular reasoning that comes through as wholly subjective. Ultimately, the DEIR read as a minimalistic effort despite the abundance of important feedback provided in NOP letters. First, why did biological surveys of the Project site selectively consider special status wildlife species? Why did it not consider the following species, several of which were specifically mentioned in my NOP letter and the letter from David Mayer of California Department of Fish and Wildlife ("CDFW"); those I have personally observed on the site are in **bold**: • Crotch's Bumblebee (listed as globally endangered, S1S2 state rank, and *proposed for listing on the CA Endangered Species Act*) • Western Spadefoot (CA Species of Special Concern, S3 state rank, and *under review for listing on the US Endangered Species Act*) • San Diego Legless Lizard (CA Species of Special Concern and S3 state rank) • Ferruginous Hawk (CA Watch List species, S3S4 state rank, and USFWS Bird of Conservation Concern) • Northern Harrier (CA Species of Special Concern and S3 state rank) • White-tailed Kite (CA Fully Protected species and S3S4 state rank) • Grasshopper Sparrow (CA Species of Special Concern and S3 state rank) • Oregon Vesper Sparrow (CA Species of Special Concern, S3 state rank, USWFS Bird of Conservation Concern, and *under review for listing on the US Endangered Species Act*) • Lawrence's Goldfinch (S4 state rank and USFWS Bird of Conservation Concern) The biological survey only incidentally observed a Red-diamond Rattlesnake (CA Species of Special Concern and S3 state rank)	Western spadefoot has been addressed in the RS-Draft EIR, with discussion of significant impacts and mitigation developed in consultation with USFWS and CDFW. See MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for more information. Southern California (San Diego) legless lizard (*Anniella stebbinsi)* was evaluated for occurrence in BRR Appendix H, *Special-Status Species Evaluated for Occurrence.* The initial determination was that this species is not expected to occur due to lack of suitable sandy soils, but this evaluation has been revised to state that it has a moderate potential to occur. The species has been included in the suite of additional species analyzed in the RS-Draft EIR. The remaining avian species also have been included in BRR Appendix H, *Special-Status Species Evaluated for Occurrence*, and evaluated for impacts in the RS-Draft EIR. Significant impacts on these species would be mitigated in accordance with the mitigation measures included, as revised, in the RS-Draft EIR. The impact analysis for California Species of Special Concern has been refined in the RS-Draft EIR to make it clear that impacts on these species, as listed in the RS-Draft EIR and BRR, would be significant, and to propose mitigation to reduce those impacts to less-than-significant levels.

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	but did not specifically include it in a survey to assess the impact of the Project on the local population. Each of these species has a special status because of habitat loss, which has profound significance in light of the Project and begs the question, why weren't they included in an assessment? Therefore, it is clear comprehensive surveys of different taxa groups are warranted and should be done by an independent party (i.e. not ICF, which did an insufficient job the first time).	
I22-4	I could provide an extensive list of scientific literature on the above species and others that occur on the Project site, but that is not my job. The gross neglect of any literature–besides the CDFW recreation ecology journal issue directly provided in Frank Landis' NOP letter–demonstrates how unscientific the DEIR is. (I should also add that even the scant references to the CDFW journal issue in the DEIR inappropriately interpreted results or did not go on to discuss how the results relate to the Project.) However, I specifically want to reference some selected literature relevant to the Project impacts. I have attached these specific peer-reviewed articles to this letter. Amburgey et al. (2020) demonstrated that the Western Spadefoot was sensitive to habitat patch size in southern California, meaning that decreased patch size negatively affects them. This finding is consistent with a large volume of literature that has shown decreased habitat patch size in already fragmented habitat is related to population extinction risk. Trail maintenance from the Project must also not infill trailside puddles because these small depressions are where Spadefoots breed on the site (personal observation). Table 1 in Ribic et al. (2009) shows a similar relationship between grassland patch area and several of the birds listed above (Northern Harrier, Vesper Sparrow, and Grasshopper Sparrow; Savannah Sparrow and Western Meadowlark are also located on the Project site but not designated a special status). These two examples of literature demonstrate the negative impact that the loss of habitat from the Project will have on special species that were not considered in DPR's biological assessment.	Mitigation for impacts on western spadefoot has been developed in consultation with USFWS and CDFW. See MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details. Loss of habitat for special-status species is provided in further detail in the RS-Draft EIR and mitigation is proposed to reduce significant impacts on special-status species from loss of habitat.

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I22-5	Additionally, the design of any surveys must consider the seasonal and interannual variation in these species. Several only occur during the winter yet from the DEIR Appendix it appears the only winter fieldwork conducted on the Project site was for fairy shrimp. Interannual rainfall varies greatly in San Diego County and this affects breeding of Spadefoots (which is when they are most easily surveyed). Thus, surveys done in a dry year may lead to inappropriate conclusions. Ultimately, surveys must be grounded in reasonable sample sizes and sampling intervals.	Surveys conducted for fairy shrimp in 2018–2019 reflect findings for a very wet rain year. Surveys conducted in 2022 for western spadefoot reflect findings from a dry rain year. Western spadefoot and impacts have been addressed in the RS-Draft EIR, as there would be a new significant impact. See MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4** for additional details.
I22-6	Why does the DEIR frequently discuss impacts to foraging habitat of Cooper's Hawk and Redshouldered Hawk when the loss of so much grassland will actually have a greater impact on the raptors listed above (Ferruginous Hawk, Northern Harrier, White-tailed Kite)?	Additional analysis for these avian species is included in the RS-Draft EIR. Cooper's hawk and red-shouldered hawk were discussed separately because they were observed, whereas the other species are evaluated as potentially occurring.
I22-7	And how will the permanent loss of grassland foraging habitat be mitigated? It is an unmitigable impact.	See MR-3 (Native Grassland Impacts) for a summary of how the loss of native grasslands would be mitigated.
I22-8	And why does pg 6-1 of the Appendix suggest the Project will not prevent wildlife access to foraging or breeding habitat yet elsewhere in the DEIR the impact on and loss of raptor foraging habitat is acknowledged? This is a common kind of inconsistency throughout the DEIR in which the significance of impacts are discussed very briefly and then essentially ignored or downplayed elsewhere.	Page 6-1 of the BRR is addressing the wildlife corridors and connectivity question reflected in Threshold #4 in the RS-Draft EIR and uses a different set of criteria for the analysis, relying on the spatial relationship of the affected areas in relation to adjacent open space. Impacts on specific foraging habitat for special-status species are addressed in Section 4.4, *Biological Resources*, of the RS-Draft EIR under Threshold #1 under a narrower, site-specific analysis of impacts.
I22-9	Why were several species considered as 'potentially occurring' on the Project site yet no specific surveys were conducted for them? It is useless to speculate about potential occurrence of a species like the federally endangered Pacific Pocket Mouse if surveys are not actually going to look for them. Considering the status of the potentially occurring species, I find it highly irresponsible to leave the possibility of occurrence without doing due diligence to confirm presence or not.	Extensive surveys were conducted for special-status plants and many special-status wildlife. Appendix H of the BRR includes a detailed evaluation for special-status plants and wildlife species occurrence, using a variety of literature sources and in-depth knowledge of the site and San Diego County biology. All species with a moderate or high potential to occur on site are addressed in the RS-Draft EIR. Species that do not occur in the vicinity, lack habitat on the project site, or have been determined to be absent from the project site as a result of survey work are not evaluated.
I22-10	On pg 1-4 of the Appendix it is stated that during the course of vegetation mapping, biologists 'assessed the need for any	The team surveying the site from 2018 through 2022 included experienced biologists, many of whom have spent over 20 years

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	additional protocol wildlife surveys to be conducted.' Why was such a subjective approach taken? Did these biologists have sufficient knowledge of the Project site to make such subjective decisions? This methodology is antithetical to a scientific environmental assessment, and likely explains the lack of consideration of the species I listed above. And this is in spite of my NOP comments expressly mentioning some of those species. After all, how can you know if a species occurs there without having done surveys for them?	of their professional careers in the biological field in San Diego and Southern California. The biologists who performed the vegetation mapping also possess multiple federal Section 10(a)1(a) Recovery Permits for the wildlife species they were assessing for their potential to occur on site. By virtue of issuing the appropriate Recovery Permits to these individuals for these wildlife species, USFWS has determined they are qualified both to assess the potential for specific species to occur and to conduct the surveys. Additional species analysis has been provided for a number of non-listed special-status wildlife species in the RS-Draft EIR.
I22-11	Why did DPR limit its search for records of plants and animals to the agency databases listed on pg 1-2 of the Appendix? Citizen science databases are widely available and their utility in research is widely acknowledged in scientific literature. In fact, I myself have used databases such as eBird and iNaturalist in my own research to fill significant knowledge gaps about species distribution. The neglect of these valuable sources of information is inappropriate because it limits detectability of species to sporadic surveys done by agencies over random timespans.	The standard protocol for CEQA analyses is to use agency databases such as the CNDDB and the Carlsbad USFWS office GIS data, because these data are collected by biologists who have more robust qualifications to make correct identifications. Citizen scientist databases are often unverified and erroneous. Additional species analysis has been provided for a number of non-listed special-status wildlife species in the RS-Draft EIR.
I22-12	Also, even in the sources used, were species like the Western Spadefoot not recorded on the Project site? I find it difficult to believe there were not records of them in the databases. For transparency sake for an ecologist like me, I request the raw data located in these databases to be included in some way publicly.	The list of species initially included in Appendix H of the BRR was generated from a search of the CNDDB records within 5 miles. The CNDDB data are available through CDFW's website "BIOS." The CNPS Rare Plant Inventory, which also was queried to generate a list of special-status plants, is also available online. Western spadefoot was inadvertently omitted from the list of species initially evaluated in the Draft EIR but has been included in the RS-Draft EIR.
I22-13	On pg 4.4-15 it is stated that special status wildlife species will be assessed for impacts from implementation of the Project. How will they be assessed? This seems like a deferral of analysis and mitigation. It needs to be explicitly explained how impacts to them will be monitored, especially given that the raptors and reptiles mentioned were not even surveyed in a systematic way so as to actually measure post-construction impacts.	The species included in the lists on the two pages referenced were included for analysis within the RS-Draft EIR and mitigation measures were written with those species in mind. Language has been changed in the RS-Draft EIR to make this clearer.

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I22-14	Why does the DEIR describe the high conservation value of the valley needlegrass grassland community under the Project footprint and its uniqueness in the area yet not address that the Project will permanently destroy over half of the needlegrass area on the property? This is an unmitigable impact that is glossed over. In the County's Multiple Species Conservation Program it is acknowledged that any loss of native grassland will impact function and viability of the habitat. The DEIR focuses much on the scrub habitat that will be conserved on the property when really the predominant issue is the loss of the grassland. How is the Project justified as is considering the level of threat to this grassland community?	See MR-3 (Native Grassland Impacts) for a summary of how the loss of native grasslands would be mitigated.
I22-15	Why does the DEIR conflate protection of individual Engelmann oaks to conservation of an Engelmann oak woodland community? This is ecologically incomprehensible. The development that will take place around the individual oak trees will by definition destroy the community, which includes the grassland around it. Mitigation that involves not cutting down individual trees while still building around and among them does not actually address the ecological impact that is the issue. Consequently, the DEIR does not actually provide a reasonable assessment and mitigation for the impacts on the Engelmann oaks on site. Additionally, the high human (and horse) activity around the oaks will likely render them useless for bird nesting, which is an example of the community-level impact to which I refer. Such an impact is not addressed in the DEIR.	Impacts on Engelmann oak woodlands are discussed, potentially significant impacts on Engelmann oak woodlands are disclosed, and mitigation is provided in the Draft EIR.
I22-16	Why does the DEIR continually acknowledge (some of) the impacts of the Project but primarily provide mitigation measures that address impacts during the construction process?	Mitigation is focused on impacts during construction because that is when the initial disturbance would occur. An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will be prepared in compliance with the CDFW scoping letter, which requests an RMP be prepared prior to opening trails to the public. See MR-4 (Natural Resource Mitigation) for further details. No changes to the Draft EIR are needed.
I22-17	And why does the DEIR acknowledge in multiple places (e.g. pg 2-7) the impact from (significantly) increased visitation but not	Page 3-5 of the Draft EIR states, "Operation of the project would be expected to serve community residents and visitors, with an

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	mitigate that in any meaningful way. The anticipated average daily use of the park by 500 people (pg 3-5) has not been reasonably factored into any analysis of impact on biological resources. This volume of visitation is significantly higher than what the site receives now and will undoubtedly have direct and indirect impacts that are mostly glossed over in the DEIR. One example of this is on pg 4.4-20 to 4.4-21: the impact of increased use of an area on butterflies (referencing Quino checkerspot) is acknowledged but is illogically argued that current trail use has not prevented the Quino checkerspot from persisting on the site. The current trail use cannot be equated to that anticipated during operation of the park, so it renders the weak assessment of increased visitation useless as is. Then on pg 4.4-20 it is stated "there is a possibility for increased foot traffic, mountain bike traffic, and horse traffic…" This is highly misleading and, frankly, deceptive language because the DEIR already stated the anticipated average of 500 people using the park daily; also, increased visitation (by magnitudes of what it is now) is the purpose of the park.	anticipated average daily use of 500 people..." This number reflects all users of the park, with most of them expected within the footprint of the active use park and not within the existing trails that currently traverse the County's parcel. It is not anticipated that the presence of an active use park would dramatically increase trail usage over baseline conditions. Rather, the availability of regional open space recreational opportunities as well as larger demographic and social trends are expected to drive users of the passive trail system on the County's parcel more. As such, the analysis presented in the Draft EIR is adequate and no further edits are required.
I22-18	Why has the DEIR entirely neglected the inevitable impacts on adjacent Wright's Field? David Mayer (CDFW) specifically requested an assessment of how DPR will manage permanent indirect impacts but this was done very poorly. Scientific literature, including articles in the CDFW recreation ecology journal issue, exists demonstrating that even undeveloped open space preserves with public access may have reduced capacity to conserve some populations of reptiles and small mammals. The anticipated volume of visitors to the proposed park will have bleed-over effects on Wright's Field, including but not limited to: litter, erosion, vandalism (already regular on boulders at Wright's Field), negative impacts on biological resources, and habitat degradation. The DEIR acknowledges some of these impacts but limits its scarce discussions of them to the Project site only. The DEIR must include how the Project will impact Wright's Field as an ecological preserve (i.e., the same factors considered for the Project site itself). On pg 3-5 of the Appendix it states the indirect impacts on sensitive species are unlikely to	See MR-2 (Indirect Impacts on Wright's Field).

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	be harmful, citing no nocturnal lighting or formal trails as reasons. However, such indirect impacts (like on Wright's Field) have not been meaningfully assessed, if discussed at all. So the language there is dishonest and inconsistent with the recognized impacts of the Project.	
I22-19	Why does the DEIR take a mammal-centric view of habitat connectivity by assuming that connectivity is only related to movement on the ground (e.g. via drainages, ridgelines, etc.)? Birds do not need drainages to move across a fragmented landscape–they need stepping stones of habitat. Isolated habitat islands like the Project site are critical as stepping stones for grassland dependent birds (including Burrowing Owls and others listed above) in a region where grasslands have been greatly reduced in size and abundance. Bolger (2002) demonstrated that increased fragmentation causes local extinctions and limits dispersal of birds. Reducing the size of an available habitat patch like the Project site not only has implications for the birds that already exist there but it has an impact on population recovery of many species in the region, such as the Burrowing Owl. Just because the Burrowing Owl does not currently occur on the site as a breeding species does not mean it cannot in the future. Reducing the size of the habitat patch on the Project site might actually preclude that from happening. The same goes for other species with reduced populations in San Diego County. Indeed, grassland birds are more abundant in larger habitat patches (Rao et al. 2008) and decreasing the size of such habitat patches will reduce the capacity for regionally sensitive species to recover.	The RS-Draft EIR provides additional details on how the project could affect wildlife connectivity and corridors. Additional significant impacts on wildlife movement are not anticipated.
I22-20	How does DPR intend to enforce dog leash rules? I find it highly unlikely a volunteer park attendant will be able to reasonably enforce the requirement for dogs to be on a leash. Already the site and adjacent Wright's Field experience a high volume of dogs and despite the rule for leashes, it is ignored, even when people like myself request others to leash their dogs. This is one of the most unenforced rules at any park and disregard for this rule is pervasive. On pg 4.4-21 the empirical evidence of the effect of even leashed dogs on birds is acknowledged but the	The project would recruit a live-on volunteer, maintenance workers, and park rangers that would have regular patrols throughout the park. The dog park is located away from Wright's Field, along South Grade Road. Park signage would include dog leash rules and be posted throughout the park. This would involve a much higher degree of oversight within the property compared to current baseline conditions, in addition to park rangers. No changes to the Draft EIR are needed.

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	DEIR fails to address this in any impact assessment of mitigation strategy. The intention of having a dog park as part of the Project will obviously lead to increased numbers of dogs on the site and must consider this from a social (leash rules protecting other visitors from strange dogs) and a biological perspective. This is also probably the most inappropriate location in all of Alpine to have a dog park given the ecological impacts of increased dog use.	
I22-21	What will DPR do in the future if water requirements cannot be met, as indicated in the shortsighted assessment of water availability and use on pg 4.19-17 to 4.19-18? This Project will require significant water use despite water shortages in the state and county and the regular drought state of emergencies that California governors have issued in recent years. The amount of water to be used on the Project site is not in alignment with the site's character, which is naturally a dry habitat. Additionally, the idea that water removed from a reservoir for use at the park in times of drought is irresponsible because this could have implications for residents in the county. Why was the increased moisture availability on the Project site not considered? Water availability is uncharacteristic of the site and an increase may promote the increase of invasive Argentine ants (Menke and Holway 2006). Also, the water study mentioned on pg 4.19-4 needs to actually happen and not just be a thought experiment. The statement about a study being required in the future is an inappropriate deferral of analysis.	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR. No changes to the Draft EIR are needed.
I22-22	Why does the DEIR's geological section focus so much on paleontology without considering the unique geological features of the site? The Project will directly impact the unique geology of the mesa and may be in violation of CEQA Appendix G guideline 6, which specifically addresses impacts to such a unique site. The failure of the DEIR to mention the site's unique geology represents a significant neglect.	The County of San Diego has a list of Unique Geologic Features and a list of Potentially Unique Geologic Features. This site is not currently included in those lists. Please refer to MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.
I22-23	On pg 4.16-2, why are parks owned by other entities or without a joint exercise of powers agreement with the County not included? By excluding these parks in Alpine and the surrounding area, it skews the statistics in a dishonest way that	See MR-12 (Parks Master Plan) for more information regarding park needs. No changes to the Draft EIR are needed.

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	makes it seem as though there are next to no parks for Alpiners. As someone who grew up in Alpine, I can honestly say there was never a shortage of parks for various activities.	
I22-24	The mitigation measures related to nocturnal lighting are not consistent: outdoor lighting will be turned off except some for safety. So actually outdoor lighting will not be turned off? This language seems like a bait and switch. Where will the safety lighting be located and how much of it will there be? Also, why did the DEIR not consider the impact of nocturnal lighting on insects? Scientific evidence is mounting regarding the negative impact of artificial lighting on insect populations, which are declining due to light-related mortality in many areas (Owens et al. 2020, Boyes et al. 2021).	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I22-25	Why were a number of topics requested by David Mayer (CDFW) in his NOP letter wholly unaddressed? For example, he requested a range of alternative locations for the Project but this cannot be found in the DEIR. This is especially significant given the County Parks Master Plan identified 70 vacant parcels that "may be suitable for park development if purchased. As I mentioned above, he asked DPR to consider seasonal variation in the ecology of the project site yet the only surveys that were done in winter were for fairy shrimp.	See MR-12 (Parks Master Plan) for a discussion of County DPR's actions related to alternative locations for the project. No changes to the Draft EIR are needed.
I22-26	He addressed the *need* for a complete discussion of the purpose and need for the Project, specifically amenities like an equestrian area. This is nowhere in the DEIR.	See MR-12 (Parks Master Plan) for further information related to park needs. No changes to the Draft EIR are needed.
I22-27	Finally, here are a number of other unaddressed questions I have. How will DPR ensure the park is not used for organized sports, as explicitly stated by DPR staff and in the DEIR?	The project would recruit a live-on volunteer, maintenance workers, and park rangers that would have regular patrols throughout the park and a much higher degree of oversight within the property compared to current baseline conditions. Additionally, rangers would be onsite during hours of operation. No changes to the Draft EIR are needed.
I22-28	How will horse traffic impact wildlife and habitat degradation, especially with manure on trails?	Existing multi-use trails are previously disturbed. As discussed in Section 4.4, *Biological Resources*, of the RS-Draft EIR, a Manure Management Plan would be prepared to control disease vectors and pests, such as mosquitoes and other animals/insects that are vectors for disease or impacts on human health.

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I22-29	How does DPR justify planting so many trees (regardless of if they are native) as aesthetics mitigation on a site that is naturally marked by its lack of trees? Are these trees factored into the water requirements of the Project?	Tree planting is part of the site design, which will continue to be developed as the project moves forward. The Alpine community will be consulted on site features, including landscaping, during this process. No changes to the Draft EIR are needed.
I22-30	How will DPR prevent mountain bike users from creating unauthorized trails, both on the Project site and adjacent Wright's Field? This is a pervasive issue in the County and must be considered, especially considering its impacts on the neighboring ecological preserve.	It would be the responsibility of the onsite ranger and support staff to maintain the site in the manner prescribed by the design, associated regulations, and user decorum. Signage specific to this issue can be incorporated into the project specifications. No changes to the Draft EIR are needed.
I22-31	Is not the Project inconsistent with the Alpine Community Plan elements 6, 9, and 10? Referring to the goals of these specific elements in the plan is self-explanatory.	The EIR plan is not inconsistent with the elements of the Alpine Community Plan (Noise, Conservation, Open Space). No changes to the Draft EIR are needed.
I22-32	Why will the park be open from sunrise to sunset yet quiet hours do not begin until 10:00 pm?	"Quiet hours" are the hours between 10:00 p.m. and 7:00 a.m. in residential areas. Sunset is the time identified for park closing, as that time period coincides with the shutting down of onsite area lighting, which would close the park to daily usage. No changes to the Draft EIR are needed.
I22-33	Why are residents adjacent to the Project site not considered a principal viewing group in the visual assessment? They are the ones who will be primary impacted.	Residents adjacent to the project site are considered part of a principal viewing group; several views shown in Draft EIR Section 4.1, *Aesthetics and Visual Resources*, represent those viewers. No changes to the Draft EIR are needed.
I22-34	The Executive Summary of the DEIR mentions potential overflow parking onto South Grade Road. Does DPR anticipate filling more than 250 parking spots? If so, how will overflow parking onto nearby residential streets be managed?	Parking spaces will not exceed 240 spaces. The number of parking spots provided is based on current park design guidelines and parking requirements; however, from a day-to-day operations standpoint, it is unlikely that the parking lot would be fully occupied. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed.

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		Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access.
I22-35	How does DPR justify the impacts of this project in light of the past proposed development on this site was considered unmitigable? I referenced the need to consider findings in the Stagecoach Ranch development DEIR in my NOP letter but nowhere is this history mentioned in this DEIR. Similarly, when a high school was proposed on the site it was determined the biological impacts could not be mitigated. So what makes them mitigable now?	This comment compares this EIR to other projects and does not identify specific significant environmental impacts. No further response is required. No changes to the Draft EIR are needed.
I22-36	I also make the following recommendation: • Given the uniqueness and sensitivity of the habitat and the species occurring there, DPR should design pre- and post-construction biological surveys that allow for proper scientific assessment of Project impacts after construction. This is not only relevant for the Project at hand but also future projects. Such exemplary research are lacking from DPR's project plans and considerations.	Biological surveys would be conducted pursuant to the mitigation measures outlined in RS-Draft EIR Section 4.4, *Biological Resources*, and as prescribed by the resource agencies having jurisdiction over the project. Such surveys would address pre-construction conditions, construction period restrictions, and post-construction protective actions.
I22-37	I thank you for the opportunity to provide this meaningful input as it addresses significant holes in the DEIR and Project plan. I would like to receive all notices relating to this project at Jonah.gula@yahoo.com	The County appreciates the comments submitted on the Draft EIR. These comments and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No further response is required. No changes to the Draft EIR are needed.
I22-38	The influence of species life history and distribution characteristics on species responses to habitat fragmentation in an urban landscape (Page 8 to Page 20)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
I22-39	AREA SENSITIVITY IN NORTH AMERICAN GRASSLAND BIRDS: PATTERNS AND PROCESSES (Page 21 to Page 32)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
I22-40	HABITAT FRAGMENTATION EFFECTS ON BIRDS IN SOUTHERN CALIFORNIA: CONTRAST TO THE "TOP-DOWN" PARADIGM (Page 33 to Page 49)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
I22-41	A Landscape Analysis of Grassland Birds in a Valley Grassland-Oak Woodland Mosaic1 (Page 50 to Page 62)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.

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I22-42	biotic factors control invasion by Argentine ants at the community scale (Page 62 to Page 71)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
I22-43	Light pollution is a driver of insect declines (Page 72 to Page 80)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.
I22-44	Is light pollution driving moth population declines? A review of causal mechanisms across the life cycle (Page 81 to Page 101)	This attachment is acknowledged. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I23: Mary Harris 1, October 15, 2021

Comment#	Comment Text	Response
I23-1	Please call me: 619 *** **** Mary Harris Alpine Community Planning Group	The County appreciates the comments submitted on the Draft EIR. This comment and the included contact information will be shared with the County of San Diego Board of Supervisors and the project team. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I24: Mary Harris 2, October 21, 2021

Comment#	Comment Text	Response
I24-1	Please tell me exactly what kind of park the new Alpine Park will be. I need an answer to those calling the our new park a Sports Complex.	The County appreciates the comments submitted on the Draft EIR. This comment will be shared with the County of San Diego Board of Supervisors. The uses intended for the park are described in the Draft EIR Section 3.3, *Air Quality*; Subsections 3.3.1, 3.3.2 and 3.3.3. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I25: Mary Harris 3, October 22, 2021

Comment#	Comment Text	Response
I25-1	I appreciate the time you spent listening to my concerns.	The County appreciates the comment submitted on the Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required and no changes to the Draft EIR are needed.

Comment Letter I26: Summer Herrin, October 15, 2021

Comment#	Comment Text	Response
I26-1	Thank you for the information. I am looking forward to this new park and I hope it is built while my 3 year old is young enough to use it!! Alpine definitely needs a park with updated playground equipment (and most importantly, bathrooms!!). The concerns I have about the park are the parking lot and sports fields. The parking area seems really large for our community and will take up alot of space that could be maintained in its natural state. As for the sports fields, Alpine already has so many baseball fields, we do not need more!!!! By my count we have at least 4. Shadow Hills has 3 or more baseball fields and the one behind the library. Creekside has an open field that I believe is also used for baseball and soccer. Wrights field seems like it should be more of an outdoor nature and recreation area. WE DO NOT NEED or WANT MORE BASEBALL FIELDS. I do think a pickle ball field would be a great addition to wrights field because we don't have any other pickle ball fields in Alpine.	The County appreciates the comment submitted on the Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's general support for the project is noted for the record. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required and no changes to the Draft EIR are needed.

Comment Letter I27: Mary Hicks, November 15, 2021

Comment#	Comment Text	Response
I27-1	Approval of a sports complex dominating Wright's Field borders on CRIMINAL because of the many issues not addressed or mitigated: Destruction of biological resources, wildfire danger, road safety (daily and during wildfire) Wildfires: Land is classified as a very high fire hazard severity zone, and the project:	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's opposition to the project is noted for the record. This is an introductory comment that precedes specific comments. Please refer to MR-1 (Western Spadefoot Recirculation), MR-2 (Indirect Impacts on Wrights Field), MR-3 (Native Grassland Impacts), MR-4 (Natural Resource Mitigation), MR-5 (Additional Species Analysis), MR-6 (Wildlife Corridors), MR-7 (Transportation and Safety), and MR-9 (Wildfire). No further response is required. No changes to the Draft EIR are needed.
I27-2	a) Substantially impairs the emergency response plan or emergency evacuation plan of the area;	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K.
I27-3	a) Substantially impairs the emergency response plan or emergency evacuation plan of the area;	Please see the response to comment I27-2. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K.
I27-4	c) Putting a sports complex in a rural area with unimproved lowest-Level Roads endangers residents and exacerbates wildfire risks. Road –no upgrades – no sidewalks no turn lanes, currently dangerous – site of accidents and deaths.	Regarding pedestrian and road safety, please see MR-7 (Transportation and Safety). The trip generation utilized for the project is based on the appropriate trip generation rate for a local community park, which would reduce VMT in the project area compared to existing conditions Regarding wildfire risks, please see MR-9 (Wildfire).
I27-5	d) Lack of infrastructure proposed that exacerbates fire danger and results in ongoing impacts to the environment. Road unimproved, nor is improvement proposed.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the Draft EIR are needed.
I27-6	Aesthetics: DESTROYS scenic vistas - The project conflict with applicable zoning and other regulations governing scenic quality.	As shown on the "before-and-after" visual simulations provided in Draft EIR Section 4.1, *Aesthetics and Visual Resources*, with the exception of additional conforming vegetation, views of the

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	a) Proposal has substantial adverse effects on a scenic vista. Proposed mega-Sports Complex Completely DESTROYS views from South Grade.	project site from the surrounding vicinity would not be substantially changed. No changes to the Draft EIR are needed.
I27-7	c) Wright's Field is a non-urbanized area of Alpine, widely used 24/7 as a passive natural park. Proposed sport complex substantially degrades the existing visual character or quality of public views of the site and its surroundings, seen from public views experienced from publicly accessible vantage point	Please see the response to comment I27-6, above.
I27-8	d) Proposed regional Sports Complex creates a new source of substantial light or glare that adversely affects day and nighttime views in the area.4.16	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I27-9	Not yet considered: 1. a significantly smaller park consistent with ALL Alpine County Park polling data. 2. Joint use maintenance agreements for Alpine's FIFTEEN other publicly owned playing fields. 3. Distribute amenities to SAFE locations closer to kids and families.	This comment referring to a reduced scope alternative is noted for the record. Please refer to Chapter 6, *Alternatives*, of the Draft EIR and MR-10 (Passive Park Alternative), which detail additional project alternatives. Please also see MR-12 (Parks Master Plan) for details related to Joint Use Agreements. No changes to the Draft EIR are needed.
I27-10	TOO BIG – 300 parking spaces – bigger than the largest commercial parking lot in Alpine (Albertson's) Road –no upgrades – no sidewalks no turn lanes, currently dangerous – site of accidents and deaths	Parking spaces will not exceed 240 spaces. The number of parking spots provided is based on current park design guidelines and parking requirements; however, from a day-to-day operations standpoint, it is unlikely that the parking lot would be fully occupied. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access.
I27-11	Water	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems,* and MR-15 (Water and Wastewater). The past and current usage of Wright's Field is referenced in Draft EIR Sections 4.2, 4.4, and 4.16. No changes to the Draft EIR are needed.
I28-12	Wright's Field currently and for many years has been utilized by the Alpine community on a 24/7 basis as a passive wildlands open park.	This comment regarding Wright's Field is acknowledged. The project would be implementing a park and open space on the current County land adjacent to Wright's Field to provide contiguous open space land. The active park is not part of the open space, as the Habitat Conservation Plan would cover the

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		open space acreage. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Refer to MR-2 (Indirect Impacts on Wright's Field). No changes to the Draft EIR are needed.
I27-13	I do not support the proposed 25-acre county park which comprises a skate park, bike park, multiple soccer field areas, baseball/softball field, basketball court, pickleball courts, 244 parking spots, and much more, at the location adjacent to Wright's Field Preserve. Not only does this not align with the initial 12-15-acre community park concept, it does not respect the area's rural and natural heritage; an important part of what makes Alpine so special. Once gone, it's gone forever.	The commenter's opposition to the project is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I27-14	Further concerns include 4.) **Biological resources negatively impacted**: environmental and fiscal impact on surrounding nature/land (namely Wright's Field Preserve) • Proposed mega-Sports Complex contravenes existing State guidelines and law. • will have a substantial adverse effect, both directly and through habitat modifications, on [multiple] species identified as a candidate, sensitive, or special status species designated by local or regional plans, policies, or regulations, and by the California Department of Fish and Game or U.S. Fish and Wildlife Service. • This site has one confirmed endangered butterfly and previously hosted a second endangered butterfly, is thick with owls, bobcats and a host of prey species to support them • The currently proposed sports complex will deeply impact Wright's Field as a nature preserve. The field can sustain facilities and programs for hiking, walking, dogs, bikes and horses, but aggressive development of the field's unique native grassland and Engelmann Oak habitats is a dagger to both the field and the surrounding areas as we know it.	The commenter's opposition to the project is noted for the record. Significant impacts on biological resources, including QCB, were updated and are included the RS-Draft EIR. **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** provides the details needed to support the conclusion that mitigation will be adequately provided to address impacts on QCB. Hermes copper butterfly is not present within the Biological Survey Area.

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I27-15	**Aesthetics: DESTROYS scenic vistas** – The project conflict with applicable zoning and other regulations governing scenic quality. • Proposal has substantial adverse effects on a scenic vista. Proposed mega-Sports Complex Completely DESTROYS views from South Grade. • Wright's Field is a non-urbanized area of Alpine, widely used 24/7 as a passive natural park. Proposed sport complex substantially degrades the existing visual character or quality of public views of the site and its surroundings, seen from public views experienced from publicly accessible vantage point	As stated in Draft EIR Section 4.1, *Aesthetics and Visual Resources*, the project has been determined to not have a significant impact on scenic vistas. Also, as shown on the "before-and-after" visual simulations provided in Draft EIR Section 4.1, with the exception of additional conforming vegetation, views of the project site from the surrounding vicinity would not be substantially changed. No changes to the Draft EIR are needed.
I27-16	**Mega Sports Complex Conflicts with local policies** or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **Mega Sports Complex Conflicts** with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **Mega Sports Complex will have a substantial adverse effect** on riparian habitat sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. **Mega Sports Complex will have a substantial adverse effect** on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. **Mega Sports Complex** Conflict with local policies and ordinances protecting biological resources. **Mega Sports Complex Conflicts** with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan and other approved local, regional, or state habitat conservation plan	The suggested project conflicts with local policies, established habitat conservation plans, and biological resources are not supported by information contained in Section 4.4, *Biological Resources*, of the RS-Draft EIR. Similarly, the suggested substantial adverse effects associated with biological habitats, sensitive natural communities, or wetlands are not concluded in the Draft EIR, taking into account proposed mitigation.
I27-17	**2) Wildfire**	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other

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	Land is classified as a very high fire hazard severity zone, and the project: a) Substantially impairs the emergency response plan or emergency evacuation plan of the area; b) Exposes project neighbors to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to concentration of people in an area that cannot safely evacuate. c) Putting a sports complex in a rural area with unimproved lowest-Level Roads endangers residents and exacerbates wildfire risks. Road –no upgrades – no sidewalks no turn lanes, currently dangerous – site of accidents and deaths d) Lack of infrastructure proposed that exacerbates fire danger and results in ongoing impacts to the environment. Road unimproved, nor is improvement proposed. **Mega Sports Complex** IS located in state responsibility areas / lands classified as very high fire hazard severity zones, and the project: a) Substantially impairs an adopted emergency response plan or emergency evacuation plan; b) Due to slope, prevailing winds, and other factors, exacerbates wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. c) **Mega Sports Complex proposal cannot provide** the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk, resulting in temporary or ongoing impacts to the environment, because of the physical limitations of the site and existing private property and roads.	sufficient controls that would be in place to reduce wildfire risks. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. Please also refer to Section 4.20, *Wildfire*, Section 4.9, *Hazards and Hazardous Materials*, and the FEOA in Appendix J of the RS-Draft EIR for information concerning site-specific wildfire and ignition risks associated with the project site as well as project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations. Sufficient controls would be in place that would adequately address and manage wildfire risks.
I27-18	2) **Transportation and traffic issues** inadequately addressed: It's far from the inhabited town center, lack of safe pedestrian/bike access (kids would have to cross Wright's Field Preserve or go along the roadside), dangerous automobile access on South Grade Road, traffic.	The project would construct a local park and open space adjacent to Wright's Field. Parking spaces will not exceed 240 spaces. The number of parking spots provided is based on current park design guidelines and parking requirements; however, from a day-to-day operations standpoint, it is unlikely

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	Road –no upgrades – no sidewalks no turn lanes, currently dangerous – site of accidents and deaths TOO BIG – 300 parking spaces – bigger than the largest commercial parking lot in Alpine (Albertson's) **Mega Sports Complex** is inadequate in addressing transit, roadway, bicycle and pedestrian facilities transit, roadway, bicycle and pedestrian facilities **Mega Sports Complex Conflicts** Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) and incompatible uses **Mega Sports Complex** Results in inadequate emergency access	that the parking lot would be fully occupied. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I27-19	**3) Noise/light pollution** – proposed park contravenes existing guidelines and law: Noise- project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Proposed regional Sports Complex creates a new source of substantial light or glare that adversely affects day and nighttime views in the area.	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed.
I27-20	**4) safety/security** maintenance (existing recreational facilities in Alpine are not properly maintained), etc.	Please refer to Section 4.15, *Public Services*, of the Draft EIR for information regarding standard police protection services that would be provided. The project would include a live-on volunteer, a park ranger, and maintenance staff to enforce rules and maintain the Alpine Park and open space. No changes to the Draft EIR are needed.
I27-21	**5) Transportation and traffic –** **Mega Sports Complex** is inadequate in addressing transit, roadway, bicycle and pedestrian facilities transit, roadway, bicycle and pedestrian facilities **Mega Sports Complex Conflicts** Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) and incompatible uses **Mega Sports Complex** Results in inadequate emergency access	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Please also see MR-9 (Wildfire) for additional information on emergency response and evacuation.

Comment#	Comment Text	Response
I27-22	**6) Utilities/service systems** **Mega Sports Complex** Requires the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? **Mega Sports Complex does not have** sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **Mega Sports Complex** does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments for wastewater.	Please see the response to comment O8-76. Please also refer to MR-15 (Water and Wastewater). Adequate facilities and capacities are deemed to be available with regard to water, wastewater treatment, stormwater drainage, and other utilities needed for operation of the project. Please see Draft EIR Sections 4.6, *Energy*, 4.10, *Hydrology and Water Quality*, 4.15, *Public Services*, and 4.19, *Utilities and Service Systems*, for further information on these topics. No changes to the Draft EIR are needed.
I27-23	Loss of habitat, fire safety, and transportation remain unresolved issues.	The Draft EIR concludes that these topics would not be subject to significant impacts. Please see Sections 4.4, *Biological Resources*, and 4.20, *Wildfire*, of the RS-Draft EIR and Sections 4.15, *Public Services*, and 4.17, *Transportation and Circulation*, of the Draft EIR for further information.

Comment Letter I28: Don Hohimer, November 15, 2021

Comment#	Comment Text	Response
I28-1	For 25 years I've chosen to live in Alpine and have considered myself fortunate to hike and ride in the beautiful public open space that we call Wright's Field. As a former teacher and administrator at the adjacent Joan Mac Queen Middle School, I introduced a generation of children to the preserve's biological and cultural heritage as an outdoor laboratory. As past president of Back Country Land Trust, I've worked with countless scientists to document the rare species found throughout the preserve. The human cultural history over the past 100 years has been well documented from Kumeyaay village, homesteaders, ranching, and Wright family. If you know where to look, artifacts are easily found throughout the preserve today. To honor the past, BCLT briefly considered renaming the preserve Mesa del Arroz as it was named during the California	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This is an introductory comment about Mr. Hohimer's background, connection to BCLT, and knowledge of Wright's Field and its history that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.

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	Rancho era, but to locals it has always been called Wright's Field. Despite possessing rare and endangered habitats, and clay soils that do not percolate, attempts to exploit the land have been frequent: golf courses, sewage treatment plants, luxury homes, Alpine High School, and now a sprawling sports complex. Local experts like myself have regularly been called upon to provide factual evidence to prove what San Diego County staff determined many years ago: Wright's Field's best and highest use is as a passive or natural park. When County Parks acquired the remainder parcel last year, many of us were relieved that acquisition of the entire grassland complex would finally be completed. In a classic bait and switch, we learned 26 acres of native grassland would be destroyed to create a redundant sports complex.	
I28-2	Unless the park is designed to be carbon neutral and sustainable now, it will require future carbon emissions for maintenance and upkeep. This conflicts with County climate action plans.	Please refer to MR-8 (Greenhouse Gases and Energy). As discussed in Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR, the project would be consistent with the goals of the 2017 Scoping Plan, which would make sure that the State reaches its GHG reduction goals. No changes to the Draft EIR are needed.
I28-3	The current park design is not sustainable for water use or wastewater management. The planned seven (7) acres of natural turf grass and over 300 new trees and shrubs will require a significant input of water. Estimates indicate that this park will use 10-15 million gallons of potable water per year with an estimated cost of $130,000 annually for irrigation alone.	Please see the response to comment O8-76. Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR for information regarding the project's water demands as well as MR-15 (Water and Wastewater). The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to reduce water demands for irrigation. Additionally, prior to the issuance of building permits, a water supply assessment would be required to conclude that PDMWD would be able to provide adequate water supplies for operation of the proposed park during the life of the park. No changes to the Draft EIR are needed.
I28-4	Clay soil across the site provides insufficient drainage. The septic system planned for the site is situated in a headwaters tributary of Alpine Creek with runoff draining into El Capitan Reservoir. Wastewater infiltration basins on the site will be atop clay	Please refer to Section 4.7, *Geology and Soils*, of the Draft EIR for information regarding the soil setting and capability of the soil to support septic systems. The project is proposing two options for sewage disposal: (1) connecting to the existing public sewer line within Tavern Road or the existing sewer line within the

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	substrate and will not likely drain sufficiently, causing a vector issue for mosquitoes and algae.	northern portion of South Grade Road, or (2) installing an onsite septic system with a filter treatment system and treatment leach field. The County Department of Environmental Health and Quality is authorized by the Regional Water Quality Control Board to issue permits for onsite wastewater treatment systems. The Department of Environmental Health and Quality would review the onsite wastewater treatment systems layout for the project pursuant to its Land and Water Quality Division's On-site Wastewater Systems: Permitting Process and Design Criteria. Therefore, the project site would be evaluated by the authorized, local public agency for a determination of the suitability of onsite soils for the proposed septic system. No changes to the Draft EIR are needed.
I28-5	DPR's own Water Conservation Plan, adopted in 2010, does not support the intensive water usage proposed, and proposed wastewater management is insufficient.	The project would implement water conservation measures such as low-flow toilets and sinks and include drought-resistant landscaping. The project would also comply with the County of San Diego Water Efficient Landscape Design Manual, which establishes a structure for planning, designing, installing, maintaining, and managing water-efficient landscapes in new construction and projects with modified landscapes. Please see the response to comment I28-4 for additional information on the project's wastewater management. No changes to the Draft EIR are needed.
I28-6	From 1999-2001 I personally witnessed the massive grading project struggling to create flat spaces for Joan Mac Queen Middle School. Two years of work uncovered massive SUV sized boulders, and unworkable muck during the rainy seasons, leading to an extra year of delays. Fields, landscapes, and native plant mitigation were multi-year failures due to the dense clay soils. ***How can the County fail to learn from earlier site selection mistakes and propose grading on an even larger scale for a redundant sports park?***	Please refer to Section 4.7, *Geology and Soils*, and the Geotechnical Evaluation (Appendix F) of the Draft EIR for an overview of the existing geologic conditions. Based on a review of the referenced background data, subsurface exploration, and geotechnical laboratory testing, Ninyo & Moore noted that construction of the proposed improvements is feasible from a geotechnical standpoint. In particular, the evaluation found that underlying the topsoil is decomposed granitic rock in varying degrees of weathering including granitic rock corestones and boulders. Based on the evaluation, the contractor would be prepared for the use of heavy ripping, rock breaking, rock coring, and/or blasting techniques to perform onsite excavations. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I28-7	Deleterious impacts to listed Endangered Species and Species of Special Concern are unmitigable. Habitat type-conversion and impacts from active recreation on this site will cause irreversible loss of unique habitats and sensitive species of flora and fauna. Proximity to Wright's Field Ecological Preserve will trigger Land Use Adjacency Guidelines due to intensive land use for active recreation abutting existing protected lands within the Multiple Species Conservation Program (MSCP). Significant indirect impacts to preserved lands and covered species therein are not compatible with the spirit of the MSCP Subarea Plan. In a letter to the Alpine Community Planning Group dated October 27, 2006, DPR Director Renee Bahl stated, "As you know, the County has previously evaluated Wright's Field as a potential site for park and determined that Wright's Field is not suitable for the development of an active recreation park…Our concerns regarding the biological sensitivity of the habitats within Wright's Field have not changed and we do not believe that Wright's Field is suitable for active parkland development." ***How can the County propose mitigation for the destruction of Native Grasslands when your team has previously called such destruction unmitigatable?***	Significant impacts on biological resources are anticipated as disclosed in the Draft EIR. Proposed mitigation for impacts on special-status species is also described in the Draft EIR. Additional details are provided in the RS-Draft EIR. Please also see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation** for a summary of how the loss of native grasslands will be mitigated.
I28-8	Our long time partner, San Diego County Parks, has become our latest adversary. Locals like myself strongly support a natural park to complement the existing Wright's Field MSCP Preserve. We also support revitalizing existing athletic facilities at schools or developing new sites for some of the active sports facilities, including an all wheel park, in town center. Welcomed management would include habitat restoration/removal of invasive species, clear trail delineation/signage, and parking that does not displace endangered habitats. ***How can the County morally and ethically destroy an existing natural park and replace it with an artificial one?***	This comment referring to a reduced scope alternative is noted for the record. **APM-BIO-1: Establishment of the Open Space Preserve** (Section 4.4, *Biological Resources*) states that, as required under the County's MSCP Subarea Plan, an approximately 70-acre open space area will be established and managed in perpetuity in accordance with an RMP that will outline management activities. The RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term management and monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning

Comment#	Comment Text	Response
		habitat. As part of operations of the project, signs would be clearly posted containing park rules and regulations that would be enforced at the park and live-on volunteer and park rangers will monitor the open space and Alpine Park. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Management, for additional details. A passive park alternative has been analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR. See MR-10 (Passive Park Alternative) for further details.

Comment Letter I29: Jim Jacobs, October 19, 2021

Comment#	Comment Text	Response
I29-1	We would appreciate being able to bid on this project when plans and specs. Are available. Our section would be metal roofing and shade structures. Would also like to receive a list of general contractors bidding. *Thank you.*	This comment and the included contact information will be shared with the County of San Diego Board of Supervisors. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I30: Peggy Katz, November 15, 2021

Comment#	Comment Text	Response
I30-1	As a resident and now senior citizen of Alpine since 1978, I have seen many changes in our community and I appreciate the availability of the documents at our library for our review as we embark upon this project. My concerns are regarding issues assessed as or described as being not addressed or having "minimal impact". It does seem that the goal of this DEIR is to push through this project ASAP	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I30-2	The land now designated as Wright's Field Ecological Preserve has immense environmental, geological, historical and archaeological value. One reason it is unique is because of the four sensitive habits (coastal sage scrub, native grassland, vernal	This is an introductory comment about the unique value of Wright's Field that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	pools and Engelmann oak woodland) all represented in a rather small land parcel and in a vital wildlife corridor.	
I30-3	It also has been determined that the area is an ancient river that silted upwards, most geologically interesting! There is a prevalence of clay soils which don't percolate and are peppered with cobble as well as somewhat smooth boulders of various sizes and compositions. There may be no other place like it, not only in the county, the state nor the entire country. Thus it deserves preservation and further scientific research.	This is an introductory comment about the unique geologic value of Wright's Field that precedes specific comments. No further response is required. No changes to the Draft EIR are needed.
I30-4	Question: Why would the county not want to vigorously protect and preserve this special site?	The County would be preserving an approximately 70-acre parcel of land—Alpine Park Preserve—adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional details. In addition, to mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its BMO to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided per **MM-BIO-9** and **MM-BIO-10** within the open space and/or within offsite location(s), as summarized in Section 4.4 that would include habitat-based mitigation and restoration of grassland. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I30-5	Many rare and endangered plant species thrive there. The mostly larger rural parcels surrounding the site have all been disturbed by development thus these species are no longer present or minimally present. Question: Why does the county not seriously embrace species conservation efforts?	See the response to comment I30-4. Please also refer to **MM-BIO-1** to **MM-BIO-14** in Section 4.4, *Biological Resources*, and MR-2 to MR-6, which detail proposed conservation efforts. Additionally, without the project, a Habitat Conservation Plan would not be created for the project area. Additional details are provided in the RS-Draft EIR.
I30-6	This area is now designated as being of EXTREME WILDFIRE RISK and residents are encouraged if not mandated to maintain our properties with respect to WILDFIRE mitigation. Because of this persistent FIRE threat and official designation of EXTREME FIRE HAZARD, our homeowners insurance is now very very expensive, difficult to get and always subject to cancellation or further rate increases. Almost all fires here are the result of human activity; lightning strikes in this part of Alpine are rare. Do we really want picnics with BBQs and the associated risk in this area? Question: Why has the county planned an ambitious complex that would encourage hundreds of vehicles and potentially thousands of people to recreate in this area putting residents at increased FIRE and safety risk with further crowding of our curvy dangerous S. Grade Rd. and inadequate egress to escape a fast moving FIRE disaster?	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the Draft EIR are needed.
I30-7	Another concern is our air quality. In the early days of Alpine, the area was historically renowned for having the cleanest freshest air around. It was a therapeutic destination where people afflicted with pulmonary disorders would come specifically to heal and rehabilitate. Now Alpine suffers with too many days of extremely high and unhealthy levels of air pollution, much of it ozone coming from LA county. This is unlikely to be mitigated in the near or distant future. Question: Why has the county not properly and realistically addressed our air quality problem in the DEIR?	Air quality impacts were analyzed in Section 4.3, *Air Quality*, of the Draft EIR. Impact-AQ-1: Objectionable Odors was identified but would be mitigated to less-than-significant levels through **MM-AQ-1: Prepare and Implement a Manure Management Plan**. Emissions (including ozone precursors) resulting from the construction and operation of the project would not exceed the County's Screening Level Thresholds and, as such, impacts would be less than significant. The comment does not identify any specific inadequacies with the analysis; therefore, no further response can be provided. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I30-8	With global warming and the role of Carbon being a topic of critical importance, research has emerged showing the necessity of preserving our dwindling grasslands not only locally but worldwide because of the role grasslands do play in the removal of Carbon from the atmosphere and Carbon sequestration in the roots, thus in the ground. Grasslands do it best. If a tree or shrub burns that Carbon is released back into the atmosphere but when grasslands burn that Carbon remains underground. Question: Why has the county not considered this in the DEIR as a vital reason against destroying a significant area of grassland in Wright's Field?	See MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation** for more detail on how impacts on grasslands will be mitigated. Please also see MR-8 (Greenhouse Gases and Energy) for additional information on the project's impacts on carbon sequestration and GHG emissions.
I30-9	The majority (80+% I believe) of our resident population really don't want a sports complex or any other major disturbance of the land. We only want a smaller nature-based educational park. Current plans for the entire complex are incompatible with an ecological preserve. You are not preserving a sensitive environment by creating a "drive to" park which invites hoards of people into this critical and rare wildlife corridor. Question: Why would the county want to further fragment and sacrifice anymore of this sensitive environment for human recreation?	The commenter's preference for a reduced scope alternative is noted for the record. Please also note (see MR-10) that the RS-Draft EIR includes a passive park alternative.
I30-10	I agree that the other community wishes are needed but they should really and appropriately be located closer to a safer area with a higher density population. One location that comes to mind is the old Alpine Elementary school property. Could a long term lease be considered for the site? The move on buildings could be removed allowing room for more sports facilities. There were some tall raised beds present that are handicap accessible or appropriate for older gardeners. There is probably room for shorter beds to be installed. There had been a nice selection of fruit trees as well. Cal State Fullerton has beds on their premises which are rented to community members as well as students who wish to garden. There is usually a waiting list. Many users could walk there for recreation. Residents of rural parcels already have land upon which they can garden should they choose to do so. Noise, lighting and increased traffic would not	The commenter's suggestion for an alternate location is noted. Please refer to Chapter 6, *Alternatives*, of the Draft EIR for a discussion of the alternatives considered including the Alternate Location Alternative. Additionally, please refer to MR-12 (Parks Master Plan), which details why this location was selected compared to others. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	impact a sensitive environment and the fire risk would be somewhat mitigated. During our many Santa Ana wind events, wind velocities can be quite intense but are usually tamer in town, another concern regarding fire risk.	

Comment Letter I31: Peter Krantz, November 15, 2021

Comment#	Comment Text	Response
I31-1	As a resident of Alpine for nearly 30 years I ask you to please reconsider the size and scale of this mega park.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's implied preference for a reduced scope alternative is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I31-2	In a time when we are in a severe drought how can we bring such a water burden to our community, while asking us to conserve. This land has always had issues with drainage and difficulty "perking" for septic. That is probabbly why it was never developed.	Please see the response to comment O8-76 for an overview of the Draft EIR's analysis of water supply. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Regarding the proposed septic system, please see the response to comment I28-4. For additional information please refer to Section 4.7, *Geology and Soils*, of the Draft EIR. No changes to the Draft EIR are needed.
I31-3	The loss of sensative rural land is not what the people wanted. (Please refer to your own focus groups). I have raised two children in Alpine and they had plenty of places to play, bike and attend structured youth sports. One has recently bought his own home here in Alpine hopeingto raise his kids with the same upbringing.	The commenter's desire to retain rural land is noted for the record. As is described in the Draft EIR, the active park would only occupy a small portion of the entire area currently undeveloped. No changes to the Draft EIR are needed.
I31-4	The negative enviromental impact, road problems, sewer and water issues alone should be enough to stop this mega park.	Please refer to the appropriate sections in the Draft EIR, which conclude that resultant impacts (inclusive of mitigation where needed) would be considered less than significant. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I32: Annalisa Larm, November 15, 2021

Comment#	Comment Text	Response
I32-1	Yes, we are in favor of Local Alpine Park.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I33: Jeff and Alanna Light, November 12, 2021

Comment#	Comment Text	Response
I33-1	Thank you for the opportunity to comment on the Alpine Park Project's (Project) Draft Environmental Impact Report (DEIR). My husband and I live on Calle De Compadres Cul De Sac at the proposed entrance to the Alpine Park. We have lived in Alpine for over 25 years. After going through the DEIR, we have questions and concerns, most of which were noted from all of the residents of Calle De Compadres in a letter written April 3, 2021 RE: Notice of Preparation of a Draft Environmental Impact Report on the Alpine County Park Project.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I33-2	Most of our concerns documented such as noise pollution from the dog park, active sports facilities and high volume of traffic and people, parking issues in our cul-de-sac, light pollution and increased fire risk have not been sufficiently analyzed in the DEIR.	The concerns referenced in the comment have been addressed in the Draft EIR and the impacts are deemed to be less than significant (inclusive of mitigation where necessary). For additional information, please see Section 4.1, *Aesthetics and Visual Resources*, Section 4.13, *Noise and Vibration*, and Section 4.17, *Transportation*, of the Draft EIR. Please also refer to Section 4.20, *Wildfire* of the RS-Draft EIR. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I33-3	**LACK OF NOISE BERM BY CALLE DE COMPADRES CUL-DE-SAC**	Measurement location LT-1 referenced in Table 4.13-2 in Section 4.13, *Noise and Vibration*, outlines noise levels ranging during the day from 54–64 dBA. Noise levels of this magnitude would

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	Why haven't you mitigated for noise abatement for the residents living on Calle De Compadres? Your "noise berm" stops before the proposed dog parks.	average out to 57 dBA L_{eq} based on measurements taken for the project. Noise contours associated with the project included on Figure 4.13-2 show that noise levels during operation of the project would be approximately 54 dBA L_{eq}, which would not have a significant impact on the neighboring residential areas and would be in compliance with the County noise level requirements. Table 4.13-12 has been updated in the RS-Draft EIR to reflect this averaged noise level and the resultant adjusted sound level limits. Additionally, the paragraph preceding the table has been amended to reflect the following information: "however, LT-1 is more representative of homes in the general vicinity. Therefore, both are included." Based on the above information, the project would not have a significant impact.
I33-4	**OVERFLOW PARKING/TRAFFIC ON CALLE DE COMPADRES CUL-DE-SAC** Why have you not addressed overflow parking on Calle De Compadres or the impact on its residents when park goers use the cul-de-sac for turning around? If the Project charges for parking, visitors will find free parking on Calle De Compadres, negatively affecting the peace and quiet of our neighborhood as well as possibly endangering my dogs and horses which are often pastured by the entrance of the Project.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would include up to 240 parking spaces, although all spaces are not expected to be occupied during typical operation. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed.
I33-5	**LOCATION OF DOG PARK/LOOSE DOGS/NOISE** Why did you choose the location of the dog parks to be adjacent to South Grade? Not only do you not install a noise berm, but you have added more ongoing noise across the from Calle De Compadres.3	The results of the analysis (presented in Section 4.13 of the Draft EIR) indicate that project-related operational noise would increase the ambient noise level by no more than 3 dB. While the analysis indicates that an increase in noise may occur, any increase would comply with applicable thresholds laid out in the San Diego County Code of Regulatory Ordinances. Please also

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		refer to MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I33-6	In addition, have you investigated the impact on traffic, pedestrians and equestrians should a dog get loose and run onto South Grade? Common sense deems the dog park should not be on the perimeter of the Project.	Park rules would require dog owners to be responsible for the actions of their pets, similar to any other public park. No further response is required. No changes to the Draft EIR are needed.
I33-7	**SPECIAL EVENTS PERMITTED TO 10PM/LIGHT POLLUTION** How come you are allowing special events to be held until 10pm when we have been told over and over that this park will only be in use from sunrise to sundown? Do you have a limit of "Special Events" that can occur throughout the year? Are you planning to mitigate the impact of additional lighting that will negatively affect the dark skies of Alpine?	See MR-13 (Noise and Lighting) for more information on lighting impacts. No further response is required. No changes to the Draft EIR are needed.
I33-8	**CALCULATION OF AVERAGE LOCAL HIGHS** Why did you base your average local highs from data that starts from 1951? With global warming the average local highs are no longer 76.4 degrees. There are multiple days over 90 degrees in the summer and with the addition of artificial turf and thousands of feet of concrete, the playing area on the Project will likely be unusable as global warming continues to increase. There are already County Parks that are closed in August due to high temperatures. Will this be the case for this Project as well?	This comment raises concern about the calculations of average local high temperatures used in the Draft EIR. The average local high temperature was included in the EIR to provide local context and the data were obtained from the Western Regional Climate Center, which used the 1951 to 2016 time period. The project follows DPR Policy C-33 during red flag warnings and Policy C-40 during a fire event. During each of these times there is an increase in patrols around the open space and more frequent interactions with visitors by the staff. No changes to the EIR are needed.
I33-9	**WATER** First off, the DEIR estimates annual water needs as 16,471,273 gallons and there is no commitment that Padre Dam will be able to accommodate that need. But even with that ludicrous amount of water, I question if that amount of water is even enough to keep the real grass playing fields alive and if the above temperatures were considered when evaluating the amount of water needed. Did you include water needed to water down the artificial turf for the baseball field in your calculations? Artificial turf is adversely affected by high temperatures.	Please see the response to comment O8-76. For additional information on water supply assessment, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the Draft EIR are needed.

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	Regarding purchasing water from Padre Dam and water usage: According to weather-and-climate.com, the average precipitation in Alpine is 10.31 inches a year **NOT** 16 inches per year as per your Project states. How will the change of 4 ½ inches of rainfall impact your calculation for water use and future needs. Please recheck your current evaluation of water needed, incorporating the increase of Alpine temperatures due to global warming and significantly lower average annual precipitation to get an accurate assessment of the Project's water needs. According to the San Diego Water Authority, "The 2021 water year was the driest in California in more than a century." My family adhered to past requests from the water district to change landscaping to prosper in our desert-like environment. My lawns our gone and in their place is an artificial turf lawn and hardscaping. Looking around Alpine I see many others who have adhered to the same request. Please explain why you want acres of water thirsty sod in the Project when global warming and increasing drought years point to eliminating sod altogether. ***For the County to ask for, and for Padre Dam to commit to selling water for a park of this magnitude while telling everybody else to be "water wise" and without having accurate calculations of increased water need is wasteful and hypocritical.*** We feel strongly that because of miscalculations of precipitation and temperatures in Alpine, compounded with ongoing global warming, that the projected water needed is incorrect and will cost the taxpayers an insurmountable amount of money as the realization of this situation occurs. Because of this, expansive playing fields of sod is irresponsible, financially and environmentally.	
I33-10	**EXPANSIVE SOIL IMPACT ON STRUCTURES AND ASPHALT PARKING**	Please refer to MR-14 (Geology and Soils). The Geotechnical Evaluation describes the presence of expansive clay soils on the

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	The soil in for this project is unstable, expansive and has a high shrink/swell behavior. As residents adjacent to the Project, we are highly aware how it negatively impacts foundations and roadways. Here are pictures taken on November 8, 2021 of the asphalt street on Calle De Compadres and two of the properties. The asphalt parking lot will look like this within a few years unless you included an extensive maintenance plan to accommodate this soil. 	site and provides recommendations to mitigate these conditions for structures and for the design of pavements. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	  	

Comment#	Comment Text	Response
	 	

Comment#	Comment Text	Response
I33-11	Although the DEIR mentions the volunteer pad, how do you plan on mitigating the foundation for the skatepark park which is entirely concrete, the basketball courts and the pickleball courts? Much of this expansive soil will have to be removed at an enormous cost and as it is not suitable for building fill, who is going to want it?	Please see the response to comment I33-10, above. No changes to the Draft EIR are needed.
I33-12	**CIRCULATION/TRAFFIC** I would like to have more information on how the DEIR can possibly state that 500 daily visitors will not have a significant impact on traffic on South Grade and Tavern Road and that no mitigation is needed. As 25-year-residents living off South Grade Rd., we have seen numerous accidents, near accidents and fatalities. We watched traffic on South Grade gridlock during the 2003 Fire evacuation. There is no concrete plan to widen South Grade Rd. to allow emergency vehicles to drive through. There are no bike paths on South Grade to the project site. It is unsafe for pedestrians to walk on the street. There is no public transportation stop to the Project. As this is a County Park and most people travelling will come to Alpine and take the Tavern Road exit, the first entrance to the park will be on the South end of the Project, not Calle De Compadres. Have you considered how this will affect traffic if there is no stop sign on South Grade at that exit? Have you looked at putting an additional stop sign by that exit so people can safely enter that entrance? Increased circulation around the Project will lead to additional injuries and fatalities on South Grade. This portion of the DEIR needs to be readdressed as any injuries and fatalities due to trivializing the negative impact of an	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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	additional 500 visitors a day on an already dangerous two-lane road is negligent.	
I33-13	**FIRE DANGER** The more people who go to this park, the higher possibility of a human caused fire. Whether it is from a BBQ or smoking, or an accident from the volunteer resident in their home, the dry grasslands that surround the park is extremely flammable and the roads surrounding Wright's Field are barely sufficient for current evacuations. Unless there is a definitive commitment that the roads will be widened, it is negligent to agree to build a park that will attract 500 people a day.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.
I33-14	As my husband and I have stated in the past, we would like a smaller nature-based community park. Where is the option of smaller parks throughout Alpine? Why isn't there an option that eliminates the sod and baseball field? Alpine does not need acres of playing fields, a concrete skateboard park or basketball and pickle board courts. There are playing facilities in Alpine, but most are not maintained. Both of my children grew up in Alpine and played AYSO, softball and Little League. This was BEFORE the decline of children in Alpine and an elementary school was closed. This was BEFORE the numbers didn't warrant a High School!	The commenter's preference for a reduced scope alternative is noted for the record. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the Draft EIR are needed.
I33-15	I anticipate that this Project, if approved, will not only ruin the rural feel of this community, but it too will fall into disrepair once the County realizes the high cost of operation & maintenance as well as lack of anticipated use due to extreme heat.	This comment raises general concerns regarding potential conditions of extreme heat in the future. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I33-16	Time and time again you ignore the concerns of residents, the effects of global warming, ongoing drought and the dangers of putting a massive park along a dangerous two-lane road and say that there is no mitigation needed. This DEIR is flawed and needs to be reanalyzed.	Please refer to Section 4.3, *Air Quality*, of the Draft EIR; the project would have less-than-significant air quality emissions and no mitigation is required. As stated in Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR, GHG emissions would be less than significant with implementation of **MM-GHG-1** and **MM-GHG-2**, and there would be no significant impacts regarding GHGs. Additionally, please

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		refer to MR-8 (Greenhouse Gases and Energy), which details the level of carbon sequestration the project would have with implementation. As discussed in Section 4.19, *Utilities and Service Systems*, of the Draft EIR, the project could potentially cause significant impacts on water resources as well as MR-15(Water and Wastewater). However, the project would implement **MM-UTIL-1**, which would require the development of a water study prior to issuance of building permits to determine if the project would require an expansion of water facilities to accommodate the development. If the project is determined to require an expansion of water facilities, County DPR would be required to construct the necessary improvements prior to the issuance of building permits. Please refer to Section 4.17, *Transportation and Circulation*, of the Draft EIR and MR-7 (Transportation and Safety), which detail that the project would not create any significant traffic hazards in the project area. With the previously mentioned mitigation measures, associated impacts from the project would be reduced to less-than-significant levels. No changes to the Draft EIR are needed.

Comment Letter I34: Angie Lind, October 8, 2021

Comment#	Comment Text	Response
I34-1	1. Alpine residents already has a county park at Flinn Springs	The County appreciates the comments submitted on the Draft EIR. The comment regarding residents having a county park at Flinn Springs is acknowledged. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required No changes to the Draft EIR are needed.
I34-2	2. The proposed Alpine park is located adjacent to Southgrade road that has no side walks and vehicles travel in excess of 50 MPH routinely. Hence the park is not walkable to and from for	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	the majority of residents including children. This is a huge safety issue for children who want to bike or skate board to the park.	
I34-3	3. According to Megan's Law website there are 2 registered sex offenders located across the street from this proposed park for children. One sex offender was convicted of sexual offenses with children under the age of 14. The other sex offender had child pornography. Seems to me it is not safe to have a park across the street from these sex offenders.	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I34-4	4. The park will be a magnet for homeless encampments like other county parks in Wright's field which could cause fires due to unauthorized cooking	This comment suggests that the project would result in an increase of homeless encampments in the project area. Please refer to Section 4.15, *Public Services*, of the Draft EIR for information regarding police protection services. The Draft EIR acknowledges that an increase in visitors could result in an increased demand on police protection services. Recognizing this, events that require police and emergency services planning would continue to be coordinated with the County Office of Emergency Services to establish safety protocols. Also, the park will include a live-on park host, maintenance staff, and regular park ranger patrols, which would be part of the park's operating plan, with the authority to evict any unwanted park occupant. Furthermore, the San Diego Sheriff's Department has a goal of providing one patrol position per 10,000 permanent residents, and the increase in regional residents and visitors to the new amenities at the project site would not be expected to be substantial enough to affect that ratio. No changes to the Draft EIR are needed.
I34-5	5. The park is a manmade structure that replaces nature with a parking lot, ball fields, skating rink, dog park, etc. Definitely not low impact activities. This will definitely have an adverse impact on song birds (due to noise from the park) and flora and fauna in Wright's field.	Significant impacts on biological resources are disclosed, and proposed mitigation for impacts on special-status species and vegetation communities are described, in Section 4.4, *Biological Resources*, of the Draft EIR. **MM-BIO-9** provides compensatory habitat-based mitigation, while **MM-BIO-1** through **MM-BIO-8** provide guild- and species-specific mitigation. Please also refer to responses to comments I28-8 and I30-4 for information on the planned open space (Alpine Park Preserve) that will be situated adjacent to the planned park.

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		Additional details are provided in RS-Draft EIR Section 4.4, *Biological Resources*, and the BRR.

Comment Letter I35: June Lundstrom, October 10, 2021

Comment#	Comment Text	Response
I35-1	As a resident of Alpine, CA and one who lives close to South Grade Road, I want to express my complete rejection of the analysis and review of the Alpine Park Project EIR with regards to the effects of the proposed park on local street traffic flow and fire evacuation implications. I believe that the EIR completely disregards the fact that South Grade Road will be the primary ingress/egress for the proposed park. South Grade Road is basically a "country" road, with no sidewalks, blind corners and curves and is essentially a residential community road. The amount of traffic that would increase as a result of such a large and elaborate park, with so many facilities, would be abysmal to the local community. More dangerous accidents would occur, without a doubt.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I35-2	Also, as everybody who live in Alpine knows, it is a very high fire danger area. And an auxiarlly effect of the increased traffic is also the danger to slowing down critical evacuations in the event of a fire. Both for people who may be at the park and, critically, for the residents along South Grade Road and adjacent residential areas.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.
I35-3	These concerns are real and have been completely ignored or disregarded by the EIR. I am very concerned that the project is being give a "green light" for political reasons and not for the good of the neighborhood.	The commenter's opposition to the project is noted for the record. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I36: James Mason, November 14, 2021

Comment#	Comment Text	Response
I36-1	Thank you for the opportunity to comment on the Alpine County Park Draft Environmental Impact (DEIR). As a 28- year resident of the rural town of Alpine, I have multiple concerns regarding the DEIR as it pertains to this proposed park, its scope, need, and development.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I36-2	Of primary concern is the biology of the proposed park (reference DEIR section 4.4 Biological resources). The proposed County park is physically contiguous with the Wrights Field Ecological Preserve which carries MSCP designation. This environment is a unique 80-million-year-old geological river bed now characterized as Lusardi Formation. The resultant ecosystem is a very rare combination of native grassland and Engelman Oak woodland. Native grassland is a rare and diminishing environment is California constituting less than 2% of flora.	**APM-BIO-1** would establish an open space area (see responses to comments I28-8 and I30-4) adjacent to Wright's Field Ecological Preserve. To mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its Biological Mitigation Ordinance to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided per **MM-BIO-9** and **MM-BIO-10** within the open space and/or within offsite location(s), as summarized in Section 4.4, *Biological Resources*, and would include habitat-based mitigation and restoration of grassland. **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures** would be implemented to minimize and avoid potential impacts on Engelmann oaks resulting from the project. Activities within the project would occur approximately 600 to 800 feet away from the eastern edge of Wright's Field. At this distance, indirect impacts from both construction at and operation of the active park are expected to be: (a) less than significant with mitigation (e.g., through noise or dust mitigation), (b) less than significant (e.g., only minor impacts), or (c) no impact (e.g., no night lighting). Please refer to MR-2 (Indirect Impacts on Wright's Field).
I36-3	Within this domain are multiple sensitive and threatened species including Western Spadefoot Toad, Ferruginous hawks, and protected species such as the Quino Checkerspot butterfly. Of note, the food source for larval Hermes Copper butterflies, Rhamnus corcea, exists on the County land as well as Wright's Field.	Western spadefoot has been addressed in the RS-Draft EIR. Please see MR-1 (Western Spadefoot Recirculation) and **MM-BIO-4: Western Spadefoot**. Impacts on QCB are disclosed in Section 4.4, *Biological Resources*, of the RS-Draft EIR. Please see MR-4 (Natural Resource Mitigation) and **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat.** Hermes copper was determined to not be present within the County's parcel after extensive

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		surveys were conducted. The primary habitat area where spiny redberry (*Rhamnus crocea*) was observed was outside of the County's parcel within the Wright's Field Preserve. Ferruginous hawk is a Covered Species under the MSCP and wildlife agencies have determined that conservation efforts as part of MSCP implementation will adequately conserve this species. No changes to the Draft EIR are needed.
I36-4	At this location, the grassland (Valley Needle Grass) extends from Wright's Field on the west to South Grade Road on the east. The proposed Alpine County Park as designed will have a devastating impact on the Native Grassland as well as avian foraging habitat. There will be at least a 65% reduction in grassland on the 97 county acres	Please see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation**.
I36-5	This leads to the following questions: 1. Given the paucity of native grasslands (VNG) in California, how can this be mitigated? Is it legal to mitigate native grassland with non-native grassland or other?	Please see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation** for a summary of how the loss of native grasslands will be mitigated. No changes to the Draft EIR are needed.
I36-6	2. Previously in 2009 the County determined that this land was non-mitigable for a high school, which is a similar level of development. Given that there has been no major change in the environment, except perhaps even less statewide native grassland, how is it possible that it can be mitigated now?	See the response to comment O8-24. No changes to the Draft EIR are needed.
I36-7	3. Given the heavy non-filtrating clay soil, how will water damage to the fragile ecosystem of Wright's Field, which lies downhill from the county land, be averted?	Please refer to the response to comment O2-20. No changes to the Draft EIR are needed.
I36-8	4. Finally, given the damage that will likely occur to the grassland etc. and the difficulty with mitigation, why was a passive natural park alternative not included in the DEIR?	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative).
I36-9	I truly appreciate the opportunity to comment and state my concerns regarding the Alpine County Park DEIR.	The County appreciates the comments submitted on the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I37: Anne Falasco Norton, November 14, 2021

Comment#	Comment Text	Response
I37-1	On April 2, 2021 I sent to your department my NOP letter and asked that my comments be further analyzed and commented on in the DEIR. The following are quotes from my letter and my concerns that your department neglected to respond in a thorough manner within the DEIR.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I37-2	In my NOP letter I state: "In previous statements to the County and to the Alpine Community Planning Group (ACPG) and in published Letters of the Editor of the Alpine Sun I have made it quite clear that ideally the Project's land use should remain passive. Where the land is presently disturbed, only that area should be designed for parking and minimal facilities. The active portions of the Project should be removed and other locations should be identified. This alternative should be analyzed in the EIR.	The commenter's preference for a passive park alternative and alternate location is noted for the record. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a discussion of the alternatives considered including the Alternate Location Alternative. Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6 *Alternatives*. Please refer to MR-10 (Passive Park Alternative) for further details. No changes to the Draft EIR are needed.
I37-3	In addition, at last week's ACPG meeting I offered an alternative location for many of the Project's activities that are not suitable to the Project's location: Alpine Elementary School (AES) in the heart of Alpine. It is an historical site sitting idle and empty. This site could be the perfect fit with regards to providing the activities in the park (the skateboard and bike parks, the playing fields, the community garden and the dog park) that ought to be clustered within the higher populated area of Alpine. This higher populated area is our village center. If designed properly, AES could become a stalwart example of incorporating historical value with the present needs of our community. AES already has the infrastructure. It has playing fields. It has reasonable off-street parking. It has existing electrical, water and sewage hookups. It addresses the traffic flow. Fields could be lighted without causing light pollution. Situated at the school, in the heart of town, the bike, skate and dog parks would not cause noise pollution. This is the location where these types of activities belong and are best served. This alternative should be analyzed in the EIR.	CEQA Guidelines Section 15126.6(a) states that an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Chapter 6, *Alternatives*, of the Draft EIR provides a reasonable range of alternatives to the project. Additionally, the Draft EIR describes two alternatives that were considered but rejected including the Alternate Location Alternative. The reason why the Alternate Location Alternative was determined to be not feasible is provided in Chapter 6, *Alternatives*. Please also see MR-12 (Parks Master Plan) for additional details. See the response to comment I37-2. No changes to the Draft EIR are needed.

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I37-4	Another alternative park site in the heart of Alpine is the old Alpine School District's offices which also have similar amenities that are suitable for the active portion of the Project. This alternative should be analyzed in the EIR."	See the response to comment I37-2. No changes to the Draft EIR are needed.
I37-5	Were my requests for response ignored and deemed frivolous because DPR was working under the perimeters and protocols necessary to abide with funding which DPR was granted? I can only conclude this is the real scenario because not once did your department ever reveal to my community during public comment the source of the funding. Had your department been transparent our community would have had reasonable knowledge of your department's real intention of creating a Regional County Park that would draw hundreds of people to our area and disrupt our unique environment; not the "Community Park" with which your department has been promoting and persuading some of the public. I find this "bait and switch" tactic unethical, deplorable and disgusting. Why were my Project Alternatives not even addressed? My three alternatives give viable and very doable use of what already exists. All three minimize any and all mitigation. I request and demand that my comments be honestly and properly addressed as Project Alternatives and not be brushed aside as insignificant.	As discussed above in the response to comment I37-2, CEQA Guidelines Section 15126.6(a) indicates that an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Chapter 6, *Alternatives*, of the Draft EIR provides a reasonable range of alternatives to the project. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. Please refer to Chapter 6, *Alternatives*, for an explanation of the project alternatives and the reasoning for which alternatives were rejected. No changes to the Draft EIR are needed.
I37-6	Why was the DEIR Alternative Two even considered? To further wipe out even more land solely in the pursuit of a SPORTS Complex??	According to CEQA, an EIR must describe a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic project alternatives and would avoid or substantially lessen any of the proposed project's significant effects. Chapter 6, *Alternatives*, of the Draft EIR analyzed Alternative 2 as well as three other alternatives. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. No changes to the Draft EIR are needed.
I37-7	My NOP letter states: "This proposed park as it is presently planned will forever alter and change the character and ambiance of its bordering neighborhoods. Our home of over 30 years is part of Palo Verde Ranch and abuts South Grade Road, separated only by one	Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR, which describes the visual setting of the project and evaluates the potential impacts from the project on scenic vistas,

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	residence. We have an elevated view of the proposed Project. Instead of the peaceful atmospheric views we now enjoy, the land will be defaced with man-made activities, permanently eliminating the valuable natural resource that it is today. These impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." This park in its present proposed location will totally alter and impact the essence of Alpine. There is one common thread that the community embraces: we left the chaos and conveniences of city living and specifically chose to settle in a rural environment. The inconveniences do not outweigh the quaint, small town feel, the measure of relative safety, and a sense of peacefulness and isolation. As a whole Alpiners are not threatened by progress but we are threatened by destruction of what we know as and love of our community. This park poses a direct threat to our essence. Its location is totally out of our town's character, drawing inordinate traffic flows onto two-lane rural roads not built or improved to handle such volume.	scenic resources, visual character, and light and glare. No changes to the Draft EIR are needed.
I37-8	One prideful aspect of Alpine is the approximate 350 acres in the middle of Alpine that we all call Wrights Field. Though not really accurate, the County's 90+ acres that are in question have been considered part of Wrights Field by the locals for the longest time. This entire expanse of open land is what makes Alpine stand out and captures our town's uniqueness. It is unbearable to fathom losing this natural and irreplaceable gem to a mandate by the County for the sake of "What Man Deems Best."	While it is correct to note the larger size of the entire County-owned parcel, only approximately 25 acres would be occupied by the active park, in addition to open space that would be approximately 70 acres as part of the project, and substantial separation (i.e., 600–800 feet) would be provided between the active park and Wright's Field. No changes to the Draft EIR are needed.
I37-9	"Direct impacts to our neighbors and ourselves include increased noise for the activities within the park and noise generated from the drastic increase of traffic to reach this destination park. Barking from dogs, constant sounds of skateboards against hard concrete and the tires creating dust from the bike skills area will be a constant annoyance to the neighbors and certain deterrents to the wildlife who make this area a safe animal pathway. Noise from all the activities will resound throughout the neighborhood directly impacting the	Please see MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.

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	area…non-stop…til dusk due us part… These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance. "	
I37-10	In my NOP letter I state: "Dog-transmitted diseases, some of them airborne, and the stench of poo and urine will permeate the dog park grounds adding to the risks of disease and serious dog fights typical at such sites. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." It does not appear that the DEIR seriously reviewed or sought studies regarding the dangers of community dog parks. Conscientious studies online indicate the many health risks through infection or canine aggression occur at dog parks. Diseases include canine distemper, influenza, parvovirus, leptospirosis, kennel cough and rabies. These diseases can be found in the soil, water and even the air. Even with treatment these can be fatal. Who will monitor dog owner compliance to these potentially life-threatening conditions? How can we be assured that the enclosures are disinfected properly and bleached in a timely manner? Spell it out. Who will be responsible?	Daily maintenance of the park (including the dog park area) would be the duty of the permanent onsite live-on volunteer, park ranger, and maintenance staff. Also included in the ranger's duties would be the enforcement of appropriate compliance with park rules for dog owners visiting the park. No changes to the Draft EIR are needed.
I37-11	Studies show that "off leash dog play among dogs from different households is a complex and difficult dynamic which should not be attempted by the average dog owner." Dog to dog attacks are quite common and veterinarians report seeing multiple injuries every week from Dog Park attacks. Owners think they know a lot about animal behavior and frankly most do not and poor choices are made. It is a recipe for dangerous dog behavior often leading to serious injuries or even death. Dogs innately defend themselves and that is where aggression is exhibited and, hence, fighting breaks out. Dogs are not the only ones at risk in or near dog parks. Children and adults are attacked, sometimes viciously, sometimes being bitten when reaching through a fence and sometimes trying to	Please see the response to comment I37-10, above.

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	break up a fight, trying to protect their pet. Who then is ultimately responsible?	
I37-12	What will be the fencing used and height of the fence per separate enclosures for the smaller dogs and the larger dogs? What will be the maximum number of dogs allowed in each enclosure at any given time?	The proposed dog park fencing would be a 6-foot-high chain link fence with a black vinyl coating. The large dog area is meant to accommodate dogs over 20 pounds. No changes to the Draft EIR are needed.
I37-13	Was the noise level of the dog park even properly addressed as an impact? My research indicates that "100 dB, average dog park between 4-700 Hertz, distance from nearest neighbor is 650 feet." What will the mitigation be regarding these disturbing noises and potential health hazards to the public neighboring homes? Does the DEIR even address how these noises will resound and be carried in this particular location, added to the other constant noise-making activities within this park?	Regarding noise, please see Draft EIR Section 4.13, *Noise and Vibration*, which concludes that noise levels would not exceed impact significance criteria. The SoundPLAN modeling modeled all land uses included on the project site. Please also refer to MR-13 (Noise and Lighting). No changes to the Draft EIR are needed.
I37-14	The DEIR neglects to properly justify the impacts of domestic dogs on the wildlife and water quality which with their presence causes stress on the present wildlife environment and the potential contamination of water quality. All of the scenarios listed are real possibilities. Most create risk of civil or criminal charges. More detailed information and justification needs to be addressed in the DEIR.	Daily maintenance of the park (including the dog park area) would be the duty of the permanent live-on volunteer, park ranger, and maintenance staff. Also included in the ranger's duties would be the enforcement of appropriate compliance with park rules for dog owners visiting the park. No changes to the Draft EIR are needed.
I37-15	In my NOP letter I state: "We pride ourselves in being part of a Dark Sky zone. People throughout the county come to Alpine to view stellar phenomena. Having a permanent on-site trailer/home generating light and the additional lighting within the park to deter crime will totally end this treasure. God forbid when the County allows lighted ballparks….total destruction. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." It puts fear down to my bones that the DEIR Alternative Two was published as a viable alternative. This alternative allows for lighted fields not to end at dusk but to be allowed 7 days a week until 10 pm each and every night. Where is this justice or an ounce of fairness to our town as a whole with traffic constricting	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.

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	all our two-lane rural roads to fit all these extra vehicles? Where is their consideration for those residential zones which comprise all of the routes to and from the proposed park? Where is the respect for the Dark Sky zone?	
I37-16	My NOP letter states: "We have a working well which may be directly impacted by the draw of water use needed at the Project. Chemicals used to treat the lawns can cause air-borne allergies and affect ground water contamination. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." Show me proof that this will not happen.	The project would obtain its water supply from PDMWD. The project would not use any groundwater; however, in certain cases groundwater may be used in the event of a wildland fire on the project site. As discussed in Section 4.10, *Hydrology and Water Quality*, the discrete use of groundwater for emergency situations would not result in a substantial decrease in groundwater supplies or interfere substantially with groundwater discharge. In addition, the project does not involve operations that would interfere substantially with groundwater recharge such as regional diversion of water to another groundwater basin or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25 mile). Please refer to Section 4.10, *Hydrology and Water Quality*, for more information on the project's less-than-significant impacts on water quality. No changes to the Draft EIR are needed.
I37-17	My NOP letter states: "The Project will draw the need for more police protection from our Sheriff Substation which spills over with increased crime that directly affects the Project's neighbors who presently see very little crime. This impact should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance Please share your reasoning that a park this size that will draw people from throughout the county along with visiting out-of-county crowds for soccer, etc. events will not see an increase in crime for the entire town as a whole but also the immediate neighborhoods. Building this mega SPORTS complex within the confines of a residential zone is destructive to the climate of peacefulness and tranquility which is the essence of what Alpine is. We live in a reasonably low crime zone. The park's location effectively invites vandalism, homelessness and crime. How does	Please refer to Section 4.15, *Public Services*, of the Draft EIR for information regarding police protection services. The Draft EIR acknowledges that an increase in regional visitors could result in an increased demand on police protection services and more incidents requiring police intervention. However, events that require police and emergency services planning would continue to be coordinated with the County Office of Emergency Services. Additionally, the project would include a live-on volunteer, a park ranger, and maintenance staff that would conduct regular patrols and maintain the Alpine Park and open space. No changes to the Draft EIR are needed.

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	DPR plan to handle this safety hazard? Pass this responsibility on to the Sheriff's Substation?	
I37-18	My NOP letter states: "Traffic along South Grade will increase substantially with no reasonable mitigation offered. With this comes the increase of air pollution and safety issues. The parking allotment within the park indicates the county's plans for a high volume park. Overflow parking along South Grade and into the county-owned residential streets next to the park will be inundated during the "big events" that will be scheduled at the Project. Parking will remain a high concern because inevitably, parking within the project will have a price tag and Alpiners will not pay the price (nor should they). Therefore, we will continue to see the residents of Alpine park along South Grade and the nearby residential streets. All of this points to a heavily increased use of and heavily increase of danger and safety on South Grade Road which was not built for such volume. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance."	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Should parking overflow actually occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. The County will not charge for access or parking at the Alpine Park. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed.
I37-19	The DEIR says that "NO PARKING" signage will be placed along South Grade Road during events. Where is the overflow traffic supposed to then go? In addition there will be people who just do not wish to pay the park's parking fee and will seek the streets close to the park. This will have direct impacts on Calle de Compadres and Via Viejas/Nido Aguila/Avenida Canora. These small, narrow, quiet streets who normally only see the occasional neighbors or the postman are part of the residential development of Palo Verde Ranch and do not have safe pedestrian pathways or sidewalks. The DEIR neglects to address these impacts and neglects to offer mitigation to the nature of our existing streets and neighborhoods. It is unnerving and threatening to have strangers parked at all hours in front of their homes 7 days a week. Palo Verde Ranch and its neighbors have the right to demand that the building of this park does not destroy their sense of community or safety. The building of this park does just that: destroys the sense of community and safety.	Please see the response to comment O8-44. No changes to the Draft EIR are needed.

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I37-20	"The change of topography in order to achieve all the activities will drastically be altered when a "berm" will be constructed that will in effect halt all views of the park from the road. One of the beautiful and calming aspects of the existing property is that one can drive past the very open fields and with just glancing, obtain the sense of outdoors. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance."	Please see Draft EIR Section 4.1, *Aesthetics and Visual Resources.* In that section, "before-and-after" visual simulations are provided. These simulations demonstrate that views of the project site would not be substantially altered with the addition of the park. No changes to the Draft EIR are needed.
I37-21	My NOP letter states: "Presently, the Project effectively eliminates all access to Wright's Field (WF). One will be forced to travel through the Project in order to enter WF. By doing this, the County just added another layer of hindrance, effectively deterring its own residents from access to this wonderful gem. The other access area to the park is via a private road abutting Joan McQueen Middle School. No one is allowed to park on this private road and no designated spots exist to accommodate WF enthusiasts at Joan McQueen. The other "access" is at the end of Olivewood Lane with no adequate public parking. These numerous impacts should be analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." How are these impacts being addressed? Building this park actually eliminates the Alpine resident's easy access to Wrights Field where one can truly enjoy the benefits of nature. The DEIR needs to clearly answer my access questions during the building process and for the years to follow. What will the cost be to park in the mega parking lot? Why has it not been addressed how people will safely walk to this park that is located so far from the town's village? Is DPR going to build a park that cannot be safely accessed?	The project would provide a formalized parking lot with up to 240 parking spaces, and legal access to the existing and currently unformalized 1.1 miles of multi-use trails for public use that connect to Wright's Field. These trails would provide access to Wright's Field from South Grade Road. The other access areas to Wright's Field referenced in the comment are not part of the project and revisions to these access areas would not be changed. No changes to the Draft EIR are needed.
I37-22	"This project will hands-down substantially degrade the quality of the environment for all Alpine residents but more importantly: our dwindling wildlife habitat. It will further destroy a huge chunk of one of the last remaining grasslands in our county and State. These numerous impacts should be	The County has modified mitigation for Valley needlegrass grassland. Section 4.4, *Biological Resources*, of the RS-DEIR provides additional details on how the project could affect wildlife connectivity and corridors. Additional significant impacts on wildlife movement are not anticipated.

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	analyzed in the EIR. These impacts should be avoided or mitigated below the level of significance." The DEIR mentions voluminous amounts of disruption of the flora and fauna habitats yet gives a meager mitigation plan. Reading the consequences that will occur as the topography is demolished should be enough for any department who includes in their mission statement to preserve our natural resources to give pause. What is DPR doing? Where is DPR'S respect of our lands and our resources? This park strangles what little is left of the wildlife corridor. My NOP letter continues to state: "...The County should be the steward of our precious environment. Instead the County leaves the undeniable impression that paving over sensitive and diminishing lands to build more ball fields and whimsical structures to satisfy the short-sighted needs of the public is of utmost importance. This Project continues with the "Slash and Burn" attitude, denuding what is left of our natural resources."	Please see MR-3 (Native Grassland Impacts) and MR-6 (Wildlife Corridors).

Comment Letter I37a: Anne Falasco Norton, May 2, 2022

Comment#	Comment Text	Response
I37a-1	To Whom It May Concern: Please accept these following comments as supplemental to the comments I previously sent regarding this project.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I37a-2	There is another very viable alternative location to this planned park which would satisfy most, if not all, anticipated requirements without changing the entire town's environment, would better suit the needs of the population due to its central location	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and a discussion of alternative locations "that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (CEQA Guidelines Section 15126.6(f)(2)(BA)). The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set

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		forth only those alternatives necessary to permit a reasoned choice. No changes to the Draft EIR are needed.
I37a-3	and diminish and perhaps totally eliminate the costly impacts to safety, fire hazards, traffic, noise and light pollutions that will undoubtedly occur if this project was to remain in the proposed site. In addition, it is already hooked up to the sewer and the electrical and water already exists.	Please see Chapter 5, *Cumulative Impacts*, of the Draft EIR for information and a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. No changes to the Draft EIR are needed.
I37a-4	That site exists today as the old Alpine School District's Administration site located on Administration Way. This ample site is located near the CVS building that meets with Arnold Way and Tavern Road. This site has existing ball fields with plenty of additional disturbed land with buildings that could easily be upgraded to incorporate design aspects for the proposed park. Presently this site is not being used. It would be a win-win for our community and for the county to re-purpose already disturbed property that is presently falling into the abandoned category. The Department of Parks actively works with schools so this remedy is quite obtainable. Please seriously consider this alternative location.	Please see the response to comment I37a-2. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No further response is required.

Comment Letter I38: Courtney Norton, November 15, 2021

Comment#	Comment Text	Response
I38-1	Thank you for the opportunity to comment on the proposed Alpine Park Project's (Project) Draft Environmental Impact Report (DEIR). I am a 30+ year resident of Alpine. I grew up playing in Wright's Field Preserve and on the County owned property. The grasslands have shaped who I am today and taught me to love open space. The destruction of this land is simply uncalled for. Once it is gone, it is gone forever. I am disappointed and beyond concerned with how this document was written with complete disregard to the direct impacts this project will have on Wright's Field Preserve.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see MR-2 (Indirect Impacts on Wright's Field).
I38-2	Safe access has not been addressed properly. I am a homeowner in the Alpine Village. My property is 2 miles from the proposed	A DG sidewalk would be implemented on South Grade Road, along the project frontage, for pedestrian access to the project.

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	park via Alpine Boulevard and South Grade Road. For me to access the proposed park by foot, I would be putting my life at risk by walking on South Grade to get there. My other option is to walk to Olivewood Lane (a private road with signs stating "No access to Wright's Field"). So trespass, and then hike through Wright's Field to the park. The DEIR fails to mitigate for the increased foot traffic through Wright's Field Preserve (DEIR 4.16-7). How is this equitable for the community of Alpine?	In addition, a striped crossing would be implemented across South Grade Road for pedestrian, equestrian, and bicycle users. Please see MR-7 (Transportation and Safety) for additional information on project access. Discussion of additional indirect impacts from increased foot traffic and human activity is included in Section 4.17, *Transportation and Circulation*, of the Draft EIR and was expanded in Section 4.17, *Transportation and Circulation*, of the RS-Draft EIR.
I38-3	Traffic concerns with regards to fire evacuation: I've lived through countless fires that have ravaged the community of Alpine. A majority of the fires have directly affected the community of Palo Verde Ranch. The neighbors in that community have two ways out: on Via Viejas and then in times of emergency via a gate that is opened into Rancho Palo Verde Estates. The lack of analysis (DEIR 4.20.5) in the DEIR on the impacts the proposed park will have on this community are neglectful and dismissive. How can the San Diego Department Parks and Recreations (DPR) claim there is no significant impacts?	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.
I38-4	The community has requested, time and time again, a passive park alternative with off-site amenities. DPR failed to include this reasonable alternative (DEIR 6.1). Please include the analysis of a passive park with off-site amenities.	The commenter's preference for a passive park alternative is noted for the record. Please see MR-10 (Passive Park Alternative) for additional information.
I38-5	Please make sure that I receive all updates and meeting notices on this project, along with notices of any additional opportunity to review related plans that were not yet released for public comment that relate to the Project at courtney.norton88@gmail.com and the mailing address above. Thank you for taking my comments.	The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I39: Kyle Ogle & Dominique Norton, November 15, 2021

Comment#	Comment Text	Response
I39-1	Thank you for the opportunity to comment on the proposed Alpine Park Project's (Project) Draft Environmental Impact	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San

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	Report (DEIR). We are disappointed to read that many of the issues and concerns that we raised in our Notice of Preparation Comment Letters dated 4/3/2021 on page 169-170 and April 7, 2021 on page 207-210 were not incorporated in the DEIR. I (Dominique) grew up in Alpine and spent countless hours at the proposed park site and Wright's Field MSCP Preserve (Wright's Field) as a child which fostered my love and appreciation for our environment and shaped the person that I am today. When I was a child, I stood in front of the San Diego County Board of Supervisors (BOS) and pleaded for the protection of what is now known as Wright's Field. I remember vividly attending the meeting in person with my handmade posterboard that said, "Save the Field, protect it for our future generations". Here I am years later, pleading for the continued protection of this land for my children, and our future generations. Our family purchased our home in late 2020 at the corner of South Grade and Calle de Compadre. We moved our family from Santa Clara to Alpine to escape busy San Fransisco Bay Area city life. We were drawn to the open ruralness that Alpine has to offer. Our property offers everything we were seeking in a new home: quiet open space, beautiful sunsets, and dark skies to enjoy the stars with less traffic, crime, noise and pollution.	Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I39-2	We were aware that the County Department of Parks and Recreation (DPR) had planned to develop a small passive park across the street from our new home. We were hopeful this park would be done in a way that would honor the space and finally protect the resources in perpetuity, which is what we understood the community, Alpine Community Planning Group (ACPG) supported (picnic tables, small parking lot, trashcans), and previous Supervisor Diane Jacob had promised the community when the land was purchased in 2019. We are extremely unhappy to learn that the County did an about-face and developed a 25-acre active recreation park to "meet their matrix" while utterly disregarding what the community has wanted for decades. We are equally sad to learn that DPR counts active and passive acres equally to meet their metrics yet choice	The commenter's preference for a passive park alternative is noted for the record. A passive park alternative has been analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR. Please see MR-10 (Passive Park Alternative) for additional information.

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	to move forward with the plan to develop an active park despite DPR mission to "...enhance the quality of life in San Diego County by providing exceptional parks and recreation experiences and preserving significant natural resources."	
I39-3	The Project site is already enjoyed daily and offers beneficial use to the public. It is 96.6 acres of open space, made up of native grasslands, Engleman oak woodlands, and coastal sage scrub, and is home to listed species and species of special concern. This is already a location we can share with our children in its current state and use it as a teachable moment that they too should learn to respect our resources and fight for the protection of our environment. If not, what world are we leaving them?	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I39-4	We know now, more than ever, as a result of the COVID-19 pandemic that the access to open and green space is vital to our physical and mental health, and wellbeing. Peer reviewed literature supports that access to passive open space has higher value than active parks with amenities, especially if the amenities are not maintained. Alpine could continue to benefit from the use of the Project site as a passive park with minimal cost to the County while "preserving significant natural resources." Why do we have to destroy our natural resources to construct a manmade park when literature has clearly stated passive parks offer higher value for human's physical and mental health?	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I39-5	The County has a history of not maintaining their existing facilities and regularly fails to construct and retrofit their facilities in compliance with the American Disability Act (ADA). How can Alpine expect that the Project site would be managed any differently than other parks throughout the County that have fallen to disrepair once the parks construction is completed? The specific design of the park is unclear. Does the Project include an ADA accessible playground?	The project includes ADA-compliant parking spaces near the primary entrance and administrative building and in the eastern portion of the site along South Grade Road. In addition, the project would include ADA features throughout the park, including accessible picnic tables, restrooms, pathways, and rubberized playground surfaces. No changes to the Draft EIR are needed.
I39-6	We are shocked that a public agency would be more interested in spending $28 million on an active Regional Sports Complex over preserving the Project site, which would result in minimal cost to the County and further DPR's mission. It is discouraging	The commenter's preference for a passive park alternative is noted for the record. As required under the County's MSCP Subarea Plan, an open space area that is approximately 70 acres will be managed in perpetuity in accordance with the RMP. This

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	that the County would choose to develop this land over creating a passive park to honor, respect, and maintain the integrity of this space, especially considering the County's priority to preserve open space and develop a sound Climate Action Plan, and Governor Newsom's 30 by 30 initiative. How will this Project be in alignment with relevant federal, state, and local initiatives?	plan will outline managements activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Please also see MR-10 (Passive Park Alternative) and MR-12 (Parks Master Plan). Additionally, please see Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR for a discussion on the project's consistency with regulations that govern GHG emissions.
I39-7	DPR has told the community on numerous occasions that the proposed park is a local park intended for the local community of Alpine. However, according to the DEIR the park is designed to be a Regional Park (DEIR page ES-6). This became incredibly clear at the October 20, 2021 BOS meeting when DPR requested approval for a resolution to apply for Proposition (Prop) 68 Statewide Regional Park Grant Program funding for use of the construction of a Regional Park in Alpine. Per the material provided for this agenda item (https://bosagenda.sandiegocounty.gov/cob/cosd/cob/doc?id=0901127e80db09ba): Page 1 states to be eligible for Prop 68 funding, the proposal must be a "Regional Park" which attracts "visitors from at least a 20-mile radius or a county-wide population". Page 4 states "DPR is applying for grant funds to support the construction of...parks that attract visitors county-wide". There is NO denying this is a destination park expected to attract 500 daily visitors but how will this park then comply with the greenhouse gas (GHG) reduction initiatives to reach our climate goals if it is to attract visitors regionwide which are not adequately analyzed in the DEIR? How will this park comply with San Diego Association of Governments' (SANDAG) Regional Plan, expected to be adopted in December 2021, to increase the use of public transit when no public transit exists to this site?	The project would develop a local community park and the park would be funded by County General Funds. Please see Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR for a discussion of the project's consistency with regulations that target GHG emission reductions. The discussion of public transit is only included in the report for informational purposes. The traffic study does not rely on public transit for any trip reduction credit. Additionally, pedestrian facilities and potential transit stop locations along the project frontage are to be further evaluated and discussed with County staff. Please see MR-7 (Transportation and Safety) for additional information on roadway improvements at the project frontage. No changes to the Draft EIR are needed.
I39-8	Page 1 states Prop 68 funding is "to support projects that enhance environmental and social equity" however without safe	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on

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	access how will this be achieved? The DEIR fails to address traffic and safe access issues. Rather, cumulative impacts of efforts currently underway to improve safe access to the park were not analyzed and mitigated for in the DEIR. These include the Alpine Loop Proposal being driven by ACPG and Department of Public Works, and the planned improvements to the trails on Wright's Field being pursued by Back Country Land Trust under a SANDAG grant – both of which were stated to improve access to the Project site at recent ACPG meetings. South Grade Road and Calle de Compadres are currently being resurfaced by Department of Public Works. In addition, at a September 2, 2021, meeting held by DPR, DPR stated safe access from the Village (Alpine's town center) is available via Olivewood Lane and stated on multiple occasions that Olivewood Lane is a public road. Olivewood Lane is NOT public, it is a private lane, thus does not offer safe access from the Village. South Grade Road does not offer sidewalks/pedestrian access or bike lanes and unfortunately has seen too many deaths and hit-and-run accidents. How can the County ensure that this project will "enhance environmental and social equity" when it is destroying highly sensitive biological resources while not offering safe access to the park? Should have the abovementioned improvements been included in the DEIR to assess the impacts and necessary mitigation?	transportation impacts, roadway operation and safety, project access, and roadway improvements. The project would provide an MWSC for the project's driveway and South Grade Road and would include a striped crossing feature for pedestrian, equestrian, and bicycle users. A DG walkway would also be implemented throughout the project site. No changes to the Draft EIR are needed.
I39-9	Page 2 states "the recreational improvements at Alpine Park...will be located in...unincorporated communities that do not currently have a County park". However, Alpine has access to existing County parks, including Flinn Springs County Park, 10 miles from the center of Alpine and Pine Valley County Park, 17 miles from the center of Alpine. County of San Diego's Parks Master Plan (December 2020, page 144) includes the level of service calculations for the Alpine Community Plan Area which states, "due to its proximity to seven large county parks, Alpine's regional park standard and goal is not only met, but exceeded by 1,339.71 and 1,249.64 acres, respectively." How can the County support the development of an additional Regional Park given the metrics included in their own Master Plan? Why would the	The County's Parks Master Plan found the Alpine CPA, where the project site is located, to have a deficit of local parkland but much capacity for park acquisition and development. Please see MR-10 (Passive Park Alternative) and MR-12 (Parks Master Plan) for more information. No changes to the Draft EIR are needed.

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	County deceive to the community on the scope and intent of the proposal? How can the County justify wasting public resources to build a redundant facility? DPR counts active park and passive park acres equally to meet their matrix of park land to people. Why has DPR not used an opportunity at this Project site to increase local park acres, which is deficient according to their Parks Master Plan, by using the site as a passive park intended for use by the local community?	
I39-10	The County Parks Master Plan also states that Alpine is an aging population which does not support the need the Project. In addition, SANDAG's draft revised Regional Plan Table F.3: Total Housing Units by Jurisdiction https://sdforward.com/docs/defaultsource/2021-regional-plan/appendix-f---reg-growth-forecast-and-lu-scenario.pdf?sfvrsn=d144fd65_2 (expected to be adopted in December 2021) does not show population growth for unincorporated areas of San Diego County after 2035. Future populations projections do not support or justify the scope of the Project. DPR has stated on multiple occasions this is a park for the future population of Alpine. On what grounds is DPR using to justify this claim?	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. Moreover, SANDAG's Series 13 projections were used instead of Series 14 projections in order to assume the greatest level of future development. Generally, SANDAG Series 14 projects a much lower growth in the Alpine CPA. For example, SANDAG Series 13 projects that the population growth for the Alpine CPA would be 23,841 residents by the year 2050 (SANDAG 2013), whereas Series 14 only projects 17,122 residents (SANDAG 2022a). No changes to the Draft EIR are needed.
I39-11	Alpine does not need a Regional Park, nor does it need a Sports Complex. Per the State Park's Prop 68 "Final Application Guide for the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access for All Act of 2018 Regional Park Program (RPP)" (page 5, https://www.parks.ca.gov/pages/1008/files/Final_Regional_Park_Program_Application_Guide_10.29.20.pdf), a "Regional Sports Complex" is defined as "athletic fields (...baseball...), athletic courts/course (basketball, "futsal", tennis, pickleball, golf, etc.)". How can a public agency mislead the public on the true intent of the Project, perhaps influenced by this funding source and at the same time deny the Project is a Sports Complex that will attract regional visitors?	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts and how these efforts informed the design of the project. No changes to the Draft EIR are needed.
I39-12	Renovations to the existing facilities at Joan MacQueen Middle School sport amenities under Joint Exercise of Powers Agreement (JEPA) using Park Land Dedication Ordinance (PLDO) is going before the BOS on November 17, 2021, which	Analysis of Alternative 5 – Passive Park Alternative is included in Chapter 6, *Alternatives*, of the RS-Draft EIR. Please see MR-10 (Passive Park Alternative) for additional details. No changes to the Draft EIR are needed.

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	would duplicate many of the amenities included in the Project. Numerous letters included in the DEIR's appendix were submitted by members of the community during the Notice of Preparation public comment period, many of which asked DPR to include an alternative in the DEIR which would provide a passive park at the Project site and offer off-site amenities at other locations or to improve existing faculties. DPR failed to include this alternative and quickly dismissed "mini-parks" in the DEIR as a feasible alternative. DPR has told the community on countless occasions that they want their own standalone County facility at this location. DPR has also stated that they do not enter into agreement with other property owners to do exactly what they are proposing at Joan MacQueen Middle School, and at other facilities in Alpine in the past. Why was the passive park with off-site amenities alternative that the public requested to be analyzed dismissed and not adequately included and analyzed in the DEIR? Why is DPR willing to pursue a JEPA and PLDO fund for Joan MacQueen Middle School improvements but not willing use these to locate and develop other sites which would better serve the community while not destroying the resources? How can the County justify the use of public funds to improve amenities at Joan MacQueen Middle School while duplicating amenities included in the Project?	
I39-13	Page 4 states that the park is at the intersect of South Grade and Via Viejas (should be Calle de Compadres where the main entrance is located). It further says that "design of the park is based on input received during four public outreach meetings conducted between May 2019 and January 2021". Page 5 states, "if awarded, the grant funding would be applied to the project in order to realize the community's vision". The community learned as a result of the BOS October 20, 2021 meeting that DPR requested a resolution to apply for Proposition 68 funding to construct the Alpine Park Phase I and the Project would be constructed in three phases. However, the DEIR does not define phases for construction but rather states "construction would occur in one phase over 16 months and is anticipated to begin in fall 2022" (DEIR page 3-5). Why does DPR continues to present	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts and how these efforts informed the design of the project. No changes to the Draft EIR are needed.

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	phased construction in agenda items presented to BOS when the DEIR does not define the Project in the same way? Why does DPR continue to mislead decisionmakers and the public with the specifics related to the Project	
I39-14	The agenda material stated the design "is based on input received during four public outreach meetings". The agenda material also states, "if awarded, the grant funding would be applied to the project...to realize the community's vision". Why does DPR continue to ignore the "community's vision" and dismissed all opposition received to date?	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts and how these efforts informed the design of the project. No changes to the Draft EIR are needed.
I39-15	From February 2019 when the BOS approved the acquisition of this property until late summer 2020, Alpine had been led to believe that the park at this location would be minimal in size and passive in nature. No one imagined the park would balloon up to 25-acres nor that it would be a Regional Sports Complex Active Park. In late 2019, DPR presented the proposed scope of the park for the first time to the public. Over the 2021 calendar year, we attempted to engage with the Alpine Community Planning Group at monthly meetings to express concerns with the scope and amenities included in the prosed park which were dismissed, and one case ACPG members called the community NIMBYs and ungrateful for the park that the ACPG had been working to develop over the last 20 years. We tried to engage with DPR to express concerns at numerous meetings and on one occasion was told by DPR staff that this Project is a "done-deal and to get over it." DPR has not been receipted of our concerns, as directly affected adjacent neighbors to the Project site. Why has our concerns at multiple public meetings and voiced in our Notice of Preparation comment letter been dismissed? Why were the true impacts to neighbors not adequately analyzed and mitigated in the DEIR?	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts. No changes to the Draft EIR are needed.
I39-16	The DEIR states the "...County DPR also held a virtual scoping meeting on March 30, 2021" (DEIR page 1-3) that was posted as a YouTube video which did not offer a forum for public interaction. The DEIR states "Comments received...during the public scoping meeting were used to determine the scope of this	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts. Responses to the comments posted on the YouTube video of the scoping meeting are provided in the response to comment I39-48 below. No changes to the Draft EIR are needed.

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	Draft EIR. The comments are summarized in Table 1-2" (DEIR page 1-3). To clarify, the comments that were posted to the YouTube video were not incorporated in the DEIR Table 1-2 (copy of comments posted to the YouTube video are included following this letter.) Is a recorded Scoping Meeting posted to YouTube as part of the Notice of Preparation without public involvement in compliance with requirements to hold a scoping meeting under CEQA? How can the public trust that our efforts to participate in this public process was truly taken into consideration to "determine the scope of" the DEIR?	
I39-17	The link included in the "Notice of Availability of a Draft Environmental Impact Report for the Alpine Park Project" dated September 30, 2021 and available at https://www.sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/Alpine%20County%20Park_Draft%20EIR%20Notice%20of%20Availability%20a nd%20Contact%20Information.pdf includes a non-functioning link. A correction email was sent out following this error, but the notice that was mailed was not resent. How can a public agency expect the public to navigate this seemingly overwhelming CEQA process if it does not provide accurate information to the public on how to participate in the process?	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts. No changes to the Draft EIR are needed.
I39-18	Generally, the DEIR is written very unprofessionally with numerous inconsistent uses of naming (i.e. Backcounty Land Trust vs Back Country Land Trust) throughout the document. My name is also (Dominique Norton) spelled wrong in the DEIR section that includes comments provided during the NOP. The DEIR is written so vaguely in areas that it is irresponsible to expect the public to be informed as to the actual proposal of the Project and to provide thoughtful comments.	This comment is acknowledged. Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of project implementation in relation to environmental impacts and existing policies. The Draft EIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development. This approach avoids underestimating potential impacts. No changes to the Draft EIR are needed.
I39-19	For example, the document does not define if septic tanks and leach fields will be used on site or if a connection to the sewer line would be constructed. The DEIR states "for utilities, the project would either connect to the existing sewer system or include a septic system to serve the restroom facilities, administration facility/ranger station, and volunteer pad...it will connect to the existing sewer line within Tavern Road, west of	Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR for information on the septic system to serve the facilities and wastewater treatment. Also see the response to comment O8-80. No changes to the Draft EIR are needed.

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	the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard" (DEIR page 3-3). The DEIR is too vaguely written to understand the proposed option to manage waste and does not define how the use of onsite septic tanks and leach fields will not affect neighboring properties or if it would pollute our groundwater. How will smell from the regular pumping of waste from the tanks be mitigated to not affect neighboring properties or visitors to the Project? As noted in our NOP comment letter, these concerns needed to be analyzed in the DEIR which were not adequately addressed. Impacts and mitigation measures for the construction of the sewer line are not defined in the DEIR. Why was the inclusion of the management of waste so vaguely included in the DEIR? How can the public comment on the impacts and mitigation measures if they are not adequately included in the DEIR?	
I39-20	The DEIR does not present various management plans that it will rely on to mitigate for the Project's impacts. For example, the Habitat Conservation Plan (HCP) is not drafted nor has the Incidental Take Permit for Quino checkerspot butterfly been obtained from the US Fish and Wildlife Serve and included for review at during the DEIR comment period. How can the community be ensured that impacts are being fully address without inclusion of the mitigation measures in the HCP as part of the DEIR? Is the omission of these Plans considered deferred mitigation and is that allowed under CEQA? We request to be notified of any public comment period for any and all supporting plans that relate to the Project.	The County is working with the wildlife agencies regarding the Habitat Conservation Plan and ITP for QCB. Mitigation implementation and success for QCB would be reviewed by the appropriate agencies to deem success. In addition, **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** provides measures to reduce impacts on QCB. An RMP will be developed prior to formalizing trails and before opening the open space to the public. This plan will outline management activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Please see MR-4 (Natural Resource Mitigation) and **APM-BIO-1: Establishment of the Open Space Preserve** for further details. No changes to the Draft EIR are needed.
I39-21	The DEIR claims that "The project is consistent with the Alpine Community Plan..." (DEIR page 1-3). This is an inaccurate	The results of the analysis (presented in Section 4.13, *Noise and Vibration*, of the Draft EIR) indicate that project-related

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	statement for the following reasons (elements and polices that the DEIR is inconsistent with are noted below, note the policies and recommendation included are 7 of 17 directly related to the Project and reflect their numbering included in the Alpine Community Plan): 1. Element 6 NOISE a. GOAL – To provide standards by which the community may determine when noise levels are in excess of what may be considered as damaging and not desirable b. POLICIES AND RECOMMENDATIONS i. Encourage land use and circulation patterns that will minimize noise in residential neighborhoods. c. DEIR is inconsistent with Element 6: i. The Project will create noise levels that are in excess of what is "considered as damaging and not desirable" in that the proposed park will not "minimize noise in residential neighborhoods." The DEIR includes some attempt to mitigate for the increased noise impacts by constructing a berm around the Project, but the berm does not wrap around the entire footprint of the Project. Nor will it mitigate for the way noise travels in the vicinity of the Project due to the surrounding hillsides which amplify any noise generated in the area. The residential neighborhoods adjacent to the Project will be directly impacted and thus the mitigations included in the DEIR are not adequate to not be "considered as damaging and not desirable." How can DPR ensure that neighbors will not be impacted by the increased noise caused by the Project?	operational noise would increase the ambient noise level by no more than 3 dB, which would be under the 5-dB significance threshold and would not require mitigation. While the analysis indicates that an increase in noise may occur, any increase would comply with applicable thresholds laid out in the San Diego County Code of Regulatory Ordinances and Alpine Park Plan. Please also refer to MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I39-22	ii. The operating hours included in the DEIR is unclear. The DEIR states "The project would be open to the public from sunrise to sunset" (DEIR pages ES-2, 1-1, 3-5) but then states that "the only exception is for official use of the announcer's PA systems or other devices required for proper operation of the intended and approved activities...End all onsite events no later than 10:00 p.m." (DEIR page 4.13-20). Other existing Regional Parks in the area operate from 9:30 am to half an hour before sunset at Pine Valley County Park (https://www.sdparks.org/content/	Please refer to MR-13 (Noise and Lighting). As stated there, **MM-NOI-3: Set Operational Limits and Restrictions** does not allow for a PA system unless this has been approved by a specific permit (e.g., conditional use permit, special event permit). The project would not include the use of a PA system otherwise. No changes to the Draft EIR are needed.

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	sdparks/en/parkpages/PineValley.html) or from 93–sunset at Flinn Spring County Park (https://www.sdparks.org/content/sdparks/en/parkpages/FlinnSprings.html). The current mitigation included to reduce effects of noise are not adequately mitigated. How will the County modify the operations to mitigate noise impacts to residential neighborhoods?	
I39-23	iii. The DEIR states "the vegetated berm would be of varying height, but would generally build in height from the north to the south in order to obscure direct reviews of the parking lot of users of South Grade Road and adjacent residents" (DEIR page 3-2). However, the berm starts just south of the dog parks which is located adjacent to South Grade Road and directly across the street from an abutting property (our home). The berm therefore does not fulfill the intended purpose to mitigate noise and site from the neighbors directly across the street. How will noise be mitigated to reduce impacts to the neighborhoods surrounding the Project?	Please see the response to comment I33-3, above, and MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I39-24	iv. As noted in our NOP letter "We did not choose to live next to heavy machinery needed for construction, nor did we choose to live next to constant traffic, idling cars at the proposed four-way stop, increased number of people's voices, endless dogs barking, car alarms going off, amplified music at events held at the pavilion, wheels at the bike and skate park, and all conducted over an abundance of additional concrete needed to complete the park..." The DEIR has failed to address the concerns provided in our NOP letter. What will the noise impacts be during construction to our family and our neighbors and how could these be better mitigated? How will DPR mitigate for the noise that will affect our home (see Figure 4.13-2) which is anticipated at 60-65 decibels? Will we be subjected to noise impacts from 7 am – 7 pm or as late as 10 pm in some cases? How can mitigations be improved to reduce the impacts to the surrounding neighborhoods? How will impacts to the increased noise generated by the Project be mitigated to mitigate for the impacts on local wildlife that rely on the property and Wright's Field?	Please see the response to comment I33-3, above, and MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.

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I39-25	2. Element 9 CONSERVATION a. GOAL – Promote the well-planned management of all valuable resources, natural and man-made, and prevent the destruction and wasteful exploitation of natural resources, where feasible. b. POLICIES AND RECOMMENDATIONS i. Encourage the protection and conservation of unique resources in the Alpine Planning Area. ii. Important plant, animal...water, cultural and aesthetic resources in the Alpine Plan area shall be protected through utilization of the Resource Conservation Area designations and appropriate land usage. iii. Agencies regulating environmental reports and analyses required by the California Environmental Quality Act (CEQA) may require supplemental studies for projects with land located in RCAs, if necessary. vi. Utilize all measures to preserve rare, threatened, or endangered plant life; including on-site protection through open space easement... vii. Protect the rare Engleman Oak, wherever possible. viii. Promote the planting of trees with an emphasis on species with maximum respiration rates... ix. In reviewing discretionary permits, special attention shall be given to oak trees and boulder outcroppings. xiv. Protect surface and groundwater supplies from pollution. xvii. Encourage the use of reclaimed water for agriculture, irrigation, recreation, industry, and other appropriate usages. xviii. Conserve water and biological resources of El Capitan Reservoir, Loveland Reservoir, and other water bodies and streams by utilization of	This comment includes goals, policies, and recommendations from Element 9, Conservation, of the Alpine Community Plan. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I39-26	c. DEIR is inconsistent with Element 9: i. The Project is inconsistent with this element and will cause "destruction and wasteful exploitation of natural resources".	Table 4.11-1 in Section 4.11, *Land Use and Planning*, of the Draft EIR discusses the project's consistency with the County of San Diego General Plan and the Alpine Community Plan, including Chapter 9, Conservation. Additionally, the project involves conservation of open space, thereby preserving sensitive lands

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	ii. The DEIR states that "the Alpine Community Plan designates Resource Conservation Areas (RCAs), which are localities identified as worthy of special efforts to protect important natural resources" (DEIR page 4-1.2). How can the Project be considered to "protect important natural resources" when over 60% of the native grassland is planned to be graded?	and species in perpetuity as detailed in the RMP, which outlines management activities that would enhance and preserve the affected sensitive natural communities for the Alpine Park Preserve. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space. Please see MR-3 (Native Grassland Impacts), MR-4 (Natural Resource Mitigation), and **MM-BIO-10: Native Grassland Mitigation** for additional details. No changes to the Draft EIR are needed.
I39-27	iii. The DEIR states "A dog park would be included near the north entrance of the park, adjacent to South Grade Road" (DEIR page 3-3). There are huge safety issues with the dog park's location next to South Grade which could lead to deaths of dogs or the public if a dog gets off leash and runs in to traffic (this was the cause of a previous tragedy at this exact location). Research shows health and safety issues are associated with dog parks. How will the rules for the dog park be enforced? How will the neighbors and the Project site be protected from run off to "protect surface and groundwater supplies from pollution?".	Please see the responses to comments I33-5 and I37-10. As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, implementation of the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Project components including stormwater retention basins, landscaped areas, and berms would infiltrate and capture runoff. No changes to the Draft EIR are needed.
I39-28	iv. The DIER states the Project will "Maintain Areas of Native Vegetation Along the Project Boundaries. All boundaries of the Alpine Park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the County Park. Drought-tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, on the western boundary along Wright's Field Preserve, and on the northern boundary." How will the Project's landscaping comply with the Alpine Community Plan and the County's new policy related to the use of natives in landscaping?	The County of San Diego Native Landscaping Program, approved by the Board of Supervisors on December 14, 2022, is a voluntary program to increase the use of native plants in landscaping across the region. However, as stated in **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries**, drought-tolerant and native plants would be located along the project boundaries. The project landscaping would also use drought-tolerant plants. In addition, prior to construction, the project landscaping will require approval from a licensed Landscape Architect. The project is required to comply with the Alpine Community Plan and County regulations in regard to landscaping. No changes to the Draft EIR are needed.
I39-29	v. The DEIR states that the "remaining 70 acres for open space/preserve" but how can the impacts and mitigation be evaluated if the Habitat Conservation Plan has not been developed? How will the impacts of the Project be mitigated to	The County has been coordinating directly with applicable agencies to develop the Habitat Conservation Plan, which is required prior to construction. Mitigation and success of implementation of the Habitat Conservation Plan is reviewed and deemed by the agencies. An RMP will be developed prior to

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	no cause spillover effect to the Project's preserve or Wright's Field?	formalizing trails and before opening the open space to the public. See MR-4 (Natural Resource Mitigation) and **APM-BIO-1: Establishment of the Open Space Preserve** for further details. See MR-2 (Indirect Impacts on Wright's Field). Impacts from the project would occur approximately 600 to 800 feet from the eastern edge of Wright's Field with County open space in between, as part of the project. At this distance, indirect impacts from both construction and operation of the active park would be less than significant with mitigation (i.e., through noise or dust mitigation), less than significant (e.g., only minor impacts on how wildlife uses the open space areas adjacent to the park), or no impact (e.g., no night lighting). No changes to the Draft EIR are needed.
I39-30	vi. The DEIR states that water "would be provided by Padre Dam Municipal Water District." (DEIR page 3-4) The use of potable water for landscaping is not in compliance with the Alpine Community Plan encouraged use of "grey water for irrigation." How can a public agency advocate for such an irresponsible misuse of this finite resources as the state enters another drought year and reduction of use has been required statewide? vii. As noted in our NOP comment letter "our world is in a climate crisis and water is a finite resource. The proposed park includes water-guzzling manicured turf and landscaping. As new property owners, we are considering when to drill a well for our use and would then share an aquifer with the park. We are concerned that we will lose our well water if the park starts pumping." How will DPR ensure that the aquifer is not affected by toxins produced at the Project? viii. "Water demand is anticipated to be approximately 16,471,273 gallons per year." (DEIR page 3-4) Who is responsible for covering the cost of this bill?	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the water supply and service boundary of PDMWD. Also see the response to comment O8-58. In addition, subsequent steps will be taken to ensure that the aquifer is not affected by toxins produced at the project site. Please also refer to MR-15 (Water and Wastewater) for more information. No changes to the Draft EIR are needed.
I39-31	ix. The Alpine Community Plan states the use of herbicides should be prohibited "...in the Alpine Planning Area, particularly in the proximity of El Capitan and Loveland Reservoirs and their tributaries." How will the use of herbicides and pesticides	Stormwater retention basins would be located throughout the park to manage and treat stormwater and reduce polluted stormwater runoff from being conveyed into receiving waters. Additionally, the project would be required to adhere to the County's Jurisdictional Runoff Management Plan, *BMP Design*

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	needed for landscaping be managed as to not run off into local neighborhoods, on to the Project's preserve or Wright's Field?	*Manual*, *Low-Impact Development (LID) Handbook*, and Watershed Protection, Stormwater Management, and Discharge Control Ordinance, which would ensure that pollutant discharges and runoff flows from development are reduced to the maximum extent practicable and that receiving water quality objectives are not violated throughout the life of the project. Please see Section 4.10, *Hydrology and Water Quality*, of the Draft EIR for more information. No changes to the Draft EIR are needed.
I39-32	x. The Alpine Community Plan states "support strict controls over air pollutants" yet the DEIR anticipates an increase of 500 people with 480 added daily trips (DEIR page 4.17-7) resulting in increased emissions from regionwide visitations. The DEIR states "Climate data from the Alpine monitoring station (COOP 040136) was used to characterize the varying climate conditions near the project site" (DEIR page 4.3-2). How far away is this site and is it appropriate to used for the Project? The DEIR goes on to state "The ambient monitoring station closest to the project site is the Alpine station (CARB 80128), which is approximately 1.5 miles southeast of the project site. The pollutants monitored at the Alpine station are O3 and NO2. Monitoring values for CO, PM10, and PM2.5 were obtained from the next closest monitoring station, which is the El CajonLexington Elementary School located approximately 11 miles west of the project site" (DEIR page 4.3-6) Ozone, respirable particulate matter, and fine particulate matter are classified by the state as "nonattainment". Ozone is the only pollutant recorded at the CARB 80128 site with respirable particulate matter, and fine particulate matter being recorded at the El Cajon-Lexington Elementary School location 11 miles away (note that the CARB identification number was not provided for this site). How reliable is the data from the sensor that is 11 miles away from the Project? Can DPR collect data on site or at adjacent properties to more accurately provide a baseline prior to construction and operations which will increase the release of pollutants? The DEIR fails to "support strict controls over air pollutants" with	The air quality data from the CARB monitoring station are consistent with industry best practices. Please see the response to comment O8-61 for more information. As discussed on page 4.3-24, the construction activities would be temporary in nature and are expected to occur sporadically throughout the construction duration, which is much shorter than the assumed 70-year exposure period used to estimate lifetime cancer risks. Additionally, development associated with the project would occur throughout the entire approximately 25 acres of the active park and would not be concentrated along the project boundary for an extended period. Once construction activities have ceased, so too would the diesel particulate matter emission sources. Overall, exposure to construction emissions would be nominal. Therefore, the project's localized emissions would not affect nearby residents. No changes to the Draft EIR are needed.

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	xi. The DEIR continues on to state, "The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure." (DEIR page 4.3- 3) And states "The EPA (2002) has determined that diesel exhaust is "likely to be carcinogenic to humans by inhalation" (DEIR page 4.3-5) "The closest residences are immediately adjacent to the northeast and south of the project site, across South Grade Road" (4.3-8). How long is duration of exposure critical for residents adjacent to the Project, especially considering that residents are medically fragile children and an asthmatic? How can DPR ensure that the health and wellbeing of all residents in the surrounding neighborhoods?	
I39-33	xii. As noted in our NOP letter "Alpine is a dark sky town. The current proposal includes safety lighting along with light for the volunteer housing. When asked, County Parks stated that ball field lighting is not currently included in this proposal but if that is something Alpine wants it can be incorporated. There will be motion sensor lights that will undoubtedly go off all night long as a result of the active wildlife on the property (owls, coyotes, mountain lions, bobcats, etc.) This light will destroy the dark sky." The DEIR states "All permanent exterior security lighting would be installed such that lamps and reflectors are not visible from beyond the project site" (DEIR page 3-3); however, if the berm is not built fully around the active park, the lighting will be visible by neighbors on the northeastern side. In addition, the times noted in relation to noise states that noise can occur as late as 7 pm or under special circumstances as late as 10 pm. How can the DEIR claim the Project will " preserve the dark night sky characteristics of Alpine" which activities could continue well after sunset? How will the lighting be beter mitigated to reduce impacts to the dark night sky community?	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I39-34	3. Element 10 OPEN SPACE a. GOAL – Provide a system of open space that preserves the unique natural elements of the community, retains and extends areas of open space that are recognized as valuable for	This comment includes goals, policies, and recommendations from Element 10, Open Space, of the Alpine Community Plan. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical

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	conservation of resources, open spaces uses that promote public health and safety. Open space areas...that harmonize with and help integrate conservation and recreation components, creating a well balanced community of natural plant and animal habitat and humans alike. b. Findings i. ...Open space is an outstanding characteristic of Alpine as a community and, along with the uses and pleasures it affords, comprises the "rural atmosphere" that Alpine residents wish to preserve...The citizens of Alpine appreciate the preservation of the natural features of the land and historical landmarks as extremely important. Alpine is unique in many respects and many opportunities remain to preserve the topography, major streambeds, ridgelines, and historical sites of our area...The Resource Protection Ordinance is intended to protect...natural and unique formations. Special care should be taken to maintain open space corridors that connect larger permanent open space uses, such as parks. c. POLICIES AND RECOMMENDATIONS i. Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest and nearby lakes and wildlife preservation areas. iii. Incorporate publicly-owned land into a functional...open space system, wherever feasible. viii. Encourage the consolidation of open space easements to preserve resources lands owned by public agencies or in open space areas. xi. Enhance health and safety and conserve natural resources through the preservation of open space. xii. Provide recreational opportunities through the preservation of open space areas. xiii. Preserve and encourage publicly and privately-owned open space easements.	environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.

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	xiv. Explore all funding sources for acquisition, upkeep, and protection of open space/recreation preserves.	
I39-35	b. DEIR is inconsistent with Element 10: i. The Project will fragment the existing wildlife corridor that allows for the migration and movement of native species from Cleveland National Forest to MSCP lands. Why was the property not preserved as a passive open space area that would have "Provide[d] recreational opportunities?" ii. Why was the Project not designed as a passive park and thus an extension of Wright's Field and Findel Ranch to create a "functional...open space system" which would have "enhance[d] health and safety and conserve natural resources"?	Section 4.4, *Biological Resources*, of the RS-Draft EIR states that, as required under the County's MSCP Subarea Plan, open space will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Please see MR-4 (Natural Resource Mitigation) and **APM-BIO-1: Establishment of the Open Space Preserve** for additional details. Please see also MR-6 (Wildlife Corridors) for additional details on how the project could affect wildlife connectivity and corridors. The commenter's preference for a passive park alternative is noted for the record.
I39-36	iii. Why wasn't the Prop 68 funding pursued to the "upkeep, and protection of open space/recreation preserves"?	The project is funded by County General Funds. No changes to the Draft EIR are needed.
I39-37	4. Element 11 RECREATION a. GOAL – 1. A balanced system of both natural and improved parks with recreational facilities and services that incorporate outstanding natural features for recreational opportunities, enrich the lives of Alpine residents, and meet the needs of the community. 2. Recreational uses that are compatible and do not interfere with the safety and tranquility of private residents. b. POLICIES AND RECOMMENDATIONS i. Establish priorities and encourage the early identification and acquisition of local park sites in order to minimize public costs. ii. Acquire parkland to develop neighborhood parks to the extent that funds are available. v. Prior to the expenditure of Park Lands Dedication Ordinance (PLDO) funds of local park development in the Alpine Planning Area, a funding agency, a community services district, or other	This comment includes goals, policies, and recommendations from Element 11, Recreation, of the Alpine Community Plan. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.

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	taxing agency or nonprofit organization must be identified for local park maintenance and operation services. vi. Development of local park and recreation facilities will continue to be coordinated with local school facilities by establishing joint powers agreements to promote joint development operation and maintenance. viii. Facilitate a local park acquisition program that will use all possible acquisition and funding mechanisms. ix. Encourage the acquisition and development of park lands that will protect outstanding scenic and riparian areas, cultural, historical and biological resources...	
I39-38	a. DEIR is inconsistent with Element 11: i. As noted in our NOP letter, "The project site is adjacent to Wright's Field Preserve, which is managed by BCLT as part of the Multiple Species Conservation Program (MSCP) of the County of San Diego." The County owned property is identified in the MSCP as Pre-Approved Mitigation Area (PAMA) land. i. As discussed at length above, why wasn't the Project designed in a way to meet the noted priorities and recommendations for Element 11?	Please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR and the MSCP Conformance Statement (Appendix D1 to the RS-Draft EIR), which determined that the project is consistent with the MSCP, County of San Diego General Plan, and Alpine Community Plan. The project includes both conservation and management plans that would restore and manage habitat in perpetuity consistent with the County's MSCP. Additionally, Table 4.11-1 in Section 4.11, *Land Use and Planning*, of the Draft EIR includes discussion of the project's consistency with the Alpine Community Plan including Element 11, Recreation. Please also refer to MR-2 (Indirect Impacts on Wright's Field), MR-3 (Native Grassland Impacts), and MR-12 (Parks Master Plan) for additional information. No changes to the Draft EIR are needed.
I39-39	The proposed park currently includes a new four-way stop feeding all traffic into the park at the intersection of Calle de Compadres and South Grade Road (DEIR page 4.17-9), exactly where our home is located. The idling cars at this intersection will increase congestion, noise, and air pollution. South Grade Road is an extremely dangerous two-lane unimproved country road. There have been several people who have lost their lives on this stretch of South Grade Road of which one death occurred	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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	directly abutting my property and the proposed dog park. Why were the impacts not mitigated for in the DEIR?	
I39-40	The County states that there will not be a parking fee to use the proposed park at this time, but there is no guarantee of the future, nor is it specified in the DEIR. Parking onsite would help to reduce street parking, congestion, accidents and fatalities. If a parking fee is instituted, like at many other County parks, patrons will find other locations to park their vehicles to avoid paying the fee. In this situation, it will remain the same with patrons parking on South Grade Road and Calle De Compadres exasperating this major safety issue. The DEIR states that "During operation, 'No Parking' signs may be installed along the shoulder of South Grade Road, if deemed necessary by the County Department of Public Works (DPW) Traffic Division, to prevent potential overflow parking on South Grade Road" (DEIR pages ES-2, 3-5). 'No Parking' signs would be installed along the shoulder of South Grade Road, as deemed necessary by the Department of Public Works." Why is there no mention of "no parking" signs on adjacent neighborhood streets (Calle de Compadres, Nido Aguila, Boulder Oaks Lane, etc). How will overflow parking be mitigated to not impact local neighborhoods?	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would include up to 240 parking spaces. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed.
I39-41	The DEIR states that the Project is "...approximately 1 mile south of the center of the...community of Alpine" (DEIR page ES-2). DPR has stated in public meetings that this is a destination park. DPR made no attempt to improve safe access to the Project. To clarify, the center of Alpine is 2 miles away via Alpine Boulevard and South Grade Road. From the Village, someone could access the Project via Olivewood Lane, private, and via Wright's Field. Why did DPR not account for the impacts of the increased foot traffic and impacts to Wright's Field and provide mitigation for these impacts? The Project will have a spillover effect on Wrigth's Field and will draw exponentially increased usage to Wright's Field. Why is there no mention of impacts or mitigation of these impacts to Wright's Field in Section 4.16?	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Please also see MR-2 (Indirect Impacts on Wright's Field).

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I39-42	"The quality of the visual character is high because it is an undisturbed rural view that complements the semi-rural residential vicinity, and provides an uninterrupted view of open space." (DEIR page 4.1-2) This park will undeniability change the "visual character" from the public right of ways including South Grade but also fails to address impacts of those who view the Project from public right of ways that look down on the property. "Public views of the project site would be available from South Grade Road; the principal public viewer groups would be motorists and pedestrians within the public road right-of-way..." (DEIR page 4.1-3) Why is there no consideration to the impacts to local neighbors and how the Project could modified to mitigated and reduce those impacts? "Sources of glare from operation of the project would be from parked vehicles in the parking lot, and photovoltaic (PV) panels that would be installed in the parking lot mounted on overhead structures to power the outdoor lighting...[or] vehicles parked in the parking lots along the eastern portion of the project could result in glare from sunlight reflecting off the glass windshields" (DEIR page 4.1-15). The DEIR does not address impact of glare from public right of ways and neighbors that look down on the Project site or from South Grade. How can mitigation measures be improved to reduce glare from the Project?	See MR-13 (Noise and Lighting) for more information on lighting impacts. Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR determined that the project would not result in new sources of glare that would substantially affect daytime views and no mitigation measures were required. Additionally, County DPR would install solar photovoltaic panels with anti-reflective coatings, which would reduce glare. No changes to the Draft EIR are required.
I39-43	"In addition, the project would have less than significant impacts related to vehicle miles traveled (VMT), which would be consistent with the goals of Senate Bill (SB) 375 and SANDAG's Regional Plan." 4.3-21) How can the increase if over 500 visitors not result in an increase of VMT, especially considering this is a Regional destination Park?	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I39-44	Our concerns stated in our NOP regarding wildfire were not addressed in the DEIR. Alpine is a in a high fire risk area of the County. As a property owner, it is hard to obtain fire insurance as such. This proposed park would increase the fire risk to all abutting neighbors as a result of increased ignition change (onsite BBQs, increased vehicle traffic, irresponsible disposal of cigarettes). This will result in making it even more difficult to	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks.

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	obtain and/or keep home owners insurance. The DEIR fails to address the impacts of increased traffic to the need to evacuate by those visiting the Project and those living in neighborhoods adjacent to the Project. How can the DEIR be improved to mitigate for these impacts?	
I39-45	On 11/15/2021, I observed a loggerhead shrike on the County owned property. This is a California Species of Special Concern that was not included in the DEIR.	The species mentioned in the comment was not analyzed for occurrence because it is not documented within 5 miles of the project site in the CNDDB. No changes to the Draft EIR are needed.
I39-46	We requested in our NOP letter that a smaller nature-based [passive] park be included as an Alternative in the DEIR. We are very disappointed to see the DEIR does not include a passive park alternative nor does it include the evaluation of off-site amenities. This alternative would create little to no impact to the natural resources. Please include a revision to the DEIR that includes the analysis of a passive park with off-site amenities	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I39-47	Please also make sure that we receive all updates and meeting notices on this project, along with notices of any additional opportunity to review related plans that were not yet released for public comment that relate to the Project at dqnorton@gmail.com and the mailing address above. Thank you for taking our comments.	The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.
I39-48	Public comment copied below that was submitted as part of the Notice of Preparation Scoping Meeting YouTube video; 147 views, March 30, 2021 https://www.youtube.com/watch?v=xyKiPTawDsQ&t=5s Patrick Williams 7 months ago The park area measures 28 acres, not including the apparent off park septic drainage field to the north Frank Landis 7 months ago Please preserve this video in its entirety as part of the public record on this project. Without a Scoping Meeting and paper handouts, there is no other documentary proof that the County tried to meet the CEQA requirement using this video. Please also	The scoping presentation video posted March 30, 2021, included information on how to submit formal comments on the project beginning at 8:45. As stated in the video, "Comments or suggestions should be specific about what should be covered in the EIR, not general comments about the project." As also stated in the video, comments were accepted by mail to the County DPR office or by email to the County DPR email address. Comments submitted without identifying or contact information in the comment section of a website are not formal comments submitted about the project and do not require a response, but County DPR has provided these responses as a courtesy. Patrick Williams, comment from April 4, 2021 (1): Comment noted. No changes to the Draft EIR are needed.

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	preserve the comments here as official comments that go in the record for the project. Thank you. Dqnorton1 7 months ago The proposed park concept has many components which will cause direct negative impacts to the local neighbors and community of Alpine at large. The impacts include traffic and safe access issues, noise and light pollution, water and septic issues, and impacts to the environment including to the Engelmann Oaks, Quino checkerspot and native grasslands. The proposed park concept will cause spill-over effects on Wright's Field Ecological Preserve and will fragment the MCSP. Patrick Williams 7 months ago parking area (270+ parking spaces plus utility spaces) amounts to 2.5 acres of parking for "thousands of daily users" per Rhodes and Associates site study. Courtney Norton 7 months ago The proposed park concept as it currently stands has many components which will negatively affect the Alpine community and Wright's Field Ecological Preserve. These impacts include biological resources (Engelmann Oaks and Quino Checkerspot Butterflies and the native grasslands), greenhouse gas emissions, transportation and traffic and wildfires. Please record the comments here as official comments that go into the record for the project. Thank you. Julie 1016 7 months ago Alpine community already has a number of indifferently maintained, underutilized parks and recreational facilities designed to provide many of the amenities this project seeks to build. Why add redundant facilities in one large park? As part of the alternative or in parallel negotiations, the County should seek alternate sites (such as Shadow Hills) for the all-terrain bike park, all-wheel park, and the seven acres of sports fields. Multiple distributed sites and options have been identified by the county and by PAH for these larger proposed sports	Frank Landis, comment from April 4, 2021: The video on which Mr. Landis commented served as the scoping meeting, as in-person meetings were not possible due to COVID-19 restrictions on gatherings. Please see MR-11 (Public Outreach) for more information on the County's public outreach efforts and scoping period. No changes to the Draft EIR are needed. Dqnorton1, comment from April 5, 2021, and Courtney Norton, comment from April 5, 2021: Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. Please refer to Section 4.1, *Aesthetics and Visual Resources* of the Draft EIR, which describes the visual setting of the project and evaluates the potential impacts from the project on scenic vistas, scenic resources, visual character, and light and glare. It also identifies the existing designated visual resources, including designated scenic views and scenic highways, if applicable, that are visible from within the project site, as well as existing sources of light and glare in the project site and the vicinity. Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater) for a description of the water supply and wastewater conveyance and treatment. Also see the response to comment O8-80. Areas within the Alpine Park Preserve are anticipated to persist in perpetuity through management activities and permanent protection mechanisms inherent in the MSCP preserve assembly and the RMP (see MR-4, Natural Resource Mitigation). Additional details on indirect impacts on the adjacent Wright's Field Preserve are provided in the RS-Draft EIR, BRR and MR-2 (Indirect Impacts on Wright's Field). Please refer to MR-8 (Greenhouse Gases and Energy) and the response to comments O2-47 and O2-48. Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Patrick Williams, comment from April 4, 2021 (2): Comment noted. The Draft EIR that acknowledges the potential increase in

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	facilities, areas that where there are fewer impacts, and where they are closer to the people who would use them. These local facilities should be connected by a system of safe walkways, bike paths, and trails. The County should revisit joint use and partnering options with Alpine Unified School District for shared investments in sports field facilities at Shadow Hills Elementary School, Joan McQueen Middle School, and other land-holding/ management entities to revitalize and upgrade currently neglected, existing, active-recreational facilities with monies already earmarked and/or raised for such projects, rather than building more of the same facilities.	visitor use of the park and associated effects. No further response is required. No changes to the Draft EIR are needed. Julie 1016, comment from April 6, 2021: Please see MR-12 (Parks Master Plan) for additional information regarding the County's need for parkland in the Alpine community. Please also see the response to comment I1-2 regarding consideration of alternative sites. No changes to the Draft EIR are needed.

Comment Letter I40: Laurie Nuger, November 15, 2021

Comment#	Comment Text	Response
I40-1	I have been a resident of Alpine for 5 years and have enjoyed the beautiful surroundings and quiet rural environment that Alpine is known for. I walk at Wright's Field almost every day with my dog and love the quiet beauty and wildlife. Our family especially enjoys the night sky we are so fortunate to see in Alpine. I respectfully submit the following for consideration and response. I am in favor of many passive park amenities that will improve the community's enjoyment of a new park, situated within a natural preserve, but very concerned about the impact that this large park scope will bring regarding safety to the community due to access, traffic as well as fire safety. I am also concerned about noise and air pollution, water usage and wildlife and environmental impact.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This comment regarding the commenter's concern about the project due to its scope is acknowledged. The commenter's preference for a passive park alternative is noted for the record. Please refer to MR-10 (Passive Park Alternative) for more information.
I40-2	Traffic and other risks based on current DEIR proposal, which states up to 500 people per day. Firstly, how is this a community based park if the county is building it to receive 500 people per day. I think all of us would agree 500 people per day is a high use park. This is mostly only seen at high use trails and beaches in San Diego county or city	See MR-12 (Parks Master Plan) for additional information regarding the need for parkland in the Alpine Community. The park is funded through County General Funds and no additional taxes would be required to construct or operate the park. No changes to the Draft EIR are needed.

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	parks. It seems to me that the county is proposing building a "mega park" here in Alpine, on a build it they will come proposition. This is an active wild life area, in an extreme climate most months of the year. *Where is the data or surveys that the county has done to justify the need for a park of this size and scope? What is the cost of maintaining such a park? What is the tax impact of this project to San Diego at large? What are the additional tax implications to the local community?*	
I40-3	Lack of response in the DEIR regarding bicycle access. Bike access was only mentioned as a reference to the bike 2050 initiative. A plan for bike accessibility would be an important consideration for providing safer access to this park, large or small. How is the county responding to the Bike 2050 initiative with respect to this or any park proposal?	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I40-4	**Sports Field Redundancy and Excessive light and noise pollution in the proposed location.** I live in direct line of sight from the proposed fields and I am concerned about the light and noise disturbances that this proposed park will bring. Additionally, the sports fields are a large part of the environmental and community impact and *I would like to know why the county is not considering other options in our community, where fields could be improved, are being improved, and could mitigate safety and traffic impact of kids getting to and from the park and other costs. Is the county as a whole looking at other options in Alpine to reduce the congestion and traffic safety and redundancy? Why did the* DEIR not provide any data mitigating redundancy and thereby costs in any of the other Alternatives, namely 2, 3 or 4? These concerns have been raised in many of the county led community meetings as an important community topic and the DEIR still does not address these community concerns	See MR-12 (Parks Master Plan) for more information regarding park needs and MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No changes to the Draft EIR are needed.
I40-5	I think there are many residents in addition to myself who were surprised at the county's change in scope as the original county park proposal was a passive park. This original proposal, stated	Please see the response to comment I40-4. With respect to the portion of the comment about a passive park alternative, please refer to MR-10 (Passive Park Alternative) for more information. Please also see MR-11 (Public Outreach) for more information

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	as Alternative 1 in the DEIR is exactly what is reflected in the county's own public outreach data. The community was expecting more of a discussion of options, but even the first Zoom meeting run by the county started with, this is what the county is doing in this parcel, rather than we are exploring the following options. There seemed to be a big jump from lets find out what the community wants to this is what they are getting, during COVID when communication was strained and outreach was limited. The community deserves additional time to understand the implications proposed here as well as time to provide input to our Board of Supervisors, so they can choose a park that the community wants.	on the County's public outreach efforts. No changes to the Draft EIR are needed.
I40-6	Thank you for the opportunity to comment on the Alpine County Park Project's Draft Environmental Impact Report (DEIR).	The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I41: Joyce Nygaard, November 15, 2021

Comment#	Comment Text	Response
I41-1	Hello Ms. Prowant, Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Alpine Park Project. I have lived in Alpine since 1999. Although I now live off of Alpine Blvd. in "downtown" Alpine, when I first moved here I lived just two properties over from the proposed Park. Because of this, I am concerned about some of the conclusions reached in the DEIR, particularly regarding park hours, noise and aesthetics.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This comment regarding concern about the project due to proposed park hours, noise impacts, and aesthetics is acknowledged. No changes to the Draft EIR are needed.
I41-2	The County Parks website states that the Alpine Park will be open 7 days a week, from sunrise to sunset. The same statement is reiterated in Section 1.1, Overview, of the DEIR. Yet, page 20 of the Executive Summary states that "quiet hours are from 10 p.m. to 7 a.m." and that "except for special events" all onsite events must end no later than 10 p.m. Page 6 of the Executive Summary states that the project will result in new sources of lighting that	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.

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	could adversely affect nighttime views. Chapter 4 of the DEIR, Section 4.1.3.2 lists County Goal COS13 "to preserve dark skies that contribute to rural character and to restrict outdoor light in semi-rural lands to retain the quality of night skies." But Chapter 3, Section 3.3.1 states that the proposed parks "outdoor lighting would be solar powered and photovoltaic panels...mounted on six overhead structures over parking spaces." If the park closes at sunset, why the need for so much lighting? Does the sun set at 10 p.m. in Alpine?	
I41-3	As stated in my April 7th letter to the County regarding the CEQA for this project (page 211 of the DEIR appendix), I am also very concerned about noise and how it carries in this location. The property is zoned A70, S80, and R-R. Sound levels are limited to 50 dB from 7a-10p and 45 dB from 10p-7a. Data included in the DEIR appendices shows that two skate parks were tested for noise. The park in Lake Forest had a maximum of 15 skaters during test time, with an average sound level of 66.5 dBA and a max of 85 dBA. The park at Ladera Ranch, which is smaller than the skate park proposed for Alpine, had a maximum of 5 skaters and generated sound levels of 59.6 dBA and a max of 74 dBA at 90 feet. These levels were obtained during the day when the skate parks were relatively empty, yet their noise measurements were still higher than the proposed park's zoning allows. Neither of these skate parks is located in a semi-rural area where sound may travel farther with fewer obstructions to block it. The proposed skate park is to be all concrete so sound will be reflected, not absorbed and would be sustained throughout park hours. Readings were also obtained at local soccer games which generated noise levels of 52. dB and 59.9 dB. The DEIR also did not specifically address the sound of basketballs, pickleballs, or baseballs. The mitigation mentioned for noise issues in the DEIR is for the County to enforce its rules for park behavior. Those rules include: dogs must be on a leash, no obscene language, and quiet hours are from 10 p.m. to 7 p.m. How does that mitigate the noise generated by skateboards sliding on rails and clacking on concrete?	To further expand on the San Diego County Code of Regulatory Ordinances referenced by the commenter, Table 4.13-3, San Diego County Code Section 36.404 Noise Limits, addresses the zoning and noise levels. This section further states, "If the measured ambient level exceeds the applicable limit noted above, the allowable one-hour average sound level shall be the ambient noise level, plus three decibels." Table 4.13-2, Measured Existing Noise Levels in the Study Area, shows that ambient noise levels within the area exceed the 50-dBA 1 hour L_{eq} that is referenced in the San Diego County Code of Regulatory Ordinances. The measurement of the all-wheel park does not require these land uses to be in a rural environment, only that the baseline noise level not add to the measured noise level. The Draft EIR in Table 4.13-7, Measured Noise Levels at Skate Parks, states: > It should be noted that the Etnies skate park included amplified music, which set the baseline of the noise measurement. Amplified music from the speaker was measured at approximately 57 dBA L_{eq}, approximately 10 dB below the measured noise from active skaters. The amplified music was measured while skating activity was absent. Other noise sources present during this time were automobiles passing along State Route 241. Noise measured as the baseline was 10 dB below the measured skating activity and is considered negligible. Measurements of the skate parks were taken Saturday March 6, 2021, and included a maximum number of 15 skaters. The methodology for analyzing operational noise as it relates to

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		project operations is discussed on pages 4.13-12 and 4.13-13. Specifically, operational noise was analyzed using SoundPLAN, which is a three-dimensional model to calculate operational noise from the project. Page 4.13-13 states, "Other land uses that would be included as part of the project, including the dog park, basketball and pickleball courts, the bike skills area, and baseball fields were analyzed using default information included in SoundPLAN acoustical software. The SoundPLAN modeling platform was used to model the operational noise from the noise sources referenced as well as accurately model the surrounding land uses and any intervening topography, including the proposed berm." The results of the analysis (presented in Tables 4.13-11 and 4.13-12) indicate that traffic noise levels would increase by no more than 1 dB and project-related operational noise would increase the ambient noise level by no more than 1 dB. While the analysis indicates that an increase in noise may occur, any increase would comply with applicable thresholds laid out in the San Diego County Code of Regulatory Ordinances. As stated in Section 4.13, *Noise and Vibration*, of the Draft EIR, no significant noise impacts would occur with incorporation of **MM-NOI-1** through **MM-NOI-3**. No changes to the Draft EIR are needed.
I41-4	Figure 4.1-4 of the DEIR shows simulated views of the park property from various areas outside the park. This section states that "the public views of the project site, available from South Grade Road and Wrights Field Preserve would change from expansive rural views to a view of ...recreational development. In fact, "along the southern portion of the project site where the berm would be 12 feet higher than the roadway, the landscaped berm would make up the whole view to the west." As stated in Section 4.1.3.2, County goal COS-11 is preservation of scenic resources, including vistas. But Section 4.1.4.3 states the "visual character of the site would change from the existing wide-open space of vast rural fields to a complex development of several different recreational structures and features large in scale, connected with impervious surfaces in the form of access roads, paths, and parking lots." The DEIR mitigation for this loss of	As shown on the "before-and-after" views in Draft EIR Figure 4.1-3, the differences resulting from the project would be the presence of a raised berm (as noted in the comment) and additional conforming vegetation including trees. Beyond these additions to the visual setting, the view of the park area from a southern perspective would be essentially unchanged. It is not anticipated that a "loss of visual character" would occur as a result of the project. No changes to the Draft EIR are needed.

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	visual character is to plant native vegetation on the edges of the proposed park	
I41-5	In Chapter 6 of the DEIR, Alternative 4, the Reduced Project Alternative is presented as being the Environmentally Superior Alternative with the second fewer negative impacts while still meeting the Project objectives. I agree and while this park is still larger than I originally wanted, I would support this Environmentally Superior Alternative.	The commenter's preference for the Reduced Project Alternative is noted for the record. No changes to the Draft EIR are needed.
I41-6	I would like to ifficu all notices relating to this project at jmnygaard@hotmail.com	The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I42: Kevin Oconner, November 8, 2021

Comment#	Comment Text	Response
I42-1	I am sending this email as a public comment to the proposed Alpine Park, which I oppose. I am a 30 plus year owner and resident of Alpine and Rancho Palo Verde, which is directly adjacent to the proposed park. My address is XXXX Via Viejas Oeste. There are numerous reasons I oppose the park as described:	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I42-2	• It is too large • There are too many ongoing maintenance and cost issues associated with the proposed plan.	This comment expressing opposition to the project is noted for the record. No changes to the Draft EIR are needed.
I42-3	• The traffic conditions on South Grade and Tavern Roads are already dangerous (a pedestrian was hit and killed several years ago). • The plan does not mitigate the already dangerous traffic conditions. The roads have no shoulders in most places, forcing pedestrians, including local school children, to walk in the road bed. Bicyclists also veer into the road, a recipe for another tragic accident. The park, as proposed, will only bring more vehicles onto these unsafe roads.	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

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I42-4	• As an alternative, a small park that complements Wright's field nature preserve would be welcomed by most residents. Please confirm that you have received my comments and that they will be included with those that are presented in the review phase.	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.

Comment Letter I43: Jay Orband, November 15, 2021

Comment#	Comment Text	Response
I43-1	I would like to say yes to local Alpine Park thank you Jay Orband Alpine resident!	The County appreciates the comments submitted on the Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I44: Rebecca O'Sullivan, October 1, 2021

Comment#	Comment Text	Response
I44-1	Good morning. I'm so excited for this project! I do apologize if this question has been addressed. Are there going to be safety measures added to get in and out of the area? This a dangerous curve and people speed like crazy. It would break my heart to hear of a child getting hurt trying to get the park. Also, do you know if alpine has decided to build sidewalks at least on the park side for kids to get there safely from alpine boulevard?	The County appreciates the comments submitted on the Draft EIR. The commenter's support for the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

Comment Letter I45: Miles & Amanda Pavich, November 16, 2021

Comment#	Comment Text	Response
I45-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report ("DEIR") We moved to Alpine a year and a half ago with our children expressly for the rural, open spaces, access to nature, and dark skies. We are regular users of active and passive recreation areas/parks. We live across South Grade from the proposed park site, the direct line-of-sight view from our property is the Project acreage.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I45-2	As neighbors who will be directly impacted by this Project, the CEQA issues we are concerned about and previously commented on include: 1- Traffic safety and noise; 2- Use of tax dollars and cost of Project upkeep/ maintenance; 3- Fire Safety; 4- Lighting and Dark Sky Designation; 5- Property value decline due to changed view ; 6- Alternative Park Design.	The commenter's concerns regarding the cited topics are noted for the record and are addressed individually below. Further information concerning those topics can be found in Section 4.1, *Aesthetics and Visual Resources*, and Section 4.17, *Transportation and Circulation*, of the Draft EIR and Section 4.20, *Wildfire*, and Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the Draft EIR are needed.
I45-3	Our previous comments and questions are included below the concerns and questions we have during this public comment period. After review the DEIR and appendices, we are deeply disappointed that DPR continues to push forth a project that is out of step with the local, county, and state goals for the environment, equity, and preservation.. The DEIR and appendices themselves were largely boiler-plate, with glaring errors and omissions that must be address before this project is approved.	This comment is acknowledged. Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of the environmental impacts and existing policies. No changes to the Draft EIR are needed.
I45-4	4. **Traffic Safety and Traffic Noise** Simply adding a three-way stop at two locations on South Grade road will not mitigate the impacts of an expected 500 cars per day. Furthermore, if attendees of events allowed at this County Park are like the ones at other County Parks, they will be parking their cars in our neighborhoods and on the roadway to avoid paying the entry fee. What more will be done to mitigate these impacts?	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. See MR-13 (Noise and Lighting) for more information on traffic noise impacts. No changes to the Draft EIR are needed.

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	As stated above, we live across South Grade Road from the proposed park site. We travel on this road to and from our home daily. South Grade is a narrow, two-lane country road with dangerous twists and turns where residents travel at high speeds. The current Project details nearly 300 parking spaces and facilities adjacent to and emptying out onto this road, anticipation of large gatherings, tournaments and events, and no safe walkways, sidewalks or horse trails to get to and from the park. The Project's all-wheels park is a tempting destination for local kids, like ours, to ride to without any safe bike paths or trails to get there. County representatives have described this as a "regional destination park," designed to make people travel by vehicle. This, and the amount of people the mega-park is designed to accommodate, will greatly impact the amount of cars on the road and traffic noise we, as neighbors, will experience. In light of the three deaths that have occurred on that road and the very recent hit- and- run of a teenage girl that left her with serious injuries, it seems utterly irresponsible to proceed with ANY PART of this Project until concrete traffic/road plans are proposed and vetted, and analyzed in the EIR. Our own 18-year-old sometimes has to walk that road on his way to work, if he gets called in when we are away from home with the car. County representatives have merely stated "we're working closely with other departments on this." Putting out a proposal without a traffic plan demonstrates a lack of understanding of the seriousness of adding large amounts of park traffic to an already dangerous road. Putting enticing play areas to attract local kids–without a safe way to get them there–is outrageous. Not providing a safe way for horses to get to and from the park in a horse-community, requiring trailering, also adds to the noise, congestion and safety issues. These traffic safety and noise impacts need to be avoided, or, at worst, mitigated below the level of significance.	
I45-5	**2. Cost of Project Upkeep and Maintenance** As we stated earlier, Alpine has a number of existing parks with sports field that have been unmaintained. The renovations to Joan MacQueen Middle School's facilities are going before the	Please refer to MR-12 (Parks Master Plan) for information on park needs in the Alpine community This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts

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	Board of Supervisors for final approval at their November meeting, this week. Why are redundant facilities being proposed, at massive taxpayer expense and great loss of natural resources, when existing facilities are in disrepair?	presented in the Draft EIR. No changes to the Draft EIR are needed.
I45-6	Alpine already has several active recreational fields (that utilized public funds to build) that are in disrepair, decay, or closed to the public. As taxpayers concerned with good stewardship of undeveloped land AND our dollars, it seems financially irresponsible to replace open space near an Ecological Preserve with a high-cost park with redundant facilities. The Alpine Community Plan Update (COS 4.5) calls for the support of joint powers agreements for park and recreational facilities. It would be far less expensive to taxpayers to repair and/or upgrade existing recreational assets using Joint-Use or Joint-Maintenance agreements, in order to fulfill County recreational/ park goals. Active-use facilities and grass fields such as those detailed in the Project are expensive to maintain, and many of these facilities in existing County Parks are currently in disrepair, closed, and/or neglected from lack of funds. County representatives have publicly stated "there are many ways to generate revenue for a park" and some general ideas for how parks generate revenue are listed on the website. However, there is no plan detail for how the upkeep and maintenance costs for THIS SPECIFIC PARK will be generated. With tax revenues falling because of the Covid -19 Pandemic, how will this park be any different, once it's built? What is the taxpayer impact if there are not enough funds to maintain these facilities, and what are the actual costs to the local users of the Park? These questions about utilizing Joint Use/ Joint Maintenance agreements to fulfill County goals while managing taxpayer dollars more effectively, as well as a concrete fiscal plan for continued upkeep and maintenance of the Project need to be analyzed in the project EIR.	Please refer to the response to comment I45-5, above. No changes to the Draft EIR are needed.
I45-7	**3. Fire Safety** DEIR Section 4.20 (page 458) County of San Diego General Plan (page 467)	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other

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	"The Community of Alpine is situated to arguably pose one of the worst Wildland-Urban Interface conditions in the County of San Diego and is in a known location of repetitious major wildfire occurrence. Such locations of repeat occurrence are known as "historical wildfire corridors" Per Rhode and Assoc. 2020 "Potential Choke Points/Entrapments: Be prepared to shelter community population in Alpine as all evacuation routes may be cut off by fire spread. Farthest east Alpine area of "Old Ranch" is more rural, and has numerous areas with entrapment potential." "The Community of Alpine is situated to arguably pose one of the worst Wildland-Urban Interface conditions in the County of San Diego and is in a known location of repetitious major wildfire occurrence. Such locations of repeat occurrence are known as "historical wildfire corridors" Per Rhode and Assoc. 2020 "Potential Choke Points/Entrapments: Be prepared to shelter community population in Alpine as all evacuation routes may be cut off by fire spread. Farthest east Alpine area of "Old Ranch" is more rural, and has numerous areas with entrapment potential." These notes are what we are continuing to inquire about. How can this be accomplished with a large suburban-style park in a rural area?	sufficient controls that would be in place to reduce wildfire risks. No changes to the Draft EIR are needed.
I45-8	Alpine is a high-risk fire area. Our neighborhood has one exit route for fire evacuation, utilizing South Grade Road. The proposed Project would significantly increase traffic and congestion on that road. The situation could become dire if a fire evacuation was needed while a large sporting event or gathering was going on at the proposed sports fields or pavilion. Additionally, the Project includes BBQ pits/grills, a high fire hazard for all of the houses that surround the proposed Project land, like ours, and for Wright's Field Ecological Preserve. Inclusion of and allowing any type of fire or grilling at this location is utterly irresponsible in light of the sensitive habitat of the adjacent Ecological Preserve and known challenge of a being	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, Section 4.9, *Hazards and Hazardous Materials*, and the FEOA in Appendix J of the RS-Draft EIR for additional information concerning wildfire. No changes to the Draft EIR are needed.

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	in high fire-risk area. These impacts must be avoided or, at worst, mitigated below the level of significance.	
I45-9	**4. Lighting and Dark Sky Designation** Once again, these impacts are not being avoided, but actually INCREASING as detailed in the DEIR, by allowing lighting and amplified sound at the functions (Sec 4.3) permitted at this park from 7am- 10 pm. In section 4.1-2, mentioning the Alpine Community Plan (sec 40) that special consideration is to be given for conservation in "… astronomical darky sky areas." Once again, claims that the Project is in alignment with the Alpine Community Plan, are false. What will be done to align with our rural, dark sky area?	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I45-10	Furthermore, it is noted on p.367 that the zoning of the project site (surrounding uses) all fall under Zone 1. Therefore, the applicable base sound level limits (before any corrections for ambient noise levels) are 50 dBA Leq between 7 a.m. and 10 p.m. and 45 dBA Leq between 10 p.m. and 7 p.m. However, in the DEIR's own studies (Table 4.13-6 – page 371) soccer field noise averaged 59 dBA at 115 and skate park noise averaged up to 66.5 dBA at 60 feet. How do these proposed amenities line up with the base sound level limits for this rural area?	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I45-11	We intentionally purchased a home in Alpine because it is a more rural community with an ongoing Dark Sky Designation in process. We have no streetlights. Our home is on a hill and directly overlooks the proposed site, also with a completely dark, natural nighttime view. The Project calls for a 24/7 live-on site volunteer and "safety lighting," and the ball fields to be "lighting-ready should the people of Alpine decide to add it later in the future," according to the County's representatives in the January public meeting. The lighting required by a permanent resident and for parking lot safety alone will eliminate completely the current dark sky; it will also interfere with local wild animal behavior and the natural beauty of the sunsets, dusks, and starry nights. This is in conflict with Alpine's efforts to achieve Dark Sky designation. These impacts should be avoided or, at worst, mitigated below the level of significance.	See MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.

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I45-12	**5. Home Value Decline Due to Loss of Natural View** The DEIR states Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points During Operation. Operation of the project would transform rural, undeveloped land to a complex regional park with several different development features, substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve. How Although the berms and trees will shield the parking lot from the street level, we (and the majority of the residents who live adjacent) do NOT live street level with the proposed park. Nothing in the DEIR addresses the loss of this view, how solar panels will be directed so as not to reflect into adjacent property or consequently, property values declining due to the loss of this beloved view and natural sunsets being blotted out with the artificial lighting allowed on site (point 4 above). The question is this: How does the DEIR meet Goal LU-2: Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character, and how does it meet Goal COS-11: Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized? In Section 4.1.4.2, Since the project will visually block and physically gate the most significant public San Diego County vista in Alpine, the project as planned clearly violates CEQA Appendix G section 1., 2., and 3., and the County of San Diego Guidelines for Determining Significance for Visual Resources (County of San Diego 2007) on page 91. How will the EIR and this project as proposed be able to mitigate the taking of Alpine's most accessible scenic view?	Please refer to the response to comment O8-82. Overall, the project would comply with County guidelines and requirements for lighting, which require lighting to minimize light pollution to the greatest extent possible and be sensitive to ecological needs. Please see MR-13 (Noise and Lighting) for more information on lighting impacts. No changes to the Draft EIR are needed.
I45-13	One of the key features of our property is the natural view over the County-owned land and Wright's Field Ecological Preserve. We purchased this home because of the beauty of the natural landscape viewed from our property, and paid a premium for it. The Project as drawn would make our direct view, not mitigated by trees or berms, a large, asphalt parking lot, cars and/or solar panels, bathrooms, and turf fields with chain link fences. If these facilities are allowed to fall into disrepair as in similar County	This comment discusses the project's potential impact on home values and does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR as required by CEQA. No changes to the Draft EIR are needed.

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	Parks, we would be looking directly at an eyesore. Furthermore, depending on the way the solar panels are installed, they would be reflecting directly onto our property. This will negatively impact our resale value beyond any suggested benefit a park might bring. These impacts need to be avoided, or mitigated below the level of significance.	
I45-14	**6. Alternative Project Design** Perhaps most disappointing was the oversight of the inclusion of a smaller, nature-based park as a project alternative, as we requested. This glaring omission was even more troublesome when DPR went before the Board requesting consideration for a grant ONLY AVAILABLE TO PARKS WITH A REGIONAL DRAW. How is this congruent with the statements made time and time again at the community outreach meetings (Jan 2021 esp) this is a park for the LOCAL community? How is this congruent with the State Climate Action Plan? We would like to suggest, as an alternative to the current Project, a smaller, nature-based park, with a focus on fiscal and environmental sustainability and native plants. We would like the construction to be carbon neutral, and the Native Peoples to be meaningfully included in the process. This minimally-developed park should have little to no impacts to the biological, cultural, and other resources of the project site, Wright's Field Ecological Preserve, and neighboring properties. It should also address traffic and road improvements needed, and able to meet federal, state, and county goals.	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative) for additional information on this alternative and MR-11 (Public Outreach) for an overview of the County's public outreach efforts. In regard to the grant application to fund a regional park, the Alpine Park Project is not funded by this grant. The project is funded through County General Purpose funds. No changes to the Draft EIR are needed.
I45-15	We again respectfully request that these potential impacts still not addressed in the DEIR to both our personal property and safety, and those of the larger community, including traffic safety and noise, financial costs and upkeep, fire safety, effect on Dark Sky Designation, and loss of home value, be analyzed and to avoid the significant ones. Please also make sure that we receive all updates and meeting notices on this project, at ampavich@mac.com and mmpavich@me.com and the mailing address above. Thank you, again, for the opportunity to bring light to these important issues.	Responses to each of the issues raised in this comment were provided in responses to comments I45-4 through I45-14 above. No changes to the Draft EIR are needed.

Comment Letter I46: Parnell Pollioni, September 30, 2021

Comment#	Comment Text	Response
I46-1	This is my old email address and this box is not checked. Todd Scheuer Alpine's new President can be found at todd.scheuer@alpinelittleleague.com If you need me my address is parnell@alpinelittleleague.com	This comment and the included contact information will be shared with the County of San Diego Board of Supervisors. No changes to the Draft EIR are needed.

Comment Letter I47: Michelle Rader, November 15, 2021

Comment#	Comment Text	Response
I47-1	I am writing, again, in response to the SD County DPR proposed Alpine Park Project and the DEIR which has been provided for community review. My hope is that these comments will be taken seriously, as the previous comments submitted by many of us in regards to the park plan have been unceremoniously disregarded.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I47-2	To begin, the development of the county's park plan for Alpine, which was initially billed as a local park for Alpine, has shown itself to be a laundry checklist of features for a county regional park to support the seeking of millions of dollars in grant funds from the state. The county representatives as well as Alpine Community Planning Group have repeatedly stated that this is to be a local park. Yet it is clearly planned and outlined as a regional park in the county's documentation and the grant application materials. This same double-speak has peppered talk regarding the plan's scope as a sports complex versus local active park. It is clearly a regional sports complex, as defined in numerous descriptions in the county's own websites as well as elsewhere.	The project is funded by County General Funds. The project provides an opportunity to develop a portion of the project site as an active park for local recreational use and to conserve a substantial portion of the property as open space. The proposed 98-acre project site would bring County DPR closer to reaching its park-per-resident goals, as the Alpine CPA currently has a deficit of local parkland. See MR-12 (Parks Master Plan) for details related to the need for active park facilities. No changes to the Draft EIR are needed.
I47-3	So who is this Alpine park being built to serve? A park in a largely rural community, served by a rural twolane roadway, more than a mile from the small village center, and accessible only by car or through nearly a mile of trails in an	See MR-12 (Parks Master Plan) for details related to the need for active park facilities. No changes to the Draft EIR are needed.

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	environmentally and historically sensitive preserve. As planned, this park which was to be a local Alpine park is clearly being built to serve special interests well beyond the heart of Alpine.	
I47-4	Rife with errors and omissions, the DEIR grossly underestimates and skirts a great deal of the impacts to the local area, including environmental, traffic, safety and fire, aesthetics, and more. Many of these impacts are unmitigable, as clearly stated in a comments letter from the State Department of Fish and Wildlife, dated April 7, 2021 and publicly viewable in files.ceqanet.opr.ca.gov. This letter provides only a portion of impacts of our concern, but it is enough in my view, without addressing the many other issues which should drive a complete review and revision to the county's park plan.	The comment does not provide specific citations to impact analyses alleged to be inaccurate. For that reason, a direct response is not possible. The RS-Draft EIR featured revisions to Section 4.4, *Biological Resources*, Section 4.9, *Hazards and Hazardous Materials*, Section 4.20, *Wildfire*, and Chapter 6, *Alternatives*, of the Draft EIR. See Chapter 3, *Clarifications and Modifications to the Recirculated Draft EIR*, of the Final EIR for detailed revisions made in this Final EIR. Also, it should be noted that all impacts have been found to be less than significant, including those that require some form of mitigation. No changes to the Draft EIR are needed.
I47-5	Can we entrust our public lands and the impacts in our communities to your process? Do we have your consideration, as residents in the immediate area of Wright's Field and the Alpine Park Project location? During the past several community input meetings and comment submissions, more than 2/3 of respondents from our community have opposed the park as planned. Is 2/3 not enough to gain your attention and consideration?	Please see MR-11 (Public Outreach) for more information on the County's public outreach efforts and scoping period. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR, and no changes to the Draft EIR are needed.
I47-6	The scope of the plan and its impacts on the sensitive area is far too extreme and inappropriate. It is time to take a step back and consider the true needs of the local area in which this subject property and park plan resides. Do the right thing for Alpine and return to the drawing board, provide proper outreach and communication with the community, and reconsider the irreversible impacts before it is too late. Please reduce the scope of this park plan, or reconsider the original plan as a submissive park. The impacts are far too great, and irreversible.	Please see Chapter 5, *Cumulative Impacts*, of the Draft EIR, for information and a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. The commenter's request for further consideration of alternatives is noted for the record. Chapter 6, *Alternatives*, was revised in the RS-Draft EIR to include analysis of a passive park alternative. Please see the response to comment A1-16. Please also see MR-10 (Passive Park Alternative) and MR-11(Public Outreach). No changes to the Draft EIR are needed.

Comment Letter I48: Denae Ranucci, November 15, 2021

Comment#	Comment Text	Response
I48-1	My name is Denae Ranucci and I am a resident and homeowner in Alpine, CA. I have some major concerns surrounding the DEIR for the Alpine County Park Project that I would appreciate having addressed.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I48-2	**Biology** The proposed mitigation for the Quino Checkerspotted Butterfly primarily consisted of preserving the same number of host plants onto a smaller footprint of land. This butterfly has been known to show territorial behavior according to the Fish and Wildlife Service (https://www.fws.gov/refuge/san_diego/wildlife_and_habitat/threatened_and_endangered_species/Quino_Checkerspot_Butterfly.html). What impacts will this project have by reducing the geographic territory of this endangered species? The Quino Checkerspotted Butterfly also is known to display "hill topping" behavior (https://www.fws.gov/refuge/san_diego/wildlife_and_habitat/threatened_and_endangered_species/Quino_Checkerspot_Butterfly.html). With the visual barrier to the road being of raised elevation. What assurances can be made that "hilltopping" behavior on this barrier, adjacent to the road, will not result in increased butterfly mortality due to vehicle collisions?	**MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** provides the details needed to support the conclusion that mitigation will be adequately provided to address impacts on QCB. This mitigation measure has been developed in consultation with USFWS, which is the agency responsible for implementing the regulations promulgated to comply with the FESA. The performance standard is specified (i.e., no net loss of QCB host plants), and compensatory onsite mitigation and monitoring standards are also included in **MM-BIO-3**. **MM-BIO-3** has been revised slightly in the RS-Draft EIR to make it clear that the County will provide compensatory mitigation and habitat restoration, as well as monitoring regardless of the status of the ITP. The visual barrier from the berm along South Grade Road is not expected to affect the behavior of QCB individuals because there is very limited to no habitat for this species on the east side of South Grade Road within residential development, nor south of South Grade Road. No changes to the Draft EIR are needed.
I48-3	Also, the DEIR addressed the migration of land-based animals but failed to recognize the importance of the grassland ecosystem on local bird populations. How will the project mitigate reduced territory for bird populations?	Impacts on native grasslands were addressed in the Draft EIR and additional grassland endemic avian species have been evaluated in the RS-Draft EIR for their potential to be affected by the project. Mitigation for significant impacts on special-status avian species is addressed through **APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**. In addition, the County will restore native grassland through **MM-BIO-10: Native Grassland Mitigation.** See MR-3 (Native Grassland Impacts) for more information. No changes to the Draft EIR are needed.

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I48-4	With water being a scarce resource, the amount of water used both during construction and in continued maintenance is a large concern. Considering that farms and locals are being forced to reduce their water use, where will the project get their water and how will this align with the goal to reduce water usage by the county and the Department of Parks and Rec.?	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, as well as MR-15 (Water and Wastewater), which discuss the water supply and service boundary of PDMWD. Also see the response to comment O8-58. No changes to the Draft EIR are needed.
I48-5	**Aesthetics** The plan calls for a barrier to enhance the view of the property along the road but does not note the impact made when looking down onto the project. The view of the land from surrounding hillsides (such as off of West Victoria Drive), will be significantly impacted and is not noted in the report. This needs to be considered and addressed as well.	Please see the response to comment O8-82. For additional information, please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR, which describes the visual setting of the project and evaluates the potential impacts from the project on scenic vistas, scenic resources, visual character, and light and glare. It also identifies the existing designated visual resources, including designated scenic views and scenic highways, if applicable, that are visible from within the project site, as well as existing sources of light and glare in the project site and the vicinity. As stated in Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR, impacts would be less than significant with incorporation of **MM-AES-1** through **MM-AES-3**. No changes to the Draft EIR are needed.
I48-6	**Traffic** The park has no walking access from the areas of high density in the "village" area of Alpine. Currently the only safe walking access is provided through the adjacent land owned by the Back County Land Trust. These trails are maintained by volunteers, not accessible for those in wheelchairs or with strollers, and still require nearly a mile walk from the only public access point, a point next to Joan MacQueen High School. To get to Joan MacQueen, there is a proposed DG pathway that has yet to be built, to create a walkable route to the town center. This lack of public transportation and walkable access will cause this park to be a car dependent destination. This is not only an environmental inequality social issue, but also will create a traffic issue along South Grade road. The lack of transportation issues and commitment to walkable access has made the traffic section of this DEIR woefully inadequate. What requirements will be made to ensure that the park can be accessed by	The county will not charge for parking. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Parking spaces will not exceed 240 spaces. The number of parking spots provided is based on current park design guidelines and parking requirements; however, from a day-to-day operations standpoint, it is unlikely that the parking lot would be fully occupied. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. In addition, ADA accessible features throughout the park would include accessible picnic tables, restrooms,

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	everyone? The DPR previously disclosed in a meeting that a parking fee would NOT be implemented, however I do not see this anywhere in the DEIR. If a parking fee is implemented, then many who have lower income will not be able to use it. What analysis has been done to ensure that the park will be able to be accessed by the people it is being built for? The only neighborhood that has walking access, directly across the road, have their own private HOA managed lake and park, along with large lot sizes that would reduce or eliminate their reliance and use of a County maintained park.	pathways, and rubberized surface areas on the playground. No changes to the Draft EIR are needed.
I48-7	**Fire** As a local homeowner, who cannot get home insurance due to our "fire risk", it astounds me that BBQ pits would be permitted so close to such flammable vegetation. If a fire did start in this park, the spread and potential destruction to surrounding homes would be massive. Please reconsider the inclusion and allowance of such fire dangers in the area	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the Draft EIR are needed.
I48-8	**Discussion of Alternatives** I believe that the proposed alternatives were poorly chosen and do not accurately reflect the best options for this project's goals and location. The County's Department of Parks and Rec. held a handful of public outreach meetings and were provided input regarding the desires of the community to have a small, passive park during each: Public Meeting1: May 15, 2019 The top five elements voted for in this initial meeting were: natural areas, restrooms, sidewalks/trails, shade trees, and drinking fountains. With the projects goal, why was an alternative including these, and only these, amenities considered? Has DPR submitted proof of need for any of the amenities added to the design? Public Meeting 2: August 29, 2019 The same five elements from the first meeting were voted in again in the highest numbers, with the addition of picnic	Please refer to MR-12 (Parks Master Plan) for further details regarding the County's need for parkland in the Alpine Community. Please also refer to the response to comment O3-4 for a discussion of the alternatives analysis. No changes to the Draft EIR are needed.

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	shelters. This theme continues in other responses as the main thing 95% of participants agreed on, was that enjoying nature/outdoors was how the new park should benefit the community. This focus on nature and the outdoors as expressed through DPR's own public outreach is not showcased in the design, nor the DEIR. Once again, a proper alternative with the feedback from the community should have been analyzed. One with a small, passive park. <u>Public Meeting 3: September 23, 2020</u> Meeting focused on the all-wheel park design, led by a third party and consisted of individuals who primarily lived out of town. This meeting proves that this park amenity will attract an expanded regional draw, increasing traffic and vehicle miles traveled to this location. <u>Public Meeting 4: January 14, 2021</u> Only 6% of the comments recorded from this meeting were in support of the proposed design. Many of the comments expressed concerns that have NOT been addressed in this DEIR. How were these comments/concerns considered in the creation of the DEIR and planning process for the park? Why was the design not reconsidered when hit with such criticism? <u>Alpine Community Planning Group Special Meeting: April 6, 2021</u> This meeting was led by the ACPG, but a representative of DPR was present. 20 people showed up to speak, only 2 were in support of the park design. With 18 individuals showing up to express concerns and disapproval, was this public input considered by DPR in anyway? If so, they did not show it, as no major changes were made to their design. <u>Meetings with Board of Supervisor Staff: June 2021</u> Meetings were held with representative of Preserve Alpine Heritage, and staff of the Board of Supervisors to speak to others outside of DPR due to the departments lack of response to previous feedback.	

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I48-9	Overall, there has been public outrage surrounding this park's design and future environmental effects since it's first public proposal. DPR has been told many times what the community wants, so why was a small, passive park not included in the alternatives? Can it be added and properly analyzed to provide an alternative that would still meet project objectives and have the smallest environmental impacts? What other locations were considered for this park? Why were they not used, and can they be disclosed to the public?	The commenter's preference for additional alternatives is noted for the record. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to the portion of the comment about a passive park alternative, please refer to MR-10 (Passive Park Alternative) for more information. No changes to the Draft EIR are needed.
I48-10	**Conclusion** I believe that this project has been overbuilt. The project purpose, to provide Alpine with a place to recreate, can be done in a variety of ways, but DPR has only planned and moved forward with its idea, not considering outside input. I would like to see the EIR show evidence of a need for the size and many amenities that the park includes. I would also like to see DPR revise its project alternatives to include the use of feedback from the public, including their own outreach efforts. I feel that it is rare for a community to reject an "improvement" such as a park. This rejection is directly related to the value of the land in its present state, as well as the lack of understanding that DPR has for both the project location and it's intended audience. I look forward to seeing my many questions addressed in the EIR and appreciate the opportunity to provide feedback.	See the response to comment I48-9. The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I49: Warner Recabaren, November 15, 2021

Comment#	Comment Text	Response
I49-1	The 'Travis Mega Sports Park' proposal being railroaded into reality ranks as the second greatest boondoggle in California's history. We wanted a small regional park. Despite a DECLARED DROUGHT (and it is LONG TERM) most of approximately 27 acres will be covered in grass. The DEIR report is clear that the area is a non-permeable basin (a unique paleontological feature dating to the Lusardi time!) can not accept stormwater OR THE	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for a reduced scope alternative is noted for the record. Please see MR-10 (Passive Park Alternative). Please refer to Section 4.7, *Geology and Soils*, of the

Comment#	Comment Text	Response
	ADDED IRRIGATION of 16 + MILLION GALLONS for irrigation that must be brought in with new infrastructure along with new brought in sewage infrastructure.	Draft EIR for an overview of the existing geologic conditions and the Geotechnical Evaluation (Appendix F of the Draft EIR). Appendix F identifies the Lusardi Formation within the geology of the site vicinity. Appendix F also provides various recommendations for the design and construction of the project. Based on a review of the referenced background data, subsurface exploration, and geotechnical laboratory testing, Ninyo & Moore noted that construction of the proposed improvements is feasible from a geotechnical standpoint. See the response to comment O2-18 for additional information. No changes to the Draft EIR are needed.
I49-2	The report glances over the damage to the UNIQUE GRASSLAND and ENGLEMAN OAKS that are the purpose of the Wrights Field Preserve by the newly introduced water spreading and killing the trees and converting the grassland.	Please see MR-3 (Native Grassland Impacts). As presented in Section 4.4, *Biological Resources*, of the RS-Draft EIR, **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures** would be implemented to minimize and avoid potential impacts on Engelmann oaks resulting from the project and **MM-BIO-10: Native Grassland Mitigation** would be implemented to minimize and avoid potential impacts on native grassland. No changes to the Draft EIR are needed.

Comment Letter I50: Ronald Ripperger, November 11, 2021

Comment#	Comment Text	Response
I50-1	Ms. Prowant, my wife and I live in Alpine in the Alpine Heights region about 3 miles from the proposed park site. We moved here to get away from the "City" and have some part of rural America and to enjoy a bit more seasonal weather. First of all, we don't know all of the history of why Wright's field which is a lovely, peaceful place to walk and enjoy nature is now going to have a large portion of it turned into a busy park. Having a background and strong expertise in Environmental from my previous life it is clear to me that the Initial Study should have turned up many concerns.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's concern for Wright's Field is noted for the record. More information can be found in Section 4.2, *Agriculture and Forestry Resources*, of the Draft EIR and Section 4.4, *Biological Resources*, of the RS-Draft EIR. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I50-2	Traffic as you know is always a big deal and the impacts on any community including the roads and of course noise and emissions pollution. The car pollutants alone for our neighborhood is in direct contrast to your Zero Emissions Initiative I keep receiving emails on.	Please refer to Section 4.17, *Transportation and Circulation*, of the Draft EIR for an analysis of potential traffic impacts and their management. No changes to the Draft EIR are needed.
I50-3	We have enough noise and pollutants from the constant barrage of private planes that use Alpine skies as their practice area each and every day already and don't need to cultivate any more. Lighting if there will be any increases the light pollution in our neighborhood which is not desirable.	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed.
I50-4	And, of course, any demand for water that this park will require sure doesn't fit in with our current "climate" of poor water planning on a State level which has left us once again in a "drought". I'd sure like to see the "will serve" letter from Padre Dam Municipal Water District on how they will be able to serve water for your Project. With all the trauma from everyone on "Climate Change", even though the climate has been changing since the beginning of time on our earth, won't the Project add to that carbon impact on several levels?	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, as well as MR-15 (Water and Wastewater), which discuss the water supply and service boundary of PDMWD. Also see the response to comment O8-58. No changes to the Draft EIR are needed.
I50-5	And, if restrooms are to be included in the Project I will lay a bet on the probability of homeless people coming to Alpine for the lovely facilities and nearby brush for living in. I'm sure the residents who live in the immediate neighborhood such as both the Old and New Palo Verde Ranch will not be amused. Also, whether or not the Project has the potential to add to the crime in the area could end up being a factor.	This comment suggests that the project would result in an increase of homeless encampments in the project area. The Draft EIR acknowledges that an increase in visitors could result in an increased demand on police protection services. Recognizing this, events that require police and emergency services planning would continue to be coordinated with the County Office of Emergency Services to establish safety protocols. Also, the park will include a live-on park host, maintenance staff, and regular park ranger patrols, which would be part of the park's operating plan, with the authority to evict any unwanted park occupant. No changes to the Draft EIR are needed.
I50-6	And, finally, the initial cost and long term maintenance costs for the Project will need to be paid by someone. I know who part of that someone will be…My vote is no park if I could have the	This comment expressing opposition to the project is noted for the record. No changes to the Draft EIR are needed.

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	power to change things. Leave Wright's Field alone and keep it natural. Sincerely, Ron & Bobbi Ripperger.	

Comment Letter I51: Charles Roberts, October 7, 2021

Comment#	Comment Text	Response
I51-1	Anna, this is Charles Roberts, I live out in Alpine. I received a mailer/flyer for you guys wanna go ahead and put in a park down in a rural area and I don't agree with it.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This comment regarding the commenter's opposition to the project is acknowledged. No changes to the Draft EIR are needed.
I51-2	I think it's a cr*ppy location and I think it needs to be on the main street and I'd like to ask you have we considered the property that the Grossmont Union High School District purchased that they're not putting a high school on and maybe implementing it in that area where all the services are there and the main road, Alpine Boulevard, is there and then maybe when a high school comes they can plug into that. It sounds like money better suited. Where you're putting it, I've lived in Alpine 30 years, and it's not the location for what you guys, I don't know how you guys pushed this through, but it's horse sh*t and everybody knows it, except for everybody that doesn't live out here, it's a great thing. Well, I live out here and you need to put it on the main road instead of back in intricate housing development area, well it's not a development, but nonetheless. This is a nonstarter right from the get-go and why you have your name attached to this – I just need to know, are you voted in? Because if you're voted in, and I didn't vote you in, and I don't know if you're a public servant, you have to be, you work for the County and I'm just a concerned tax payer wanting to know why we're gonna put all the public on this small road, south grade, to get to this area. Not a good idea and I don't approve of it. I mean you can go ahead and push it through all you want to, but I'm not, I'm not happy with it. So, there you go, little input.	Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I52: Jody and Sharon Root, November 11, 2021

Comment#	Comment Text	Response
I52-1	We have been residents of Alpine for forty-three years and have been involved in community groups including AYSO, Bobby Sox (soft ball), Kiwanis, Little League, School Board, Et c. We walk Wright's Field three to four times a week and love the tr ails and views. Our son and his family also live in Alpine and his three children love hiking and climbing in Wright's field. When we heard about a small nature-based park adjacent to Wright's field we thought, if done well, it could enhance an already existing Alpine asset. When we saw the proposed plan, and the description and justification of the plan in the DEIR, we were appalled at the size and features of the project.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's concern for park size is noted for the record. No changes to the Draft EIR are needed.
I52-2	We lived across from the proposed park site and saw several attempts to develop the site with homes and a golf course and complex. All failed because of the biological, geological and historical significance of the property, which is down played in the DEIR . The property also failed percolation studies which is also not discussed in the DEIR . We were therefore very surprised that the County was advocating for this project considering the failures of the past proposed projects	Please refer to Chapter 5, *Cumulative Impacts*, of the Draft EIR for a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. According to Section 15130(b) of the CEQA Guidelines, cumulative impact analysis may be conducted using the *List Method*, which includes "a list of past, present, and probable activities producing related or cumulative impacts." Past projects are defined as those that were recently completed and are now operational. Please refer to Draft EIR Section 4.10, *Hydrology and Water Quality*, for more information about percolation. Due to the large amounts of natural and pervious surfaces on the project site, stormwater would generally percolate and recharge the groundwater table, similar to existing conditions. No changes to the Draft EIR are needed.
152-3	The Park would be an attractive nuisance for children walking and biking from school or home without the safety of bike lanes or sidewalks. The County is encouraging non-Alpine residents to travel to the site, thus increasing the traffic on a narrow rural road. There have been several fatalities on this road in the past. Alpine residents respect this area, specially Wright's Field, and we question whether non-residents would have the same reverence for this unique protected land and the endangered	Please see the response to comment I27-4 and MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	grass lands found there. This Park, as proposed in the DEIR, has a good chance of ruining the area and jeopardizing one of the unique recreational areas in East County	
I52-4	This is the wrong size, scope, and location for this Park and is not what the residents of Alpine want. The cost, both in construction, and maintenance, is not justified. Please reconsider the Park design and size and encourage the Park and Recreation Department to work with Alpine residents and organizations to design a better plan than the four alternatives stated in the DEIR	This comment expressing opposition to the project is noted for the record. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. Please refer to MR-10 (Passive Park Alternative) for further details.

Comment Letter I53: Mary Smith, November 15, 2021

Comment#	Comment Text	Response
I53-1	My questions and concerns in regards to the Alpine Sports Complex	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project.
I53-2	My first question is: From what source are you going to supply water to this High Impact Sports Park? My concern: As I'm driving home to Alpine on the 8 freeway I come upon a sign in bold letters "Severe Drought Conditions, Conserve Water!" So we are in a severe drought, will you decide to then use artificial turf?	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. No changes to the Draft EIR are needed.
I53-3	Artificial Turf will now replace Natural Grasslands and Native Shrubs that feed the wildlife. The artificial turf will bring no benefit to this park. There are field improvements going in at Joan McQueen Middle that will include artificial turf. Joan McQueen middle school is 600 to 700 feet away.	Please refer to MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation** for a summary of how the loss of native grasslands will be mitigated. Based on the analysis presented in the Draft EIR and revisions made in the RS-Draft EIR for biological resources, significant impacts on biological resources would be mitigated to a less-than-significant level. This comment does not raise specific issues related to the

Comment#	Comment Text	Response
	Don't you think this will be enough artificial material?	adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required.
I53-4	Who will benefit from this park? Having a drive to park out in an established residential area is not only concerning it's dangerous. First, the area is developed for residents commuting in and out of large developments on to a 2 lane road. Fire danger is first priority, Traffic and Noise. This Sports Complex has 300 parking spaces…. This Park is not for the local residents!	The park is intended to serve the local communities, which include residents that live in/near Alpine Village or other areas within the Alpine CPA and East County. This is a developed local County park and not a sports complex. There are other sport complexes in other areas of the region for the urbanized parts of the County. It is unlikely for residents/visitors of the urbanized area to drive to a facility in East County, because there are already parks with amenities, beaches, lakes, and other recreational options for those residents/visitors elsewhere. Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Noise and air quality impacts are considered in Sections 4.13, *Noise and Vibration*, and 4.3, *Air Quality*, of the Draft EIR. No changes to the Draft EIR are needed.
I53-5	What about the noise pollution and air pollution? We live in Alpine for the quite and fresh open air	Noise and air quality impacts are considered in Sections 4.13, *Noise and Vibration*, and 4.3, *Air Quality*, of the Draft EIR. Please also see MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the Draft EIR are needed.
I53-6	This is a established area it needs to be considered as a Natural Park not a Sports Complex. How does the Parks and Recreation Dept. justify building a Sports Park this size in an established area? If Parks and recreation department want to to build a park for Alpine. They should first use the money to repair and improve on the Parks already in place. I believe the Alpine Planning Group, Parks and Recreation and San Diego County should have done a better job contacting the residents of Alpine. It appears to be a bait and switch Park.	The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.

Comment Letter I54: Ron Smith, November 15, 2021

Comment#	Comment Text	Response
I54-1	Traffic, the roads leading to the park Tavern road and South Grade road are both two lane roads. A park of this size would definitely create heavy congestion	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the Draft EIR are needed.
I54-2	Sewer, putting a park on property that does not have sewer service or perk for a standard septic system is bad idea and a waste of tax payer money.	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR and MR-15 (Water and Wastewater) for information on wastewater and sewage treatment. Also see the response to comment O2-21 as well as MR-15 (Water and Wastewater). No changes to the Draft EIR are needed.

Comment Letter I55: Allen Stanko, October 24, 2021

Comment#	Comment Text	Response
I55-1	Many people in Alpine are opposed to the so-called improvements that are planned at Wright's Field. I guess you know better than the people who live in Alpine and you know what's best for us. This is our government at work... spending taxpayer dollars on whatever they want. Perhaps if you actually lived in Alpine for over 20 years, you would know what the people of Alpine want, and it's not something that will attract more out-of-towners to our quaint community. It is a shame that you are not held accountable to the people of Alpine and you are in a position to make such powerful decisions !	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I55-2	How about hanging out on Tavern Road, just south of Arnold Way, when students get out of school at Joan Mac Queen Middle School and have to walk along Tavern Road, where cars are	This comment regarding transportation impacts is acknowledged. Please see Section 4.17, *Transportation and Circulation*, of the Draft EIR, which concludes that adequate roadway capacity exists, to which the addition of vehicular

Comment#	Comment Text	Response
	going 50 mph and there is no sidewalk ! How about using some money to fix that situation ? ! ! !	traffic to/from the project would be minimal. Access to the park would be provided from the eastern side of the property as a new intersection leg of the South Grade Road and Calle de Compadres intersection and it would operate as an all-way stop-controlled intersection. In addition, the all-way stop would include a striped crossing for pedestrian, equestrian, and bicycle users to cross South Grade Road. The second driveway would be a new intersection at the southern end of the property and it would operate as a side-street stop-controlled intersection. No significant project-related impacts were identified, and no mitigation is required. The project would not have a significant impact on any of the study roadway segments and intersections under each of the studied scenarios. A DG walkway would also be implemented throughout the project site. Please also refer to MR-7 (Transportation and Safety). No changes to the Draft EIR are needed.

Comment Letter I56: Allen Stanko, November 20, 2021

Comment#	Comment Text	Response
I56-1	I addressed you that way because I did not know whether to put Mrs. or Ms. In front of your name. Things have gone crazy in this world and I wouldn't want to offend you in any way. Feel free to call me Allen.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.
I56-2	We here in Alpine do not want our Wright's Field turned into what the problem is in Ramona's Wellfield Park where homeless problems forced the park to close. If we do not have a new and-improved park to destroy, they will not come. And that's just the way we want it!	Please refer to the response to comment I34-4. No changes to the Draft EIR are needed.

Comment Letter I57: Nicole Stockmoe, September 30, 2021

Comment#	Comment Text	Response
I57-1	In response to the attached plans for a park in Alpine of this size, I adamantly oppose this plan. I live in the neighborhood across the street from this land, and I do not have one neighbor or friend that supports this proposal as it is. The "park" is not necessary for the residents of Alpine I believe people are being misled by it being called a "park" in the first place. This proposal is for a sports complex, please call it what it is	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's opposition to the project is noted for the record. No changes to the Draft EIR are needed.
I57-2	This is going to disrupt many lives of the residents. those who live nearby will be impacted with additional traffic, additional noise, additional people, trash, etc. We live in the back of Alpine for a reason, to get a way from all of this	This comment expressing opposition to the project is noted for the record. Direct and indirect impacts related to transportation and noise are listed in Sections 4.17, *Transportation and Circulation*, and 4.13, *Noise and Vibration*, of the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I58: Yolaine Stout, November 13, 2021

Comment#	Comment Text	Response
I58-1	Thank you for the opportunity to respond to the draft EIR for the Alpine Park Project, draft Environmental Impact Report dated September 2021. My concerns over the inadequacies in the EIR are many, however I am limiting my comments to those areas that most concern me.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the Draft EIR are needed.
I58-2	**1. Inadequate description and mitigation measures for the destruction of Tier I plant communities: Specifically, Valley Needle Grassland.**	Please see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation**. No changes to the Draft EIR are needed.
I58-3	4. **APM-1: Establishment of the Open Space Preserve** This paragraph is inadequate as it does not provide the size of the preserve. What is the actual size of the proposed preserve?	This comment is acknowledged. The open space encompasses approximately 70 acres. No changes to the Draft EIR are needed.
I58-4	**b. Table 4.4-4 and Figure 4.4-1** Both Engelmann Oak Woodlands and Valley Needlegrass Grassland are Tier I sensitive natural communities which	Vegetation mapping was updated in the summer of 2022 and presented in the RS-Draft EIR. Botanists mapped the boundaries between native and nonnative grasses by walking these

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	require a 2:1 mitigation ratio. In Table 4.4-4 it was determined that only 13.86 acres of "Tier I" communities existed. This is simply untrue and therefore inadequate. The areas marked brown in the legend on Figure 4.41 indicate large swaths of "non-native grassland." These areas appear to be grossly exaggerated in size presumably for the purpose of underestimating the total acreage of the native grassland area. Non-native grasses occur in all native grasslands. In the proposed park area, "non-native grasses" do not occur in such large swaths. What measurements or methods were used to determine non-native grass communities vs native grasses? Were these measurements or methods applied to all the brown indicated areas in Figure 4.41? In excluding "non-native grasslands" from native grasslands, the truer estimate of the size of the native grassland is 18.55 acres. This satellite view with mapped overlay shows area of native grassland to be impacted: tinyurl.com/area-of-native-grassland . Therefore Table 4.4-4 should indicate that 37.1 acres would be needed to mitigate for the loss of native grasslands rather than 27.73 indicated. Regardless of size, the bigger problem is that there are no equivalent or higher quality native grasslands in San Diego County. This has been determined by multiple agencies and biologists including the Department of Planning and Land Use for the County of San Diego who, in a letter dated 2/20/2009 in regard to a proposed high school for this site which is in the Wright's Field Pre-Approved Mitigation Area (PAMA) and adjacent to Wright's Field Preserve, stated "Due to the significant and not mitigable impacts to biological resources for Alternative B (Wright's Field) and the direct implications to the County's Multiple Species Conservation Plan, the County cannot recommend that this site be chosen for such an intensive land use." How was the determination made that this rare resource is now -10 years later – mitigable? Where is the supposed equal or better quality offsite native grassland located?	boundaries with a submeter accurate global positioning system unit. Mapping was conducted per the Vegetation Classification Manual for Western San Diego County; areas with greater than "trace" (defined as 5% cover) cover of needlegrass (*Nassella* spp.) were mapped as a needlegrass grassland (e.g., *Nassella pulchra* Association). Areas with less than 5% cover were mapped as a nonnative grassland. These criteria were used when mapping grassland vegetation initially in 2019 and during subsequent review and refinement of the mapping that occurred during additional surveys on the County's parcel. The proposed high school envisioned in the 2009 Draft EIR for High School Number 12 (ICF 2009), was more than twice the size of the park proposed at 50.6 acres compared to approximately 25 acres for the project. In the site plan for that project, there were also proposed educational facilities directly adjacent to and within a few feet of the eastern border with Wright's Field, whereas in the project, no facilities are proposed for 600 to 800 feet from the Wright's Field Preserve with the County Alpine Park Preserve between Wright's Field Preserve and the local Alpine Park. Because the 2009 high school project is substantially different in terms of size, bulk, configuration, the conclusions in the two Draft EIRs are justifiably different in terms of the edge effects expected on Wright's Field. See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources. No changes to the Draft EIR are needed.
I58-5	**2. No offsite Project Alternatives provided:**	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to

Comment#	Comment Text	Response
	ES-4 Summary of Project Alternatives All alternatives described in the draft EIR are either onsite or no project. No offsite alternative was provided despite County Parks saying at several public meetings during 2018 in Alpine that there were 10 possible sites for a public park in Alpine – not including the currently proposed site. One alternative is actually an enlarged proposal with added sports complex that would have even greater environmental impacts. How is this consistent with CEQA § 21002 "that requires feasible alternatives which would substantially lessen the significant environmental effects of such projects?" The "Reduced Project Alternative" is inadequate as it only reduces the project area by 20%.	the project objectives. Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative that was added to Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the Draft EIR are needed.
I58-6	**3. No impacts provided for possible sewer extensions.** **Page 3-3** states: "For utilities, the project would either connect to the existing sewer system or include a septic system to serve the restroom facilities, administration facility/ranger station, and volunteer pad. If the onsite connection to an existing sewer line is the option chosen, it will connect to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard." In other words, there appear to be three alternatives provided, but impacts are only given for one of them – the onsite septic and leach field treatment system. What are the impacts of the sewer extension? What is the length of the sewer connection to the proposed park from Alpine Blvd?	Please see the response to comment O2-21. Please also refer to MR-15 (Water and Wastewater). The additional sewage to be treated by SDCSD is within the available capacity; no adverse effects are expected either with regard to the treatment plant or nearby residents. If necessary, the design and length of the sewer connection will be assessed and reviewed prior to construction. No changes to the Draft EIR are needed.
I58-7	What are the noise and traffic impacts?	The information sought in the comment can be found in Sections 4.13, *Noise and Vibration*, 4.17, *Transportation and Circulation*, 7.3, *Growth-Inducing Impacts*, and 4.3, *Air Quality*, of the Draft EIR. As indicated in this Final EIR, noise impacts would be less than significant with incorporation of **MM-NOI-1** through **MM-NOI-3**. Traffic impacts were determined to be less than significant, and no mitigation is needed.

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		Please also see MR-7 (Transportation and Safety) and MR-13 (Noise and Lighting) for more information on traffic and noise impacts. No changes to the Draft EIR are needed.
I58-8	What are the growth inducing impacts of such a proposal? What are the CO2 emission impacts?	The information sought in the comment can be found in Sections 7.3, *Growth-Inducing Impacts*, and 4.3, *Air Quality*, of the Draft EIR. According to the analysis in Section 4.8, *Greenhouse Gas Emissions and Climate Change,* GHG emissions from operation of the project would have a less-than-significant impact on the environment. No changes to the Draft EIR are needed.
I58-9	Exactly where would the proposed sewer line go from Tavern Road? (I had requested this in my NOP comments). Will it go along private roads, through Joan MacQueen Middle School and the Wright's Field Preserve which would be the shortest route from Tavern Road?	Please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). As stated in the Draft EIR, an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the proposed site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. The existing sewer line is served by SDCSD. No changes to the Draft EIR are needed.
I58-10	What is the length of that sewer connection to the proposed park? What are the noise and traffic impacts?	Please see the response to comment I58-6. Please also see MR-7 (Transportation and Safety) and MR-13 (Noise and Lighting) for more information on traffic and noise impacts. No changes to the Draft EIR are needed.
I58-11	What are the growth inducing impacts of such a proposal? What are the CO2 emission impacts? How will the destruction of Tier I habitats along that route be mitigated? The draft EIR is grossly inadequate in this regard.	Growth-inducing impacts, emission impacts, and biological impacts are discussed in Sections 4.3, *Air Quality*, and 7.3, *Growth-Inducing Impacts*, of the Draft EIR and Section 4.4, *Biological Resources*, of the RS-Draft EIR. To mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its Biological Mitigation Ordinance to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided per **MM-BIO-9** and **MM-BIO-10** within the open space and/or within offsite location(s), as summarized in Section 4.4, that would include habitat-based mitigation and restoration of grassland. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I58-12	**4. Conflicting and therefore inadequate impacts provided for septic and leach field options.** **Page 4.7-19** states that "The second option [other than connecting to existing sewer lines far from the project location] would be a septic system with a filter treatment system and treatment leach field. The location of the proposed leach field on Figure 4.4-4, is in the dry creek headwaters for a tributary through Wright's Field Preserve to Alpine Creek which drains into El Capitan Reservoir, one of San Diego County's largest drinking water reservoirs. Has Padre Dam commented on this? If so, the comments are not included in the EIR. How is this location consistent with the San Diego County Department of Health requirement that leach lines be located "50 feet from the top of the drainage bank" ? See page 9 of Onsite Wastewater Treatment Systems (Septic Systems) Permitting Process and Design Criteria. "The initial issuance of a hazardous waste facilities permit pursuant to Section 25200 of the Health and Safety Code to an offsite large treatment facility, as defined pursuant to subdivision (d) of Section 25205.1 of the Health and Safety Code." Has such a facilities permit been obtained?	Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR as well as MR-15 (Water and Wastewater) for information on the septic system to serve the facilities and wastewater treatment. Also see the response to comment O8-80. No changes to the Draft EIR are needed.
I58-13	**Figure 4.4-1** and other maps show only the leach fields and a short sewer line. It does not show the treatment facility or source of the sewage. **Concept Plan Figure 3.2** Shows one bathroom (marked 3) as at the far south of the proposed park while the leach fields from figure 4.4-1 are in the northernmost part of the proposed park. Where will the sewage from this bathroom go? What is the true length of the sewer line and what are the all the associated impacts from the construction of such a long sewer line onsite? What is the actual length of the sewer line from the leach field area to restroom 2?	Please see the response to comment I58-9 above. No changes to the Draft EIR are needed.
I58-14	**6. Inadequate Water Supply Assurances. No comments from responsible agencies** CEQA states in § 21104. STATE LEAD AGENCY; CONSULTATIONS PRIOR TO COMPLETION OF IMPACT that (a) Prior to completing an environmental impact report, the state lead agency shall	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, as well as MR-15 (Water and Wastewater), which discuss the water supply and service boundary of PDMWD. Also see the response to comment O8-58. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
	consult with, and obtain comments from, each responsible agency, trustee agency, any public agency that has jurisdiction by law with respect to the project.	
I58-15	**3.4** The draft EIR states, "Water supplies would be provided by Padre Dam Municipal Water District" and "Water demand is anticipated to be approximately 16,471,273 gallons per year." Where are the comment letters from Padre Dam, the San Diego County Water Authority and other responsible agencies assuring the public that 16,471,273 gallons of water per year are available for a new park?	Please see the response to comment I58-14. For additional information on water supply assessment, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). No changes to the Draft EIR are needed.
I58-16	**7. Inadequate estimate of maximum daily construction emissions** **Table 4.3-5 Estimated Maximum Daily Construction Emissions** shows maximum daily emissions for "sewer line installation" for 2022 and 2023 yet nowhere in the EIR is the length of sewer lines for any of the three stated options provided. How can construction emissions be estimated if the length of those lines are not known? How does the public or responsible agencies know if those construction emission thresholds have been exceeded or not?	As shown in Table 4.3-5, the project's Sewer Line Installation and Drainage/Utilities/Subgrade construction phases would not exceed the adopted County of San Diego daily air quality thresholds. Therefore, construction emissions would not exceed the thresholds with incorporation of the sewer line installation. No changes to the Draft EIR are needed.
I58-17	**8. Inadequate mitigation measures provided for significant impacts from construction on inappropriate soils.** According to CEQA Appendix G, a project will have significant impacts if the project would result in any of the following: 2.) Result in substantial soil erosion or the loss of topsoil. 4.) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. 5.) Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater? 6.) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Below I examine each of these significant impacts:	This comment summarizes the criteria from Appendix G of the CEQA Guidelines for determining significance of impacts from geotechnical and soil conditions. Individual responses that address each of the criteria listed are provided in the comments below. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I58-18	**2.) Result in substantial soil erosion or the loss of topsoil** **4.7-13** The draft EIR states that the project would not result in substantial soil erosion or the loss of topsoil and that no mitigation would be required, yet the recommendations provided by the geologic consultant on pages 4.7-15 and 4.7-16 state that a minimum of 1-2 feet of topsoil below structural buildings, retaining walls and exterior pedestrian concrete flatwork be removed in order to potentially reach suitable, stable soils. In addition, in order to create level areas for ball fields, ball courts, parking areas and many other features, much topsoil must be removed.	Please see MR-14 (Geology and Soils). The project civil engineer will address erosion and loss of topsoil used for landscaping purposes through stormwater BMPs. No changes to the Draft EIR are needed.
I58-19	The park concept plan also shows numerous trees will be planted. Trees do not grow in clay (which is why it is naturally a native grassland and not a forest.) A substantial amount of clay (topsoil) must be removed and replaced with soil that will support trees and their root systems. *The draft EIR is woefully inadequate because it will result in the loss of massive amounts of topsoil loss due to grading, excavation, digging and removal involving the vast area of the concept park plan. The draft EIR does not describe the estimated amount of topsoil that will be lost due to these activities*. How much topsoil will be removed?	Please see MR-14 (Geology and Soils). The project civil engineer will address erosion and loss of topsoil used for landscaping purposes through stormwater BMPs. No changes to the Draft EIR are needed.
I58-20	What are the traffic, noise and emission impacts of such removal? Additionally, the clay contains massive amounts of stones and boulders. What are the traffic, noise and emission impacts of stone crushing and removal?	See MR-13 (Noise and Lighting) for more information on noise impacts. Stone crushing is not part of the construction process; should that be required, it would be handled off site. No changes to the Draft EIR are needed.
I58-21	**4.) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.** Bosanko Stony Clay which underlays almost the entirety of the proposed park area is highly expansive. Expansion rates at sample test sites performed by Ninyo & Moore indicate expansion indices in 3 of 5 sites as high (94-105). The 2 tests with medium expansion indices (TP 15 and TP 11) are on the outer edges of the proposed site. **4.7.2.3** In section 4.7. on	Please see MR-14 (Geology and Soils). The Geotechnical Evaluation discusses the presence of expansive clay materials at the site and the difficulties the contractor would have with working these materials. According to Appendix G of the CEQA Guidelines, impacts would be considered significant if the project is located "on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property." Section 4.7, *Geology and Soils*, of the Draft EIR states that "the project would be located on expansive soil, as defined in Table 18-1-B of the Uniform

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	Geology and Soils of the draft EIR, it is stated, "Shrinking or swelling of foundation soils can lead to *damage to foundations and engineered structures,* including tilting and cracking," due to the expansive soils (Bosanko Stony Clay) that underlie the entirety of the project area. The evaluation of the soils by Ninyo & Moore who tested the topsoil agreed that the soil "possesses a medium to high potential for expansion." In addition, the USDA describes Bosanko Stony Clay of all slopes as having **"severe"** limitations for septic tank effluent disposal and **"severe"** shrink swell and runoff for a public sewerage system. Also, according to this same report, Bosanko Stony clay has "severe" limitations for play areas, picnic areas and even paths and trails. Despite the testing for expansive soils by the County's own consultants, Ninyo & Moore, as reported in their Geotechnical Evaluation and despite the USDA's own findings for Bosanko Stony Clay and despite the draft EIR stating on page 4.7 that "the project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and does not conform with the Uniform Building Code, the draft EIR boldly declares on page 4.7-18 Threshold 4: *"The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property."* And that "***No mitigation is required."*** This is misleading and false.	Building Code, but would not create substantial direct or indirect risks to life or property. Impacts would be less than significant." No changes to the Draft EIR are needed.
I58-22	The draft EIR indicates that it will follow the recommendations set forth by Ninyo & Moore in order to "diminish potential risks" and to ensure the project would not exacerbate existing onsite conditions or *the existing expansive soils onsite*. Is "not exacerbating existing conditions" and "following recommendations" considered mitigation? Ninyo & Moore recommend that only 2 feet of topsoil be removed under structures, yet their own test pits do not perc even at 3 feet due to the high clay content. Joan MacQueen Middle School, which was built on the same Bosanko Stony Clay not far from the proposed park site, levelled the entire area down to 376ifficu. 15' on their eastern edge. They STILL did not reach below the clay. To this day, the school must put up with boggy lawns and	Please see MR-14 (Geology and Soils). No changes to the Draft EIR are needed.

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	playing fields, poorly growing trees and other clay related issues. I can't imagine a worse location in Alpine for an active park. Does the County realize the cost alone of removing vast amounts of clay, rocks and boulders on the site? Will taxpayers be willing to cough up even more millions for this incompetent boondoggle? What are the financial impacts of this project?	
I58-23	**5.) Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater.** As stated the project is underlain by Bosanko stony clay, which is rated as "severe" for septic tank effluent disposal due to permeability rate (USDA 1973). On page 4.7-20, the draft EIR declares that the project would *not* involve soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems yet one of the stated options for sewage disposal is an onsite wastewater treatment area involving pipes and leach fields. The location of the leach field and connecting sewer line is shown on **Figures 4.4-2 and 4.4-3.** In the Geotechnical Evaluation in Appendix F, Volume 2 of the draft EIR, consultants Ninyo & Moore conducted multiple percolation and infiltration tests (7) throughout the site. See Appendix C pages 1-7 of their report. The location of the leach field appears is at Test hole IT2. Even at a depth of 3.8 feet, water did NOT percolate or infiltrate at 14 of 18 counted 10 min intervals. The remaining 4 intervals showed very minimal infiltration or percolation. Clearly this site is wholly inadequate for a leach field! Similar results were obtained by ALL of the remaining tests throughout the proposed park area. These results are consistent with multiple percolation tests conducted on this site since the 1970s. Again, the draft EIR defers mitigation to complying with "existing regulations" and would not result in a significant impact related to onsite soils, while at the same time declaring that no mitigation is required! Existing regulations already state that septic systems cannot be built in soils that do not percolate.	Please see MR-14 (Geology and Soils). No changes to the Draft EIR are needed.

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	Doing so would obviously result in raw sewage build up that would dangerously affect health, property and wildlife. Why is the septic option even being considered for this site? Is the true purpose of this "park" location to expand growth inducing sewer lines?	
I58-24	**6.) Directly or indirectly destroy a unique paleontological resource or site or *unique geologic feature.*** The Conservation Element of the County of San Diego General Plan also provides policies for the preservation of unique geological features. This is such a site. According the 1980 Geologic map of the Alpine Quadrangle, San Diego County, California, USGS. Wright's Field including the site of the proposed park is marked. KTf. KTf is described as "Older [= Pleistocene or Pliocene] Alluvium (poorly sorted, boulder alluvium with distinctive granite 'Kcm' [=Corte Madera Granite] and gabbro clasts, possibly debris flow deposit; dissected remnants of once more extensive deposit). "Alluvium" is a deposit of clay, silt, sand, and gravel *left by flowing streams in a river valley* or delta. Distinctive granite is different from the common granite seen throughout Alpine and in the hills surrounding Wright's Field. Dr. Patrick L. Williams, geologist, who commented on this EIR notes in Volume 2 Appendix B under Notice of Preparation also notes. " The uniqueness of the site had captured my attention. Not only is the park area a striking native grassland, nearly devoid of woody "chaparral" species, but the entirety of the property's grassland is decorated with exotic boulders of a very large and very ancient riverbed, which, per SDSU faculty cannot be associated with a provenance because the mountains of their origin have long since disappeared. The field itself was an active riverbed until about eighty-million years ago, at which time the river's flow was captured into Sweetwater Canyon. Such a site is not only unique in southern California, it is extremely rare in the world. The County property and Wright's Field is a geological heritage site and deserves to be formally recognized as such."	The County has a list of Unique Geologic Features and a list of Potentially Unique Geologic Features. This site is not currently included in those lists. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.

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	Any reasonable person can observe that the rocks in Wright's Field are not rough field rocks, but tumbled, smooth river rock. They can also observe that there are many different kinds of rocks that are distinctive from the predominant exposed magma granite boulders and rocks in neighboring hills.	
I58-25	The presence of vast quantities of clay is consistent with Wright's Field and the proposed park site being that of an ancient riverbed. Additionally, the shape of this area that consists of these kinds of rocks and clay shown on government maps take the form of a river. The draft EIR focuses on potential impacts to paleontological resources, but neglects to examine the area as a unique geologic feature. Why was this legal consideration completely ignored? The draft EIR is wholly inadequate in examining the site as unique geologic feature.	Please see the response to I58-24 above. No changes to the Draft EIR are needed.
I58-26	Bottomline: Rather than DESTROY this incredibly unique biological, geological, archaeological and historical resource, the County of San Diego has an obligation to research, protect and celebrate it. The County of San Diego Parks and Recreation has in its mission statement to also "preserve significant natural resources." Why is it attempting to destroy one for the sake of the other? At what cost? No financial feasibility study was included. The EIR is wholly inadequate and – to be frank – egregious. Due to constraints, I do not have time to point out the numerous other inadequacies. It is my hope and the hope of thousands who have come to cherish Wright's Field over the years that the Board of Supervisors does the (W)right thing and denies this project. Please keep me notified of all future meetings, publications and reviews of this project.	The commenter's opinion regarding the adequacy of the Draft EIR is noted for the record. Impacts on biological, archaeological, and geological resources are disclosed within Sections 4.4, *Biological Resources*, 4.5, *Cultural Resources*, and 4.7, *Geology and Soils*, of the EIR. The County appreciates the comments submitted on the Draft EIR. No changes to the Draft EIR are needed.

Comment Letter I59: Darcy Stumbaugh, November 15, 2021

Comment#	Comment Text	Response
I59-1	Dear Anna Prowant, I'm contacting you to strongly oppose the current plans for a 25 acre park on Wright's Field in Alpine. I am	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San

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	a part-time resident of San Diego and have been visiting Wright's Field for over 20 years to enjoy the rare plant community and wildlife diversity. It is already a destination park for me. The county acquisition of acreage for a buffer and gateway access to this treasured ecosystem was hailed as a success at the time, and we've waited a long time for this park to be completed- an area for parking, and some picnic tables and shade for visitors to Wright's Field.	Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for a passive park is noted for the record. Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I59-2	That is all that is desired for this park. It was thought that the county's acquisition would help protect the portion of Wright's Field that has intact native plant communities, not pose a threat to it with concrete construction and irrigation and increased human activity.	The County would be preserving an approximately 70-acre parcel of land—Alpine Park Preserve—adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional details. In addition, to mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its Biological Mitigation Ordinance to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided per **MM-BIO-9** and **MM-BIO-10** within the open space and/or within offsite location(s), as summarized in Section 4.4, *Biological Resources*, that would include habitat-based mitigation and restoration of grassland. No changes to the Draft EIR are needed.

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I59-3	The current proposed park would have devastating negative impacts to sensitive wildlife and plants in Wright's Field, this natural community is the last of its kind and must be protected and restored. All of the proposed amenities are things that can be built, or already exist and are in dire need of maintenance, at existing nearby county parks, and the financial interests of a few land developers should not be confused with the needs of the community. Wright's Field is my favorite wild space to visit in San Diego county, it has been for over 20 years, I care immensely for the wildlife and botany in that space, and it is not in any way possible that accurate wildlife and botanical surveys of the area would find that the current proposed park would cause anything but irreversible damage to the existing ecosystem there, which includes the endangered San Diego thornmint and Hermes copper butterfly.	Please see the response to comment O2-24 and MR-2 (Indirect Impacts on Wright's Field). Neither San Diego thornmint nor Hermes copper butterfly are expected to occur within the County's parcel, including within the proposed development footprint of the active use park. No changes to the Draft EIR are needed.
I59-4	Outside of my area of expertise I would also recommend including the perspective of the Kumeyaay tribe, who have pre-existing claims to the land, and the historical use of that land by Spanish missionaries and as part of the Camino Real, especially when proposing excavation that would no doubt reveal artifacts of cultural and historical significance. Thank you for considering my comments.	Please refer to Section 4.18, *Tribal Cultural Resources*, of the Draft EIR for additional information on applicable mitigation measures regarding cultural resources such as **MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan**, **MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction**, **MM-CUL-3: Conduct Archaeological and Native American Monitoring**, and **MM-TCR-1: Conduct Native American Monitoring**. No changes to the Draft EIR are needed.

Comment Letter I60: Kyle Thomas, November 16, 2021

Comment#	Comment Text	Response
I60-1	I think a small nature park should be presented as an alternative to a huge sports complex. Most Alpine residents are against the park as it is currently planned.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for a passive park alternative is noted for the record. Please also see MR-10 (Passive Park Alternative).

Comment Letter I61: Debbie Van Hyfte, September 3, 2021

Comment#	Comment Text	Response
I61-1	Please remove my name from your email list; I've moved out of state.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I62: Virginia Walker, November 12, 2021

Comment#	Comment Text	Response
I62-1	I am very much against the park you have planned for Alpine. It seems you are just throwing everything into this park and not taking any consideration of what the community of Alpine really would like in this area. We don't need playing fields in grass or turf. The ones we have are not used, so why are we adding more? We have fields at the Alpine School in town that don't seem to be used much. We also have fields at all our schools. No we don't need any more fields.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's opposition to the project is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I62-2	Having a skate park at this location is crazy. We don't need this big of a skate park and not in this location. The skate park at Kennedy Park in El Cajon is not very big and it is in a location that is safe to access, and doesn't bother the neighborhood. The location of this skate park in Alpine would not do that. It would create noise and traffic issues for the neighborhood. There is a piece of land for sale right now, right next to the community center. There would be plenty of parking there and an easy access for the kids. No, it would not be as big or elaborate as the one you have planned, but it would be safe for the kids. We don't need big and elaborate for our small community. We just need something safe for our kids.	The commenter's opposition to the all-wheel park is noted for the record. No further response is required. No changes to the Draft EIR are needed.
I62-3	I also, like many others that live in Alpine, don't believe in having you dig up our grasslands. There is very little of this type of land left in our area. It would be a lot smarter to set the area up in a	The commenter's preference for a passive park alternative is noted for the record. Alternative 5 – Passive Park Alternative has been analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*.

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	nature park that can be walked with signs that tell about the area and its history. People would come to walk and relax and enjoy nature, and this park would be next to a nature preserve. Wow, what an idea. Think of the learning that could take place. Our Alpine Community would benefit from this type of passive park, since eventually everything in our area will be built on. What a wonderful place to come and walk, or ride your horse on trails, that is not far from home and would be a good place to relax.	Please also see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I62-4	Mr Anderson, first you ran your campaign on being truthful and honest which you haven't been. Also you made the comment that it would be a "park to take your grandkids to". Yes you would be able to say, " Hey Kids, I worked to get this park built. I destroyed native grasslands in doing so, and did so much digging and construction in the area, that the nature preserve next door has lost all its animals because there are too many people here. All the birds and creatures have had to find a better place to live." Won't your grandkids be so proud of you! Wouldn't it be a much better to say," Hey kids, let's go visit the park near Wrights Field! We can walk the trails and look for native species that are hard to find anywhere else in San Diego. I worked to keep this area as natural as possible so that you and your children can come and enjoy this area to see how it once was a long time ago." So which do you think is a better legacy to leave behind? We don't need these elaborate parks, we need nature to help us relax and shake off a hard days work. Not noise and cement.	The commenter's preference for a passive park alternative is noted for the record. Please see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I62-5	Please supervisors, do not push for this park. Here we are looking at turning all our lawns into desert landscapes because we cannot afford the water bill and you are looking at putting all this grass in that will have to be watered. What crazy thinking is that! People need the water not the grass. The Alpine community wants to keep its grasslands just like they are. It doesn't need any water.	The commenter's preference for a passive park alternative is noted for the record. Please see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.
I62-6	Yes create a park, but a native park. Keep our grasslands!	The commenter's preference for a passive park alternative is noted for the record. Please see MR-10 (Passive Park Alternative). No changes to the Draft EIR are needed.

Comment Letter I63: Chris Wiley, September 30, 2021

Comment#	Comment Text	Response
I63-1	We will get this out to Alpine Chamber members immediately	This comment is acknowledged and will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

Comment Letter I64: Patrick Williams, November 15, 2021

Comment#	Comment Text	Response
I64-1	Thank you for the opportunity to comment on the Alpine County Park (ACP) Draft Environmental Impact Report (DEIR). For background I hold a doctorate in Earth Science from Columbia University and a bachelor of science in Biology and Geology from Evergreen State College. I have lived in Alpine for 11 years. From 2014 to 2021 I served as a BCLT director and supervising land manager and director for operations for the Mountain Empire including Long Potrero Preserve and Clover Flat Preserve. During that time the majority of our habitat management work was reviewed annually by very senior staff at USFW and CDFW. I left BCLT board this year along with an employee (Jon Green) and another board member (Renee Owens) as a result of board conflicts over the size and active sports focus of the proposed ACP.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. This is an introductory comment regarding the commenter's background and connection to BCLT. No further response is necessary. No changes to the Draft EIR are needed.
I64-2	I have worked as a professional geologist for 30 years. I take a deep personal and professional interest in Wright's Field Preserve (WFP) and the County-purchased portion of the overall grassland landscape. The grassland is associated with the >80 million-year-old sedimentary Alpine Lusardi Formation (ALF). Amongst all known locations, the context and landscape of the Lusardi Formation is best preserved at the site of the proposed	Please see MR-14 (Geology and Soils). No further response is required. No changes to the Draft EIR are needed.

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	ACP. The ALF is the subject of an upcoming field trip of the San Diego Association of Geologists, and description of the Lusardi in Alpine as an entirely unique geological feature is outlined in an letter from Emeritus SDSU Geological Sciences Professors Dr. Patrick Abbott, Dr. Gary Girty and myself, provided by email earlier today. Conflicts in recognition of Lusardi on site, and lack of appreciation for the extreme difficulty and associated inflation of construction cost, storm-water management, erosion management, expansive soils management and flatwork replacement requirements and the cost of construction monitoring, materials handling, construction cost, and absence of investigation of the ACP site's geological uniqueness are substantial oversights. It is the presence and geological history of the Lusardi Formation that makes water infiltration difficult and generates a geological hazard in association with the nearly impermeable highly expansive clay soils of the site.	
I64-3	It was extremely disappointing to find no consideration in the DEIR of any alternative for a passive nature-based park, which has been the most strongly supported alternative in all County outreach meetings and polls. I implore the County to produce a final EIR that contains this option and that all Park options be taken to the Board of Supervisors so that they can choose a park that the community wants. I was particularly concerned that my detailed comments in a 1500 word response to the NOP input were discarded in a 34 word response (DEIR Volume I, page 58) concluding with an incomplete sentence fragment that I "expressed concerns regarding geology (as it relates to boulders on site)". The refusal to take highly challenging engineering site conditions seriously is a major failing throughout the history of this project, and continues to be at issue in this DEIR.	The commenter's preference for a passive park alternative is noted for the record. Please see MR-10 (Passive Park Alternative) for additional details regarding project alternatives. The Geotechnical Evaluation describes the laboratory testing conducted for the project. The landscape architect will review and evaluate the project landscape plans prior to project implementation. Please refer to Section 4.7, *Geology and Soils*, of the Draft EIR for an overview of the existing geologic conditions and the Geotechnical Evaluation (included in Appendix F of the Draft EIR) for additional information. Please see MR-14 (geology and Soils). No changes to the Draft EIR are needed.
I64-4	Please find below my letter responds to the following DEIR headings: 4.1 Aesthetics and Visual Resources 4.4 Biological Resources 4.7 Geology and Soils 4.8 Greenhouse Gas Emissions and Climate Change 4.13 Noise and Vibration 4.19 Utilities and Service Systems (Water; Connection to County Sewer; On-site Sewer Treatment 4.20 Wildfire	This comment is acknowledged. Responses to issues raised in each of the Draft EIR sections mentioned in the comment are provided below. No further response is required. No changes to the Draft EIR are needed.

Comment#	Comment Text	Response
I64-5	DEIR Section 4.1 Aesthetics and Visual Resources The ACP site is the Town of Alpine's most valuable publically accessible aesthetic and visual resource. As those of use who regularly visit the property know, dozens of groups meet at the County property, walking from South Grade Road to take family portraits and wedding photos. Photographers know the light and 50-mile-views provide light, local interest (Engelmann Oaks and grassland) and vanishing points for spectacular photography. It is immediately apparent that loss of Alpine's most valuable publically accessible visual resource is not mitigated in this DEIR. How does the DEIR meet Goal LU-2: Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character, and how does it meet Goal COS-11: Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized. In particular the view of the unique 80-million-year old Lusardi geology landscape seen below:  Photo 1. View west across ACP site from South Grade Road. *This view will be blocked by the park.*	Please see the response to comment O8-82. In addition, as shown on the "before-and-after" visual simulations provided in Draft EIR Section 4.1, *Aesthetics and Visual Resources*, with the exception of additional conforming vegetation, views of the project site from the surrounding vicinity would not be substantially changed. No changes to the Draft EIR are needed.
I64-6	Section 4.1.4.1 The principal public viewer group for this site are the residents of Alpine. How does the DEIR evaluate the sensitivity of public viewer groups is not the highest sensitivity as suggested at all outreach meetings and polls which all were	Please see the response to comment I64-5, above. No changes to the Draft EIR are needed.

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	majority in support of a passive nature-based park for this site? Section 4.1.4.2 Since the project will visually block and physically gate the most significant public San Diego County vista in Alpine, how does the project as planned not violate CEQA Appendix G section 1., 2., and 3., and the County of San Diego Guidelines for Determining Significance for Visual Resources (County of San Diego 2007) on page 91? How will the EIR and this project as proposed be able to mitigate the taking of Alpine's most beloved publicly accessible scenic view?	
I64-7	What detailed means does the ACP project use to mitigate the taking of nearly 65% of Project site Valley Needlegrass Grassland (VNG)? The total amount of VNG on County property is 22.1 acres (table 4.4-1). The amount of VNG proposed to be removed by park construction is 13.9 acres (table 4.4-3) thus the ACP project as proposed removes 63% of VNG on the County property and a net 22.3 acres of associated avian foraging habitat (Section 4.4-17 "Birds"). This is problematic since it is not possible to mitigate VNG by kind in the project area or sub-region. Has the County field-checked mapping of VNG? In our own reconnaissance of VNG, "nonnative" grassland (NNG) and "disturbed flat-topped buckwheat" (DFTB) habitat areas within the 25 acre ACP footprint, coverage of VNG is found to be substantial in many of the brown-shaded NNG and DFTB map areas illustrated on Figure 4.4-1 (DEIR Volume I page 159). Will the County update or redo this mapping to provide habitat evaluations that can be corroborated to be accurate?	Please see MR-3 (Native Grassland Impacts) **and MM-BIO-10: Native Grassland Mitigation**. Vegetation mapping was updated in the summer of 2022 and presented in the RS-Draft EIR. Botanists mapped the boundaries between native and nonnative grasses by walking these boundaries with a submeter accurate global positioning system unit. The County acknowledges that there is appreciable cover of native grasses within the flat-topped buckwheat stands on site. However, those stands are correctly mapped as flat-topped buckwheat due to the presence of greater than 5–10% cover of shrubs. The key to Stratum Classes identified in the Vegetation Classification Manual for Western San Diego County specifies that herbaceous communities must have less than 5–10% cover of shrubs. No changes to the Draft EIR are needed.
I64-8	The following questions arose during my reading of DEIR Section 4.7: • Is it legal to mitigate the taking of VNG by substitution of non-native grassland? • Is it legal to delay mitigation via MSCP for avian prey and nectar habitat take for sensitive species (e.g. Ferruginous Hawk) and protected species (e.g. Quino Checkerspot Butterfly)?	Please see MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation**. The County cannot and is not proposing mitigation for native grassland with nonnative grassland unless there is restoration of the nonnative grassland to native grassland because that would be mitigation "out of kind." Please also see MR-4 (Natural Resource Mitigation) and MR-5 (Additional Species Analysis). No changes to the Draft EIR are needed.

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I64-9	Have the total local and regional consequences of permanent removal of 22.3 acres of avian foraging habitat been studied (DEIR Volume I page 484), particularly for Ferruginous Hawk? For example has the effect of removing primary foraging habitat in the close vicinity of a substantial concentration of complementary nearby nesting resources along permanently flowing Viejas Creek just 600 meters away and permanently flowing Sweetwater River just 1600 meters away been studied in preparation of the DEIR? • Have hawk and falcon nesting populations and breeding success been evaluated in the ca. 50 acres of potential woodland nesting habitat that is located within 1500 meters of the proposed ACP?	The RS-Draft EIR includes a discussion of the relative importance of the potential impacts on various avian species groups, including grassland endemic or obligate avian species such as ferruginous hawk. Specifically, the availability of similar habitat for these avian groups in the immediate vicinity of the project has been included in the discussion in the RS-Draft EIR. Based on this review, the 18 acres of grassland impacts from the project represent approximately 14 percent of the total grasslands within the contiguous open space or preserved lands in the immediate vicinity of the project. These data are summarized in the RS-Draft EIR. Details are also provided for generalist avian species, woodland obligates, and avian species requiring scrub habitats. In addition, ferruginous hawk is a Covered Species under the MSCP and wildlife agencies have determined that conservation efforts being implemented as part of the MSCP will adequately conserve this species. Pre-construction nesting bird surveys will be conducted in accordance with the proposed **MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA** in the Draft EIR, including for hawks and falcons, prior to construction. Additional language requiring raptor surveys up to 1,500 meters has been added to the nesting bird mitigation measure in the RS-Draft EIR to minimize impacts on raptors. No changes to the Draft EIR are needed.
I64-10	Taking of native VNG habitat is communicated as a very serious matter in the County's own documents: "Native grasslands are now quite rare and occur [only] in the hills south of Poway, Wright's Field in Alpine, parts of Camp Pendleton, Ramona, and Rancho Guiejito east of Valley Center." Furthermore the County previously asserted that development of the site of the proposed Alpine County Park could not be mitigated for a high school recently proposed for the site of the proposed Alpine County Park: (DPLU/ DPW/ DPR dated 2/20/2009 "Due to the significant and not mitigable impacts to biological resources for Alternative B (Wright's Field) and the direct implications to the	Please refer to MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation** for additional information on native grasslands. Based on the analysis presented in the Draft EIR and revisions made in the RS-Draft EIR for biological resources, significant impacts on biological resources would be mitigated to a less-than-significant level. No changes to the Draft EIR are needed.

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	County's Multiple Species Conservation Plan, the County cannot recommend that this site be chosen for such an intensive land use. Study Area B is located within the County's Wright's Field Pre-Approved Mitigation Area (PAMA) and adjacent to Wright's Field Preserve, an integral part of the County of San Diego's South County Multiple Species Conservation Program (MSCP) Subarea Plan.").	
I64-11	How can the County justify its role in development of property that was not allowed to be developed for housing with far lower habitat loss and water and sewer needs or a high school with comparable loss of habitat (22.3 acres instead of 27 acres per 2009-02-20 County DEIR response for Alpine High School). The proposed 25 acre active use park will remain a divisive Alpine community and mountain region conservation focus for many years to come, particularly if the County moves forward with removal of 13 acres of VNG habitat and 22.3 acres of avian foraging habitat as planned for construction of a park centered on organized sports recreation in a town that is already blessed with several parks, abundant recreation opportunities and (if maintained) a more-than-adequate inventory of sports fields. A park of this size and impact, at a location that the County previously stated development could not be mitigated, is a glaring contradiction.	Please see the responses to comments O8-24 and I64-8. No changes to the Draft EIR are needed.
I64-12	DEIR Section 4.7 Geology and Soils Site Context, Description and Mapping. The Geotechnical Report (Report) (DEIR Volume II, Appendix F) fails to identify, discuss, find context, origin or geotechnical implications of the Lusardi (sedimentary) Formation on the proposed construction site of the ACP. This is a major lapse and conflict. Failing to research and identify a primary mapped geological unit on a subject study site fails standard of practice for geotechnical engineering in California. While the DEIR Volume I text repeatedly describes the project area as "Lusardi boulder and cobble conglomerate" (e.g. p. 38, 232, 234, 251, 488) the Report does not describe site or published evidence of the presence of the Lusardi Formation at the site except as shown on Figure 3 of the Report (the most recently published regional geological map of Todd, 2004) and	This comment is acknowledged. During performance of the field exploration activities for the project Geotechnical Evaluation (Appendix F of the Draft EIR), the geotechnical consultant had a state-registered professional geologist with over 35 years of geology experience in San Diego County log and sample the exploratory test pits that were performed. Additionally, a state-registered professional geologist and certified geologist oversaw the project and its associated field activities. Based on their observations of the exposed materials in the exploratory test pits, they interpreted the surficial materials to consist of topsoil. Based on this experience, the project geotechnical consultant is confident in their geologic interpretations. The engineering characteristics of the interpreted topsoil including its highly expansive nature, low infiltration rates, and

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	to say in section 7.2.2. that the Lusardi Formation was not encountered at the site. Bulk material descriptions from the Report's description of 15 soil pit excavations is restricted to identification of "topsoil" and "decomposed granitic rock". No description of carbonate "K" horizons is given despite spoils of least one pit being characterized by nearly 50% carbonate content (TP5). With the exception of test pit 2 (TP2) all soils encountered in are described as monotonous clay, sandy clay or clayey sand. TP6, TP7, TP8 and TP10 contained a 4-foot depth of monotonous clay material. This continuity of volume of moderately to highly expansive "Bosanko stony clay" material does not indicate site soil is a weathering product of the local crystalline bedrock (Alpine Tonalite) but given mapping (Todd, 1980, 2004) is more probably the weathering product of arkosic Lusardi formation. This omission is all the more significant with the report's finding of extremely low infiltration rates and high soil expansion potential across the majority of the site, and County mapping of potentially expansive Bosanko stony clay soil on the project site (e.g. https://www.sandiegocounty.gov/dplu/docs/Geologic_Hazards_Guidelines.pdf (see page 14 and Figure 6) Omission of investigation of major unit identification, origin, geometry and character and sidestepping of the very substantial geological unit discrepancy is a substantial failure of the project's geotechnical report and undermines the geology, soils, soils engineering and grading sections of the Alpine Community Park DEIR.	presence of boulders have been addressed in the project Geotechnical Evaluation. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.
I64-13	Standard of Practice. The geotechnical report fails to achieve standard of practice for site evaluation (see scope of services Appendix F – page 768). At the EIR level, the report should include a review of topographic maps, geologic and soil engineering maps and reports (if available), stereoscopic aerial photograph review, and other published and non-published references; e.g. aerial photographs can be useful in identifying potential gravitational spread and flow features, atypical vegetation etc. Several sets of stereoscopic aerial photographs that pre-date project site area development taken at different	Please see MR-14 (Geology and Soils). As noted in Section 2 of the Geotechnical Evaluation (Appendix F of the Draft EIR), the consultant indicates in the first bullet that a background review was performed for the project. Documents reviewed included published in-house geotechnical literature, topographic maps, geologic maps, fault maps, historic stereoscopic aerial photographs, and project conceptual drawings. These documents are listed in Section 12, References, of the report. Based on this, along with the other aspects of the report, it is the consultant's

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	times of the year are particularly useful in identifying anomalous vegetation and geomorphic features.	professional opinion that the report was prepared in accordance with industry standards. No changes to the Draft EIR are needed.
I64-14	Expansive soils DEIR Volume II Appendix F, Conclusion 9 (page 775): "…expansive soils are not suitable for reuse as compacted fill beneath buildings, for retaining walls, or exterior concrete pedestrian flatwork." DEIR Volume II Appendix F, Section 9.13 Storm Water BMPs (page 791): "Based on the geologic contact between the topsoil and the underlying granitic rock, attempts to infiltrate stormwater are anticipated to result in lateral movement, ponding, and/or mounding of stormwater and perched water conditions. Additionally, due to the presence of medium to highly expansive soils onsite, such conditions are anticipated to adversely affect surrounding improvements. The DEIR analysis and engineering direction for construction of a large active-recreation facility on a site with demonstrated deep and highly expansive soil formation derived from the Alpine Lusardi Formation and decomposed Alpine Tonalite Formation across most or all of the project area appears to be incomplete and inadequate. A comparable project to elucidate these difficulties is the 1999 Joan MacQueen Middle School (JMMS) excavation in which multiple change orders were required due to finding of deep boulder and clay substrate across the full area of a comparable site. • Was the JMMS excavation and change order history requested from AUSD? • Will there be a independent evaluation of specific impacts to construction and operational costs imposed by challenging site geotechnical conditions? • The DEIR and Geotechnical Report refer to County Guidelines for construction in sites with highly expansive soils per UBC and state the impacts would be less than significant, the DEIR does not adequately address these Expansive Soils as a County Geologic Hazard – (Project site is specifically located in mapped areas subject to County Guidelines for construction on sites with Geologic hazards):	This comment is noted. The project geotechnical consultant did not reach out to the Alpine Union School District regarding change orders for a project at the Joan MacQueen Middle School. However, the project geotechnical consultant is familiar with the subsurface conditions at the school. The project Geotechnical Evaluation addresses the presence of expansive soils at the site and provides remedial grading recommendations to mitigate these conditions. Section 87.403 "Cuts -- Expansive Soils" of the County of San Diego Grading Ordinance indicates that the recommendations to address the expansive soil mitigation efforts may be amended by a soil engineer. Please see MR-14 (Geology and Soils) for additional details. No changes to the Draft EIR are needed.

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I64-15	https://www.sandiegocounty.gov/dplu/docs/Geologic_Hazards_Guidelines.pdf DEIR states on Vol 1 page 241 in relation to the requirements for Expansive Soils that "The project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and does not conform with the Uniform Building Code.	The expansion indices and potential expansion of onsite soils were addressed and mitigation recommendations were provided in various sections the project Geotechnical Evaluation in accordance with Section 18 of the current 2019 California Building Code. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.
I64-16	• Is it an oversight that grading instructions in DEIR Volume II Appendix F are not as required per the SDC grading ordinance linked below? https://www.sandiegocounty.gov/content/dam/sdc/dpw/PERMITS_FORMS_CHARTS_DRAWINGS_MANUALS_TEMPLATES_GUIDES/propgradord.pdf	The geotechnical consultant is familiar with the County of San Diego Grading Ordinance when it comes to developing of earthwork recommendations. For instance, Section 87.403 "Cuts -- Expansive Soils" describes the removal of 2 to 3 feet of exposed materials and replacement with non-expansive soils. However, the section notes that these recommendations may be amended by a soil engineer. Remedial grading recommendations are provided in the project Geotechnical Evaluation signed by a registered soil engineer. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.
I64-17	• Does the Project expect to receive inspector approved UBC and SDC grading design exceptions for depth of compacted non-expansive fill beneath footing pavement and other flatwork? • Will specific depths of non-expansive fill be required beneath any ballfields or other play areas? • Since construction on expansive soil sites is possible under UBC guidelines has the County evaluated cost of excavation and replacement of the upper 2-4 feet of soil beneath all buildings and pavements? • It is not clear from DEIR discussions and evidence whether there are sufficient nonexpansive soils present on site that can be excavated and reused to accomplish the project design. Has the County for a presumed large volume of hard crystalline boulders and ripped granitic bedrock in the grading plan? • If excess large rock materials are present will they be crushed on site to provide nonexpansive substrates?	Sections 9.1.5 through 9.1.7 of the project Geotechnical Evaluation provides recommendations for the remedial grading beneath proposed buildings and flatwork. These recommendations will be incorporated into the grading design and grading plan development. The Geotechnical Evaluation focuses on grading recommendations for structural improvements, surface improvements, and slopes. Rock crushing is not anticipated to be part of this project, but if it does occur it would be offsite. Existing site soils have been analyzed. The project geotechnical engineer has provided recommendations for mitigation of existing soil types for proposed site amenities including flatwork, which are incorporated into the design plans and specifications. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.

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I64-18	Since substantial rock crushing will very likely be required to produce non-expansive fill material and to reduce transportation greenhouse gas (GHG) impacts should sound and vibration from this activity be included in DEIR section 4.13? • If the large amount of required non-expansive substrate cannot be generated on site it would need imported. Has the potential GHG impact of this transportation been accounted for in DEIR section 4.8? • Have potential GHG transportation impacts of removing surplus expansive soils and importing suitable foundation base been accounted for in DEIR section 4.8?	Rock crushing is not anticipated to be part of this project. The GHG analysis calculated the GHG emissions from approximately 45,900 cubic yards of soil export and 54,144 cubic yards of soil import. The modeling assumes two trips at 16 cubic yards for this soil hauling. In total, the Grading/Excavation and Construction phases would have 1,692 haul truck trips traveling a distance of 20 miles each (Appendix C of the Draft EIR). These hauling trip emissions are a part of the project's total GHG emissions. Therefore, the Draft EIR analyzed the potential GHG emissions from soil import/exports. No changes to the Draft EIR are needed.
I64-19	Note that the mitigation guidance for site construction does not refer to, or meet requirements of the County Grading Ordinance or Geological Hazard Guidelines linked above. County grading ordinance requires that three feet of compacted non-expansive fill be placed beneath all structural features unless specifically allowed by an inspector-approved engineering study, and that at least two feet of compacted non-expansive fill be placed beneath all pedestrian flatwork including skate parks, sidewalks, curbs, drains etc. The import of two to three feet of screened non-expansive fill for all flatwork and structures does not appear to be accounted for in the DEIR.	Please refer to the response to comment I64-16. Section 87.403 "Cuts -- Expansive Soils" of the County of San Diego Grading Ordinance indicates that the recommendations to address the expansive soil mitigation efforts may be amended by a soil engineer. Remedial grading recommendations are provided in the project Geotechnical Evaluation signed by a registered soil engineer. No changes to the Draft EIR are needed.
I64-20	Storm water. DEIR volume II, Appendix F, section 9.13 Storm Water Best Management Practices "As previously discussed, the site subsurface soils at the project site had factored infiltration rates ranging from a no infiltration condition to very slow variable infiltration rates. Based on the geologic contact between the topsoil and the underlying granitic rock, attempts to infiltrate stormwater are anticipated to result in lateral movement, ponding, and/or mounding of stormwater and perched water conditions. Additionally, due to the presence of medium to highly expansive soils onsite, such conditions are anticipated to adversely affect surrounding improvements. Accordingly, we recommend that the project consider the use of pavement edge drains and cutoff curb along the sides of infiltration devices to reduce the potential for lateral migration	This comment quotes text from Appendix F and does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.

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	of water. Additionally, we recommend that permanent infiltration devices incorporate an overflow pipe that is connected to an appropriate outlet."	
I64-21	With juxtaposition of paved and carpeted areas, field design requirement of local drainage of grass playfields, and shallow "infiltration" caps on remaining clay and bedrock substrates the ACP infiltration area appears to be restricted for a large, active use park. Below are a series of questions that may help clarify the intensive planning required for a site characterized by moderately to extremely impervious soils and shallow crystalline bedrock substrates. Further, all soils (and probably most sub-soils to an unknown depth) are described in Appendix F as very expansive and if wetted are likely to " adversely affect surrounding improvements.	The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I64-22	How did the DEIR evaluate and engineer mitigate for the impervious soils that characterize the entire proposed construction area? Will the ACP be required to obtain a permanent stormwater release permit? Is there any other means for mitigation of storm-water and substantial irrigation runoff at a site that has "no infiltration condition to very slow variable infiltration rates?" If expansive fills and substrates are allowed to become saturated (e.g. by irrigation, stormwater infiltration and by construction disturbance creation of hydrological "fast paths" from the surface into existing clays) the site may become unstable (see excerpted text below). Language of the geotechnical report indicates that curbs channels and catchment ponds should be lined to prevent infiltration, and that retention ponds need to have overflow provisions for excess runoff.	The project Geotechnical Evaluation has infiltration test results and provides recommendations for the design of stormwater BMP facilities. The project would comply with state and County stormwater requirements. Please see MR-14 (Geology and Soils) for additional information. No changes to the Draft EIR are needed.
I64-23	Since storage, evaporation and runoff are the only water management utilities at this site, will not excess storm-water and irrigation exit the site carrying water-borne road-oil, fertilizer, pesticide and herbicide will leave the site via overflow pipes to street drains, streams and reservoirs?	Please see the response to comment I39-31. No changes to the Draft EIR are needed.

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I64-24	This last point is a clear indication that essentially all storm-water will leave the site since all "infiltration ponds" need to protect against infiltration, and all ponds, curbs and edge drains need to be lined, and infiltration ponds are required to have outlets for storm-water runoff. It appears that all storm-water and most irrigation water will run off the site from 6 acres of irrigated turf, 8-10 acres of irrigated landscaping/gardens and the balance of 9-11 acres of hard and impermeable surfaces (totaling 25 acres). Can the County show that storm-water will be fully accommodated by storm-water retention pond(s)? In the dozens of storm-water references in the DEIR it is not disclosed that soils of the site do not accommodate infiltration such that engineering design requires overflow from lined retention pond(s) which themselves will only empty by draining or evaporation and all site contaminants will run off or collect in retention ponds. Evaporation in San Diego is averages 60 inches per year(https://semspub.epa.gov/work/01/554363.pdf). Storage of runoff in retention ponds will thus concentrate any contaminants. Actual extreme storm runoff, for example 2" rain accumulation in 48 hours (two acre-feet = 652,000 gallons = 87,000 cubic feet) would require an equivalent retention pond of an Olympicsize swimming pool (and would still need to be drained of storm water). Precipitation events twice this size are not rare in San Diego (see weather.gov extreme weather inventory page 3 to 53, linked below), i.e. retention of a 4" rain event requires a retention volume of 1,300,000 gallons, 174,000 cubic feet etc. https://www.weather.gov/media/sgx/documents/weatherhistory.pdf https://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED_PROTECTION_PR OGRAM/watershedpdf/WPO.pdf	Please see the response to comment I12-4. Stormwater retention ponds would be designed to accommodate stormwater. No changes to the Draft EIR are needed.
I64-25	These questions arise from DEIR storm-water discussions (e.g. Section 4.10 page 319) • Has management of retention ponds been evaluated in operational cost estimates for the ACP?	As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, the project would adhere to the County's Jurisdictional Runoff Management Plan, *BMP Design Manual*, *LID Handbook*, and Watershed Protection, Stormwater Management, and Discharge Control Ordinance, ensuring it would not violate any water quality standards or discharge requirements. A Stormwater Quality Management Plan would be prepared for the

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	• What are the specific MEP BMP storm-water parameters for ACP, i.e., what erosion and contaminant increases will be permitted downstream of ACP? • Over what period will down stream erosion and water quality be monitored? • Will the ACP SWQMP be able to meet SDC WPO LID requirements for site design and management, that is, area, depth and infiltration parameters of placed pervious materials? • Will the ACP SWQMP meet SDC WPO LID requirements for active runoff controls and accumulated toxics management? • Since grassland has co-evolved with impervious site soils to slow runoff from the site, how does the ACP SWQMP compare to replaced natural conditions for managing the rate and quality of storm runoff into the nearby El Capitan Reservoir of the City of San Diego water supplysystem? • Will pre-construction runoff and water quality measurements be obtained at intervals downstream of the ACP? • What agreements, easements, and licenses have been completed for proposed BMP construction, location, maintenance, or changes to drainage character?	project in compliance with the County ordinance and would include effective LID features and permanent BMPs to mitigate stormwater impacts. No changes to the Draft EIR are needed.
I64-26	Crushing of granitic boulders and excavated bedrock. Appendix F section 9.1.3 Excavation Characteristics: "During our subsurface evaluation, we observed outcroppings of rocks at the surface and encountered decomposed granitic rock with corestones in varying states of weathering. Onsite excavations will encounter very difficult excavation conditions due to the presence of bedrock materials, boulders, and/or corestones. The contractor should be prepared for the use of heavy ripping, rock breaking, rock coring, and/or blasting techniques to perform onsite excavations. Additionally, onsite excavations will generate oversize materials that should be screened, rock picked, crushed, removed, or otherwise processed from the excavated materials prior to reuse as compacted fill."	This comment quotes text from Appendix F and does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.

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I64-27	The following bullets illustrate one aspect of the Alpine Lusardi Formation and focus attention on reasons that characteristic of constrctuon site geological formations can be critically important inputs for evaluations of construction effort and associated costs and to operational challenges and cost • (Personal recollection of site conditions during construction of Joan MacQueen Middle School): "I distinctly remember visiting/monitoring the Joan MacQueen Middle School (JMMS): site every week in 1999 during excavation and grading. The soils were made up of boulders, often massive in size, embedded in a variety of clay substrates (white, grey, red) which turned to goo when it rained. What a construction mess it was! Then in 2000-2002, (the) first few rounds of landscaping with native plants failed miserably because of the drainage. The "Jeffersonian Lawn" became a mud hole which was unusable and needed to be roped off all winter. Even one of (the) large boxed specimen Engelmann Oaks couldn't survive" The presence of large stream-trasported boulders (up to and in excess of 10 feet in diameter) is a uniform characteristic of all occurrences of the Lusardi Formation in Alpine and elsewhere. Grading of boulders and liquefied clay after rains is noted from construction observation at JMMS (personal communication above) as generating substantial change-orders during rough grading of the JMMS site. It is not known if mitigation was performed for expansive soils at the JMMS site, however it I note that impermeability and rapid erosion characterize all the exposed and shallowly covered native soils at JMMS.	This comment presents a personal recollection of the site conditions during the construction of Joan MacQueen Middle School. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I64-28	Screening and crushing of all rock material larger than 3 inches in size will be a major cost to this project. Processing of this material on site will require a large rock crusher and very likely will also require substantial blasting to reduce the size of materials to a size that can accommodate processing to provide the substantial engineered fill needed to replace site rock materials and expansive soils. Bullets set out below are intended	The project Geotechnical Evaluation provides grading recommendations that would be considered when developing the estimated cost. The project Geotechnical Evaluation recommends that engineered fill possess materials of 6-inch dimensions or less. Accordingly, the Geotechnical Evaluation does not recommend the placement of rocks or boulders larger than 6 inches into the engineered fill materials. Please see MR-14 (Geology and Soils)

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	to elucidate major costs and corollary impacts for reduction of oversize materials. • Since 20% or more of site substrate is believed to consist of hard, intact granitic bedrock and crystalline boulders and cobbles larger than 3 inches in diameter, have costs and collateral impacts to construction noise, vibration and GHG been evaluated for both crushing and removing this material? • Is there understanding in the engineering and cost estimating for of the site grading plan that site boulders will range up to 10 feet in diameter as experienced during the 1999 excavations for Joan MacQueen Middle School? (see below). • Is large crystalline rock material planned to be buried in perimeter landscape berms? • Is burial of oversize material a significant design purpose of the perimeter landscape berms? • Have the County or County's consultants requested excavation design, budget and change-order records for nearby Joan MacQueen Middle School to more objectively evaluate potentially very large construction cost over-runs and costly or potential inability to achieve compliance with SDC storm-water ordinances?	for additional information. No changes to the Draft EIR are needed.
I64-29	DEIR Section 4.8 Greenhouse Gas Emissions and Climate Change Does the DEIR have a greater legal basis or opinion to skip analysis of ACP user contributions of greenhouse gas from additional car and bus trips to the ACP from the region (20 mile radius as applied for in the Prop 68 regional park application)? Is it a County-wide determination that the court ruling striking down part of the 2018 CAP EIR, exempts the DEIR from analysis of an ACP operational impact significance determination? The DEIR asserts that "the court did not find fault with the CAP's 26 GHG reduction measures. Therefore, while the 2018 CAP may not be used for project impact significance determination, the relevant GHG reduction measures of the 2018 CAP may be used to mitigate project-specific GHG impacts (County of San Diego	Please refer to MR-8 (Greenhouse Gases and Energy). Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR quantifies the project's operational GHG emissions from mobile sources. The project would have 480 daily trips with the mobile emissions from those trips shown in Table 4.8-4 and in Appendix C of the Draft EIR. The project's compliance with regulatory programs adopted by CARB and other state agencies is used to evaluate the significance of the project's GHG emissions, specifically the CARB 2017 Scoping Plan. As shown in Threshold 1 and Threshold 2 of Section 4.8 of the Draft EIR, the project's operational GHG emissions would be consistent with the CARB 2017 Scoping Plan; therefore, no GHG reduction measures were required. The 2017

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	2021a)". It feels like this separation of construction from operational GHG contribution is arbitrary.	Scoping Plan emphasizes the importance of reducing VMT to achieve mobile-source GHG emission reductions necessary to reach statewide climate goals. As detailed in Section 4.17, *Transportation and Circulation,* of the Draft EIR, the project's VMT impact was deemed less than significant. Based on this, the project's mobile-source GHG emissions would not conflict with SB 743. Because reducing GHG emissions from passenger vehicles is one of the objectives of SB 743 and one of the overarching strategies of the 2017 Scoping Plan, operation of the project would not conflict with the statewide GHG target for 2030 mandated by SB 32. Furthermore, the project's total construction GHG emissions were amortized and added to the project's annual emissions (see Table 4.8-4). No changes to the Draft EIR are needed.
I64-30	DEIR (sections 4.8, 5.3.3) deal with greenhouse gas issues and the County concludes that the only impact of significance to the DEIR is construction, and while very significant, (excavation of 48,000 cubic yards of soil = 3000-5000 dump truck loads), doesn't the County avoid the spirit and intention of the CAP, with its exemption park visitor travel in asserting that "the 2018 CAP may not be used for project impact significance determination?" so the DEIR addresses only construction related greenhouse gas emissions and asserts that operation related emissions will be negligible, completely ignoring the fuel required to bring up to "thousands of visitors per day" (Rhodes Associates 2020).	Please refer to the response to comment I64-18 for a detailed breakdown of the soil import/export and construction GHG emissions. Section 4.8, *Greenhouse Gas Emissions and Climate Change*, of the Draft EIR does analyze the project's operational emissions. As discussed on page 4.8-13, the project would result in 480 daily trips. These 480 daily trips were modeled in CalEEMod with GHG emissions quantified and shown in Table 4.8-4. No changes to the Draft EIR are needed.
I64-31	Does analysis of visitor greenhouse gas contribution look something like this: auto emission per mile is 0.8 lbs of carbon dioxide. 500 daily round trips from El Cajon/Lakeside (25 miles RT, much closer than the 40 mile RT radius in the Prop 68 ACP regional park grant application) would generate 1800 tons (3.6 million lbs) of additional greenhouse gas per year. This would seem a minimum estimate of annual GHG contribution over the life of the park?	Please refer to Appendix C for the modeling breakdown of the operational GHG emissions from the 480 daily trips. No changes to the Draft EIR are needed.
I64-32	On page 42 the DEIR introduces that public gatherings (sports, holiday, private gatherings will be allowed by to operate by	See MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the Draft EIR are needed.

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	permit with lighting and a public address (PA) systems between the hours of 7 am and 10 pm. How does this relate to DPR statements conveyed and recorded in outreach meetings indicating that the park has no plans to install event lighting or allow sound systems. Has the County studied impacts to avian and bat foraging by event noise and lighting? Impacts to wildlife and neighborhood comity are likely to be very great for events ending up to 5 hours past sunset and opening as early as sunrise.	
I64-33	Page 362: "The existing noise environment in the project vicinity is generally quiet. The primary sources of noise are traffic on South Grade Road. Other noise sources in the project are birds and landscaping activity." Page 367: It is noted that the zoning of the project site and the surrounding uses is a mix of S80 (open space), R-R (rural residential), and A-70 (limited agricultural use), which all fall under Zone 1. Therefore, the applicable base sound level limits (before any corrections for ambient noise levels) are 50 dBA Leq between 7 a.m. and 10 p.m. and 45 dBA Leq between 10 p.m. and 7 p.m.	To further expand on the San Diego County Code of Regulatory Ordinances referenced by the commenter, Table 4.13-3, San Diego County Code Section 36.404 Noise Limits, addresses the zoning and noise levels. This section further states, "If the measured ambient level exceeds the applicable limit noted above, the allowable one hour average sound level shall be the ambient noise level, plus three decibels." Table 4.13-2, Measured Existing Noise Levels in the Study Area, shows that ambient noise levels within the area exceed the 50-dBA 1 hour L_{eq} referenced in the San Diego County Code of Regulatory Ordinances.
I64-34	Note that in the DEIR's own studies (Table 4.13-6 – page 371) soccer field noise averaged 59 dBA at 115 feet and skate park noise averaged up to 66.5 dBA at 60 feet. Does DPR envision an enforcement mechanism for San Diego County Code Section 36.404 Noise Limits?	Table 4.13-6 and Table 4.13-7 are measured reference noise levels for specific noise features that would be included as part of the active park. Table 4.13-12 shows that project-related noise levels would not exceed the limits listed in San Diego County Code of Regulatory Ordinances Section 36.404. No changes to the Draft EIR are needed.
I64-35	The DEIR project impact conclusion reads as follows: "Threshold 1: Implementation of the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies." • Can the proposed ACP operate under the moderate sound level limits permitted by present zoning?	As discussed in Section 4.13, *Noise and Vibration*, of the Draft EIR, predicted noise levels associated with construction for the park would comply with the County's 8-hour L_{eq} standard of 75 dBA. However, construction associated with the extension of the sewer system would exceed the County's 8-hour threshold for construction noise. As such, **MM-NOI-1** would be required to reduce impacts to less-than-significant levels. Noise levels for operational components of the project were analyzed and the predicted noise levels for the park activities all comply with

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	• Is there a legal precedent in San Diego County for change of permitted land use in excess of prior sound level limits?	adjusted sound level limits. No significant impacts were identified and a number of best practices and operational controls would be in place during the operation of the Alpine Park (**MM-NOI-2** and **MM-NOI-3**) to ensure onsite operational noise impacts are less than significant. No changes to the Draft EIR are needed.
I64-36	DEIR Section 4.19 Utilities and Service Systems Water Estimated annual water use, Alpine County Park: • Recommended average-annual water use for turf grass in a dry climate is 1 inch per week. • One inch of water over an acre is 27,150 gallons, thus 6 acres of recommended water use is about 163,000 gallons a week. 52 x 163k —> 8.5 million gallons/year (1.35 million cubic feet) at ten cents a cubic foot the annual water bill for six acres of grass would be about $135,000. • One inch of irrigation per month over 8 acres of landscape features (berm, and green space) amounts to 55,000 gallons per week along with sanitary facilities and a residence could require up to another 20,000 gallons per week respectively for a grand total of 238,000 gallons per week and 12,400,000 gallons per year, or two million cubic feet and an annual water cost of about $200,000. Per DEIR Table 4.19-5. (page 445) Projected Water Demand for the Project shows anticipated annual use is actual 16,471,273 gallons, supporting the preceding analysis and estimate.	The commenter presents their own analysis of estimated annual water use and restates information presented in Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.
I64-37	4.19.4.3 Project Impacts and Mitigation Measures: Threshold 2 (page 447, 450) Impact Determination (page 451) Impact-UTIL-2: Insufficient Water Supplies Available to Serve the Project During Operation. Due to the potential increase in water demand as a result of implementation of the project, PDMWD (Padre Dam) cannot guarantee that at some point in the future, supply of imported water would not be diminished. Therefore, given this uncertainty regarding available water supply, which is	County DPR received a water availability letter from PDMWD that confirmed water demands associated with the project would be met. However, a water supply assessment would still be required to conclude PDMWD would be able to provide adequate water supplies for operation of the proposed park during the life of the park. This requirement was included as **MM-UTIL-2: Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits** in Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please refer to MR-

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	necessary for operation of the project, potential impacts are considered to be significant. • Are ACP investments in expansive turf and landscape planting (on a site with no ground water retention capacity) justified if San Diego County water supplies could be diminished due to (for example) calls that the Colorado River water supply be redirected for agriculture or to meet cross border water supply treaties?	15 (Water and Wastewater) for more information. No changes to the Draft EIR are needed.
I64-38	Septic Options for Septic Management: • A traditional septic drain field (not viable due to percolation constraints); • Connection to County Sewer District (outside of urban limit line), up to $5M to connect at ca. $500/ft plus pumping station, possible legal issues because Supervisors are in charge of code and County previously disallowed connection to Stagecoach Ranch (1993) and Singer Apollo Group (2009-2020); • On site treatment, questionable “infiltration” of liquids and trucking of solids	The comment summarizes options for septic management. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No changes to the Draft EIR are needed.

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I64-39	Wastewater generation: Table 4.19-4. (page 445) Projected Wastewater Demand for the Project DAILY 8630 gallons ANNUAL 3,150,000 ADDITIONAL REFERENCE MATERIAL Alpine-Lakeside Sewer Master Plan: https://www.sandiegocounty.gov/content/dam/sdc/dpw/SAN_DIEGO_COUNTY_SANITAT ION_DISTRICT/Sewer%20Master%20Plan/Alpine%20Lakeside%20Sewer%20Master%20Plan %2001%2012%2012.pdf 1.3 "The County Board of Supervisors serve as the Board of Directors (Governing Board) for the San Diego County Sanitation District, of which the Alpine SSA is a part." 2.1 "The Alpine SSA boundary is also described as the Town Center boundary in the Alpine Community Plan, amended April 17, 2002. Topographically, the study area varies considerably ... The Alpine SSA and Sphere of Influence boundary, affirmed September 2, 2010, as part of the LAFCO Municipal Service Review Update, includes both developed and undeveloped areas and encompasses approximately 950 and 2,100 acres, respectively." (ACP IS ENTIRELY OUTSIDE of EITHER THE ALPINE SSA OR THE ALPINE SOI AND SO IS NOT INCLUDED IN ANY PRIORITY FOR SEWER HOOKUP) The only parcel with sewer service outside the current bounds of the Alpine Sanitation District is Joan MacQueen Middle School. Note that park is outside both the Alpine sanitation district and sphere of influence boundaries.	The existing conditions for wastewater service at the project site are discussed in Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
I64-40	Notes: Cost: ACP is at least 4000 feet from the closest potential Alpine SSA septic hookup the north along South Grade Rd intersection with Manzanita View Rd. Septic main extension from outside of Alpine SSA or "sphere of influence", if allowed is a 4000' (Manzanita), 6000' (Alpine Bl) to 10,000' (Tavern) sewer line likely requiring pump stations for any significant rises of along the route. Estimated cost for this Alpine SSA extension, if it were allowed, is between $2M and $5M (@500/ft). For comparison onsite septic treatment is believed to also cost about $2M for construction.	County DPR is considering either an onsite septic system or a sewer line extension for the project and both options were analyzed in the Draft EIR. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
I64-41	DEIR SECTION 4.19.4.3 Project Impacts and Mitigation Measures Indicates two septic management schemes, either hookup to	This comment states the two septic management options for the project and estimates potential costs. The comment does not

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	existing sewer at Tavern Road (crossing the WF preserve? Appears to be more than 10,000 feet so on the order of $5M @ $500/ft); or in South Grade Road or near Alpine Boulevard (appears to be more than 6000 feet so potentially more than $3M	raise any specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
I64-42	ON SITE SEPTIC On-site septic drainage is greatly limited due to critical geotechnical limitations of both Lusardi formation clay-boulder substrate and granite bedrock underlying 100% of the proposed park site. In other words there is probably insufficient septic percolation anywhere on the proposed 25 acre park site.	County DPR is considering either an onsite septic system or a sewer line extension for the project and both options were analyzed in the Draft EIR. No changes to the Draft EIR are needed.
I64-43	A septic liquids "drain field" is technically possible north of the park site within a 2.5-acre depression coincident with the headwater basin of the North Branch of Alpine Creek This depression may coincide with the infiltration area of a local aquifer which is pumped for domestic water by the surrounding residences. Required septic flow https://www.epa.gov/sites/production/files/2015-06/documents/2004_07_07_septics_septic_2002_osdm_all.pdf https://www.epa.gov/sites/production/files/2015-06/documents/septic_1980_osdm_all.pdf	The comment does not raise any specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.
I64-44	The size of septic drainfields for non-residential installations like hotels, restaurants and parks vary widely in the wastewater volume used per person per day depending on the type of facility, the number of visitors to it, how long they stay there, and what activities they pursue. Wastewater volume designs need to account for different kinds of usage and visitor numbers. For a picnic park the range of wastewater usage/person/day is 5-10 gallons. Rhodes Associates bases their fire study on the anticipation of "several thousand per day in developed recreation sites. Septic is always designed for greatest anticipated use. Taking the high average of 10 gallons/person/day septic capacity (for up to 3000 persons/day) would be 30,000 gallons/day. Range of drainage field area for this flow is 30,000 square feet (0.7 acres, possibly smaller depending on soil percolation rate).	The comment does not raise any specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is necessary. No changes to the Draft EIR are needed.

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I64-45	REFERENCE TO DEIR 4.19.4.3 Project Impacts and Mitigation Measures The DEIR appears to underestimate Septic flow requirements to 5000 gallons/day if there is to be on site septic treatment (see calculation above and Table 4.19-4. (page 445) which estimates 8630 gallons of septic effluent per day) estimating a flow rate of just 5000 gallons/day is below the minimum advisable capacity and the County's own estimate (see above). This could be a real problem for on site treatment if park usage exceeds what is asserted by the DEIR. • Does the DEIR "on site treatment" septic flow of 5000 gallons per day require that site visitor numbers would be limited to 500/day? • Is it possible to permit septic infiltration into a shared aquifer?	Please refer to MR-15 (Water and Wastewater) for additional information. Table 4.19-4 provides the projected wastewater demand for the project using generation rates identified in the *Alpine and Lakeside Sewer Service Areas Sewer Master Plan* (Atkins 2011). Generation rates used are based on institutional land use as a conservative approach to develop an estimated amount of wastewater that would be produced as a result of implementing the project. Both an onsite septic system and sewer line extension were analyzed for the project and it is not known at this time which option would be implemented. No changes to the Draft EIR are needed.
I64-46	DEIR Section 4.20 Wildfire "The Community of Alpine is situated to arguably pose one of the worst Wildland-Urban Interface conditions in the County of San Diego and is in a known location of repetitious major wildfire occurrence. Such locations of repeat occurrence are known as "historical wildfire corridors" Per Rhode and Associates Proposed Alpine County Regional Park Fire and Emergency Operational Assessment 8/17/20 (RA20) References to the DPR fire consultants report are miss-spelled 21 times (as "Rohde" instead of "Rhode" and the Rhode Associates 2020 report (RA20) is not appended as an Appendix. Findings of RA20 are devastating for this park site and omission of that report is a red flag for this DEIR and does not allow full and complete review of all site hazards and conditions.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. The open space follows DPR Policy C-33 during red flag warnings and Policy C-40 during a fire event. During each of these times there is an increase in patrols around the open space and more frequent interactions with visitors by the staff. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. Changes to the Draft EIR were made to correct any misspelled references or words. Additionally, the FEOA is included in Appendix J of the RS-Draft EIR.
I64-47	Relevant points in DEIR: County of San Diego General Plan (page 467) Policy S-3.1. Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.	This comment is acknowledged. Please see the response to comment I64-46 and MR-9 (Wildfire) for additional information pertaining to wildfire. The proposed park would implement specific fuel modification criteria and adhere to all California Building Codes and California Fire Codes and guidelines.
I64-48	Policy S-3.2. Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account	Please see the response to comment I64-46. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR and the FEOA included as

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	for topography and reduce the increased risk from fires. (Site is at Top Of Slope relative to Santa Ana winds directed from the east – the most likely wildfire scenario) • How does Park planning respond to increased fire risks created by the design site at a "top of slope" relative to the prevailing Santa Ana wind direction?	Appendix J of the RS-Draft EIR for information concerning planning procedures to limit wildfire risks.
I64-49	Policy S-3.5. Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently. This policy cannot be met and is a critical hazard per RA20. • How does Park planning respond to increased fire risks created by the lack of ability to provide safe access for fire equipment and concurrent civilian evacuation? Can staff elaborate on all RA20 fire scenarios and response plans as they relate to the proposed Park site, and to adjacent areas of southeast Alpine and as the Park relate to Alpine as a whole.	Please see the response to comment I64-46. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR and the FEOA included as Appendix J of the RS-Draft EIR for information concerning the Site Evacuation Plan and regulations that would reduce the potential for the project to exacerbate wildfire risks. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K.
I64-50	It is incredible that wildfire has not burned across the area of the County's Alpine property and Wright's Field Preserve since the 1970 Laguna Fire. During the 2018 West Fire, scene command was certain the fire would run west across the grassland and extend indefinitely into neighborhoods in that direction. This terrible outcome was inhibited, but not prevented, by firefighting. The primary reason the fire was brought under control was a drop in wind and temperature. It is certain that a large increase of potential ignition sources will be introduced by smoking materials of youth (and other park users) crossing and assembling in grassland while coming and going from the proposed park attraction. Near certainty of eventual occurrence of a fire ignited auxiliary to the transit of "thousands of daily park users and hundreds of daily users of adjoining land" (RA20).	Please see the response to comment I64-46. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR and the FEOA included as Appendix J of the RS-Draft EIR for information concerning the Site Evacuation Plan and regulations that would reduce the potential for the project to exacerbate wildfire risks. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K.
I64-51	A real question arises whether a park at this site should remain open during even modest wind events. I feel strongly that park-caused increases of fire hazard to adjoining habitat areas and	Information from the FEOA in Section 4.9, *Hazards and Hazardous Materials*, and Section 4.20, *Wildfire*, of the RS-Draft EIR acknowledges that the project site historically has been

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	extended neighborhoods needs to be more deeply and critically evaluated in the EIR process.	subject to wildfire regulations and County DPR will implement measures to further reduce the potential for the project to exacerbate wildfire risks. Please refer to MR-9 (Wildfire) for additional information.
I64-52	EXCERPTS FROM FIRE EVACUATION PLAN (RA20, Appendix A) Alpine South-East Wildland-Urban Interface Fire Emergency Response and Evacuation Plan "Potential Choke Points/Entrapments: Be prepared to shelter community population in Alpine as all evacuation routes may be cut off by fire spread. Farthest east Alpine area of "Old Ranch" is more rural, and has numerous areas with entrapment potential." "Access: …All evacuation routes may be compromised during major fire" …Be vigilant for possible closure by fire of I-8, and therefore plan to shelter-in-place all civilians within the community of Alpine. Continue to use air support to protect shelter-in-place operations within the community." "Evacuation Trigger Point: Evacuate entire plan area for a major Santa Ana/east wind-driven fire spreading west of Hwy 79 or south of I-8, or southwest of Boulder Creek Rd and Eagle Peak. End evacuation and switch to shelter-in-place when fire spreads west of West Willows offramp, or south of Anderson Rd/Boundary Truck Trail. For a west wind driven fire, start evacuation when fire crosses into the drainage east of the South Grade Rd and Arnold Way intersection. Evacuate for any fire starting within the plan area and escaping initial attack with high winds and rapid rates of spread. Evacuate in stages to avoid severe traffic congestion."	This comment includes excerpts from the Fire Evacuation Plan included as Appendix A of the 2020 FEOA. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR. No further response is required. No changes to the Draft EIR are needed.
I64-53	With the RA20 scenarios and considerations quoted above, is the County willing to assume expressed liability for increased congestion in this, arguably, most-hazardous fire evacuation location in San Diego County?	This comment is acknowledged. Please see the response to comment I64-46 and MR-9 (Wildfire) for discussion of a site-specific evacuation analysis that included nine traffic evacuation simulations.
I64-54	Fire Egress Traffic 300-500 homes in park area are already cited as likely "shelter in place" by RA20. Wind driven fire is certain to impact the proposed park site and surrounding neighborhoods in the foreseeable future. A significant fire bearing down from the east during a Santa Ana wind pattern will require evacuation	This comment is acknowledged. Please see the response to comment I64-46 and MR-9 (Wildfire) for discussion of a site-specific evacuation analysis that included nine traffic evacuation simulations.

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	of about 500 homes and up to 1000 vehicles onto South Grade Road. I attached a "Fuels Map" to the NOP, which I drafted for my interest in fire fuels distribution across Palo Verde Ranch, Ranch Palo Verde and neighborhoods immediately upwind in a Santa Ana firestorm approaching the proposed park site from the East (e.g. Laguna Fire 1970). Parking for up to or potentially more than 300 additional vehicles at Alpine County Park is now proposed. Since the park is directly downwind from a large mass of old growth chaparral, 200 wood homes and extensive mature (up to 50-year-old) landscape planting, fuels to the east will take many hours to burn out.	
I64-55	Can the park be cited as a planned evacuation shelter if air quality conditions could, by themselves, lead to mass casualties at the park site and lead to a secondary evacuation from the those attempting to shelter at the park? • Can the potential of this occurring be evaluated by independent wildfire experts?	Alpine FPD has reviewed the park's design relative to wildfire and evacuation. No changes to the Draft EIR are needed.
I64-56	Taking the worst case, which is the most conservative evaluation, of a fire occurring during the daytime on a weekend, within a high time-of-use for the park and area roads, up to 300 vehicles would exit onto South Grade Road, slowing normal traffic (which is up to a few vehicles per minute) and eventually backing up at controlled intersections. A line of 300 cars is almost exactly one mile in length (https://www.quora.com/How-many-cars-make-up-a-mile), thus without any cars entering South Grade Road from the adjacent communities, cars could be backed up to Tavern Road or to Alpine Boulevard. With the addition of cars entering from surrounding homes traffic could quickly back up in both directions to such a degree to produce hazard of a mass casualty event. Evaluation of various fire traffic scenarios including "worstcase" scenarios must be an integral part of EIR traffic studies for the proposed Alpine County Park, and to date the DEIR does not evaluate fire scenarios for the proposed park.	This comment is acknowledged. Please see the response to comment I64-46 and MR-9 (Wildfire) for discussion of a site-specific evacuation analysis that included nine traffic evacuation simulations.
I64-57	Thank you for taking my input. I appreciate your consideration of this extensive letter response to portions of the Alpine County	The County appreciates the comments submitted on the Draft EIR. These comments and the included contact information will

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	Park Draft Environmental Impact Report. I look forward to a constructive dialogue with DPR. I am available to discuss any of the above materials at your convenience. Please continue to email all notices relating to this project at geoplw3@gmail.com	be shared with the County of San Diego Board of Supervisors. No changes to the Draft EIR are needed.

Comment Letter I65: Jean and Carl Wirtz, November 11, 2021

Comment#	Comment Text	Response
I65-1	As a 21 year residents of Alpine it would be nice to see some recreational facilities, especially pickleball, in Alpine. The closest public courts are in Lakeside. Certainly the population of Alpine and the surrounding area would justify some courts for one of the fastest growing sports in the country. The field as is seems pretty hard to use for biking unless you are a hard core rider which limits the population. We do think that all of the ball fields, etc. should be scaled back since there are already several facilities at the schools.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for pickleball courts is noted for the record. No changes to the Draft EIR are needed.

Comment Letter I66: Pamela Yeiser, October 15, 2021

Comment#	Comment Text	Response
I66-1	Where will the water come from for the proposed project?? I am all for an bit of safe parking and passive trails, but this is way to much.	The County appreciates the comments submitted on the Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, which discusses the conservative measures for water supply and service boundary of PDMWD. No changes to the Draft EIR are needed.
I66-2	Please don't destroy the views of the grassland our community values & treasures. It is not replaceable.	As is illustrated on "before-and-after" photo simulations in Draft EIR Section 4.1, *Aesthetics and Visual Resources*, existing views of the project site would not be materially changed or diminished as a result of the project. No changes to the Draft EIR are needed.

Comment Letter I67: Carrie Zub, October 29, 2021

Comment#	Comment Text	Response
I67-1	I've been a resident in Alpine for 47 years. I grew up in Pella Verde which has to Lake Park tennis courts restrooms barbecue. Most homes and Alpine are on a larger scale and do you have Pools or Areanas, basketball courts. Alpine is it affluent neighborhood kids are in paid activities whether it be through school or their local communities that are not hanging out at parks anymore not here anyway. Why does every thing our eyes touch need to be built out can't there be one space where you can use your imagination. We have the casinos which have already brought a rougher crowd to our neighborhood stealing mail items missing vagrants drug use but putting a park in the middle of the most affluent area and Alpine as a matter of fact an aging area of Alpine put seniors at risk for theft speed no regard for our town you're bringing them right into the heart of our town. I worry that we will have to lock her doors because of a park that nobody needs nobody wants. Who has time to go to a park anymore let me let me start their when's the last time you said OK honey let's go to the park give me a **** break go to the beach go to Balboa Park go to Seaworld it's not like we live in the area that we have no access Beautiful activities we do so go do them but who has time for building this park is a dream of like Walt Disney we do not need a park we need open space for imagination for playful experiences for rocks and sunsets not concrete and structures. Respectfully yours Carrie Zub	The County appreciates the comments submitted on the Draft EIR. The commenter's opposition to the project is noted for the record. No changes to the Draft EIR are needed.

Comment Letter I68: August, Daniel, February 25, 2023

Comment#	Comment Text	Response
I68-1	I have lived my entire life in Alpine. I am 38 years old now and have always loved my hometown. I choose to live here because I love being in the rural Alpine community. I love the wildlife, the beautiful spaces and surrounding mountain vistas. I also love the peace and quiet afforded with living in a country atmosphere.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter states concerns related to traffic, noise, lighting, and high fire risk. The project's impacts on traffic, noise, lighting, and wildfire are discussed in the relevant sections of the Draft EIR and RS-Draft EIR. This comment does not raise specific issues related to the analysis of

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	If I wanted to live in the city, there are many to choose from, but I love my hometown. I do not feel that a huge mega park proposed on S Grade Rd will be favorable to our community. Many concerns are traffic on our rural narrow roads with (no shoulder or narrow shoulder), noise, lighting and high fire risk.	the environmental impact topics noted in the comment; as such, no further response can be provided. No changes to the RS-Draft EIR are needed.
I68-2	Our family has been in many of the fires in this community. We do not wish to have additional fire risk from a park of this size.	Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires. Please also refer to MR-9 (Wildfire) for additional information. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. No changes to the RS-Draft EIR are needed.
I68-3	We already have 11 baseball fields and sites for 6 full size soccer fields at school property. Why do we need more at this proposed park?	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I68-4	What we have always needed in this town is a high school, which we have never gotten. This regional park is not really for Alpine it is for San Diego County. If it was at a more suitable location, I do not think that the community would be opposed. At this time, I believe that the most appropriate park for this location would be a nature- based park, with picnic tables, and approximately 30 parking spaces (instead of 275), pet and child friendly.	The commenter's preference for a nature-based park is noted for the record. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter I69: August, Russ and Dawn, February 25, 2023

Comment#	Comment Text	Response
I69-1	My husband and I have been full time Alpine residents since 1975. We are both real estate Brokers and have been operating our own real estate office since 1979 in downtown Alpine. We have always supported planned growth in our community; however, the location of this proposed Regional Park is the wrong location.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I69-2	We are making our comments for the Alpine Regional Park proposal regarding the Draft Recirculated Environmental Impact report. Project objectives are deficient because this plan for a Regional Park in a rural portion of Alpine is not a community park but a Regional proposed Park.	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I69-3	How can tearing up 20-25 acres of natural preserve not be impactful to natural vegetation, wildlife, wildfire in an area that is rural residential?	Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not expose people or structures to significant risks associated with wildfires. Please also refer to MR-9 (Wildfire) for additional information. Section 4.4, *Biological Resources*, includes **APM-BIO-1: Establishment of the Open Space Preserve**, which, along with **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**, would reduce potentially significant direct and permanent impacts on sensitive vegetation communities to below a level of significance through habitat-based mitigation. No changes to the RS-Draft EIR are needed.
I69-4	Utility impact is still significant (See ES 36) regarding water demand and PDMWD cannot guarantee that supply of imported water would be diminished. And yet your mitigation for this issue is "MM-UTIL-2: Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits. Water availability shall be confirmed prior to issuance of building permits. The confirmation of water availability by PDMWD shall be provided in written form by PDMWD."	Please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, as well as MR-15 (Water and Wastewater), which discuss the CEQA analysis, particularly any impacts for water services. Impacts and mitigation measures are discussed in Section 4.19.4.3. Section 4.19.2.1 also discusses the water supply and service boundary of PDMWD. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The entirety of PDMWD's potable water supply is imported through SDCWA. PDMWD's 2015 UWMP projects the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including SDCWA, which provided imported water availability and regional water demands and conservation, and SANDAG, which provided the most recent demographic projections (2050 Regional Growth Forecast Update Series 13). SANDAG's Series 13 projections were used instead of Series 14 projections to assume the greatest level of future development. Table 4.19-1 shows

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		PDMWD's existing and projected water demand and estimated supply between 2020 and 2040 under normal weather conditions (PDMWD 2016). PDMWD's UWMP is updated every 5 years, at which time the projected supply and demand of potable water resources are reevaluated for the reasonably foreseeable future (i.e., 20-year planning period). The project would require an additional 50.5 acre-feet per year of water; however, water use would be reduced through water conservation measures identified in the UWMP. County DPR also received a water availability letter from PDMWD that confirmed adequate water supply would be available for the project site. Furthermore, **MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity** and **MM-UTIL-2: Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits** will be implemented to ensure there would be adequate water supplies for operation of the proposed park during the life of the park. No changes to the RS-Draft EIR are needed.
I69-5	How can you justify per your own DEIR report that 16,471,272.8 gallons of water is to be used for the park per year? That is an absorbent amount of imported water and not a conservation measure for our drought ridden County. While the taxpayers are expected to pay for this wasted water on landscaping for 8 acres. We are already burdened with high water bills to live here.	Please see response to comment I69-4, above. Please also see MR-15 (Water and Wastewater). No changes to the RS-Draft EIR are needed.
I69-6	"There would be no significant impacts related to wildfire" is not an accurate statement because implementation of the project would result in significant impacts related to wildfire. This area is labeled high fire risk. With the volume of people/visitors coming into our remote rural community (per your projected amount of 500 people coming per day and that is 3500 per week). This puts us at higher risk of fire for not only the proposed park, but Wrights Field (202 acres) which is labeled a Neighborhood Park and the surrounding rural neighborhoods. It is very challenging for Alpine residents to secure fire insurance as it is. The fire insurance policies are exorbitantly high already.	Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not expose people or structures to significant risks associated with wildfires. Please also refer to MR-9 (Wildfire) for additional information on controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I69-7	My husband and I see this for what it is. You, as the County, are supposed to be representing our community's best interest and yet this proposal is in the wrong location for the projected size of this proposed Regional Park. Your DEIR report is weak on mitigating the real concerns and issues of this rural community. Lighting, fire, traffic, safety for our residents and children as well as biological and preserving our rural atmosphere.	Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires. Please refer to MR-7 (Transportation and Safety), MR-9 (Wildfire), and MR-13 (Noise and Lighting). The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. No changes to the RS-Draft EIR are needed.
I69-8	Our family is supportive only of Option 5 Passive Park Alternative. However, the proposal that you have offered does not meet the needs of the Alpine Community as a whole. The community has expressed a need for a Passive/Nature based Park (with no lighting), child and pet friendly. Also, to include a picnic area, hiking and horseback riding with perhaps 30-50 parking spaces. The other options would and could be more desirable if they were located closer to the freeway and in the higher density zone to meet safety standards for bicyclists, pedestrians and children. A better choice location would be more accessible to mass transit too. Our windy, narrow, rural roads do not support Alternatives 2-4.	The commenter's preference for Alternative 5 and suggestions for other project alternatives are noted for the record. No changes to the RS-Draft EIR are needed.

Comment Letter I70: Bach, Brad, February 24, 2023

Comment#	Comment Text	Response
I70-1	Thank you for the opportunity to write to you offering my comments regarding the Alpine Park project.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I70-2	I have been a resident of Alpine for 20 years this coming August and have loved the Wright's Field / S.D. County Parkland and I do use it on a very regular basis. I was able to attend the initial planning meeting held at the Alpine Community Center and observe the comments being made at that meeting. Most of the	Please refer to MR-11(Public Outreach) for more information regarding the public outreach efforts conducted for the project. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	direction was coming from teen and preteen boys that seemed to be in favor of any and every development option that could be thought of. It didn't seem like a very good idea to let the project direction be too heavily swayed by this narrow demographic so I am glad to see that thoughtful alternative options have been introduced.	
I70-3	Of the choices offered my preference would be option #4. Given the overall impacts to the area I am very happy to see the skate and bike parks removed. Some major concerns of mine are thereby relieved. These include, fire dangers (resulting from smoking products, and other flammables), noise, potential for injury, excessive traffic into and out from the site, and the likelihood of numerous unsupervised youths.	The commenter's preference for Alternative 4 (Reduced Project Alternative) is noted for the record. Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. Smoking would be prohibited. No person would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park. Please also refer to MR-7 (Transportation and Safety), MR-9 (Wildfire), and MR-13 (Noise and Lighting). No changes to the RS-Draft EIR are needed.
I70-4	I also would hope to see very limited installation and use of lighting.	Please see MR-13 (Noise and Lighting) for more information on proposed lighting for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I71: Barrett, Robert, February 15, 2023

Comment#	Comment Text	Response
I71-1	I write in opposition to this proposal. As I understand it, this will carve a "park" out of a section of Wright's Field. Alpine already has a park and it is Wright's Field, which is well-used by Alpine residents who wish to experience the environment of nature. Putting in a concrete facility is not in tune with the natural environment. This project will greatly contribute to the urbanization of Alpine, which is a rural community. Such a serious alteration to	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record and will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	Wright's Field should be put to a vote of the people. Let them decide.	

Comment Letter I72: Bizzoco, Rick, February 2, 2023

Comment#	Comment Text	Response
I72-1	The last thing we need is the county government to step in and say we need to develop this area into a park for the people. We have enough of that destructive change for constructive purpose with housing construction alone. One of the worst examples is the County permitting apartments to be the front face of Alpine, to the detriment of the entire concept of Alpine as a village in the mountains. This is particularly evident in that the area around the once pristine Alpine Creek Shopping Center surroundings is now an "Apartment City." We should leave the Wright's Field property as is. I was part of the Back Country Land Trust when we all pitched in financially and individually and saved that property. It was agreed at that early time that Wright's Field would be held and kept as Wright's Field permanently, undeveloped. That was the promise we of the Back Country Land Trust made many decades ago when we acquired the property as a group. We should leave what is left of that land "as is." This might not be aligned with the County view of your role as a governing body, but it is right in my view as a 45 year resident of Alpine. I have seen unending destruction of all areas of Alpine by building house after house after house, as well as large developments at a fast pace. Now the County of San Diego comes in and says----- 'you need more----- we will do it whether you like it and whether you want it or not. It is your future, Alpine's future.' At this point, before it is too late, you, the County of San Diego, need to put the brakes on your lofty "Park" development right now! It is the worst project the County ever came up with. It completely undermines our idea of living in a "mountain town" in every way and in the worst way possible.	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record and will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I73: Bohmfalk, Adah, February 28, 2023

Comment#	Comment Text	Response
I73-1	Thank you for the opportunity to discuss the Alpine Park Project's Draft Environmental Impact Report (DEIR). I have lived in Alpine for over 20 years and I have become a good and educated steward of the land I use and the land around me. I have studied and learned about the intricate ecosystems here, the impact of the components of ecosystems and I have seen what happens when those systems go awry. Everything matters; from the dark night skies, to the wild creatures that need the night, to the plants and the very ground beneath our feet.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I73-2	I am concerned that an undeveloped open park that requires minimal development has not been proposed for this site. Why has this not been proposed as a valid and valuable option? I believe, as most of the folks here do, that Wright's Field and its surrounding land is a wild gem and one of the defining best assets of our town. And it is already a park. It's an amazing piece of nature that we are privileged to have and it would be best to share it as it is. Yes, we would benefit from a few improvements to make it more accessible and safer, but even this must be done with care and concern for the entire ecosystem. It would be most appropriate to use the field as a nature center with the goal of educating young and old alike to enjoy, appreciate and protect the natural world around us. It would be beneficial to improve the existing parking area and make it easier for people to walk and enjoy nature, but this acreage should be saved and used to educate our next generations about nature's delicate balances and the beauty of working ecosystems and to simply let nature be nature on a beautiful uninterrupted parcel of wild land.	As discussed in Chapter 6, *Alternatives*, of the RS-Draft EIR, five project alternatives were analyzed, including a no project alternative, a reduced project alternative, and a passive park alternative. The final decision on the project or alternative that would ultimately be implemented falls upon the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.
I73-3	How far are we willing to go to get this project done in spite of the findings? Any project, no matter the size, the scope, the purpose, must begin with exploration. If that exploration exposes significant issues, the project must be adjusted to these new-found limitations. If any of those issues prove to be insurmountable, the project must be scrapped. We are at a crucial point now as we look at installing playing fields, lights	Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park**.** No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	and infrastructure to support a formal sports park in Alpine; this simply is not feasible. We must be aware that the socio-environmental conflict here is simply too great and we must reckon with environmental issues getting tossed aside in the name of 'progress'.	
I73-4	What is the plan for mitigating the project's inevitable permanent destruction of flora and fauna which keep the area in balance? What will the further loss of corridors mean to all that lives on this land? What will happen when the predators cannot reach their prey? Section 4.4 states that the project does not maintain wildlife corridors, yet no mitigation is required. The ecosystem will respond to the further separation of prey and predator by becoming more unbalanced. We all know that when predators cannot get to their prey, the pest population booms. It is widely understood that disruptions in the predator/prey balance create problems to the very ecosystem they share. It's not just the animals in a live-or-die natural space; it's the plants, the trees, the very ground; all are affected. In addition to the flora and fauna, how will the neighbors on the 'prey side' protect their property from potentially massive increases in pest damage? And the homeowners on the 'prey side'; what is the plan for mitigating the loss of pets' lives and property damage? The health of the entire ecosystem hangs on these seemingly small and supposedly temporary losses. The plants here must also be protected and the policies/recommendations 'where feasible' and 'wherever possible' are not good enough.	Please refer to Section 4.4, *Biological Resources*, Subsection 4.4.4.3, *Project Impacts and Mitigation Measures*, for discussions regarding permanent impacts and mitigation for permanent impacts. Impacts on sensitive natural communities and special-status wildlife are disclosed in Section 4.4 of the RS-Draft EIR. Please see response to comment I98-6 for additional information on wildlife movement. No changes to the RS-Draft EIR are needed.
I73-5	In Alpine, we place great value on what's natural, what's normal; what 'nature intended'. Alpine is a dark sky town. We want to see the dark of night, we want to see the stars in that darkness, and that darkness is essential to the life being lived in this area right now. This land is a huge piece of darkness in the night. Lighting it up in any way will not just further damage the way in which prey and predator animals coexist, it will damage the very environment they live in. How will the excess lighting be made to fit into Alpine's character? How will that lighting be mitigated? We cannot simply add 'darkness'.	See MR-13 (Noise and Lighting) for more information on noise impacts. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I73-6	Perhaps the greatest factor discovered during the exploratory phase of creating a park at Wright's field is the fact that the land cannot be percolated. Attempting to tie into existing plumbing at the school or from behind Albertson's will simply further damage the balances, the ecosystems, that are the greatest part of the beauty of Alpine.	Please see MR-14 (Geology and Soils). The Geotechnical Evaluation discusses the presence of expansive clay materials at the site and the difficulties the contractor would have with working with these materials. No changes to the RS-Draft EIR are needed.
I73-7	Why must a heavily-developed park be located here at all? It is on a dangerous road in a quiet town. There is no need to pull people from surrounding communities where they have their own heavily- cemented skateparks and play places. The entire area here in Alpine is a beautifully balanced and natural ecosystem and there are real questions about its future to be asked at this point in the project.	Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park**.** No changes to the RS-Draft EIR are needed.
I73-8	Thank you for your consideration. I appreciate your time and attention and hope you will fix any and all unmitigated impacts in the final EIR. I stand with many many others who want to keep the beauty we have and hope that you will see that our mission to save the land for the future of peace and quiet is an honorable one and worth pursuing. Please include me as a recipient in all notices and matters relating to this project at asbohmfalk@yahoo.com.	This comment is acknowledged and will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I74: Bolz, Jacob, January 31, 2023

Comment#	Comment Text	Response
I74-1	Thank you for your continued support of this project. I have attended the public meetings over the last several years that have outlined the park and the effort that has gone into designing and implementing the Alpine Park. I want to be a positive voice in support, I have been very impressed with the plan and amenities this park will provide. I am aware there is a small but very vocal contingent that does not understand that project and thinks that all of Wright's Field 98 acres will be developed. This project will improve the land	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's support for the project is noted for the record. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	use, improve the traffic flow, and create a safe place for the Alpine community to gather. I have spoken with several businesses including the Alpine Ride Shop which is very active in the youth community of skaters and riders and this park would provide a safe atmosphere for the youth to gather and recreate in Alpine. Please don't give up on developing this park, it has met resistance, but overall there is so much support for this project, it should move forward as soon as possible.	

Comment Letter I75: Boyer, Judie, February 13, 2023

Comment#	Comment Text	Response
I75-1	My family and I along with others strongly oppose the scope of the $28 million all in one Sports Complex next to Alpine Wright's Field Ecological Preserve. We live close to Wright's Field Ecological Preserve and feel this is a poor choice of where to put a Sports Complex. Currently, as is, Wrights Field is a great asset to Alpine Community residents as well as to other San Diego residents. The Preserve is presently one of the few widely used and enjoyed by many every day as a place where they can come for quiet and nature at its best. The proposed sports complex would greatly impact the habitat and environment of the Preserve and surrounding area and take away from the many who are presently coming to enjoy the Preserve and all it has to offer.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's opposition to the project is also noted for the record. No changes to the RS-Draft EIR are needed.
I75-2	I feel the Sports Complex would be detrimental and greatly impact traffic on South Grade Road. There have been many accidents and even fatalities on South Grade Road and I fear that the increase in traffic on South Grade would greatly increase the number of accidents and fatalities. Traffic is sometimes already a problem on this two lane road.	Section 4.17, *Transportation and Circulation*, of the Draft EIR analyzed traffic impacts as a result of the project and determined there would be no significant impacts. Please see MR-7 (Transportation and Safety) for additional information on traffic impacts and roadway operation and safety. No changes to the RS-Draft EIR are needed.
I75-3	I also am concerned for the area residents who would need to use South Grade in emergency situations. For some, this road is the only route to exit if they need to evacuate their homes. Many	The Alpine Community Park Fire Evacuation Analysis was prepared for the project and included in Appendix K of the RS-Draft EIR. Please refer to MR-9 (Wildfire) for more information

Comment#	Comment Text	Response
	of the surrounding areas near Wright's Field Ecological Preserve are in high fire risk zones and close to forest boundaries.	on emergency response and evacuation and other controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.
I75-4	There is also the concern the new Sports Complex would have a negative impact on water consumption.	Section 4.10, *Hydrology and Water Quality*, and Section 4.19, *Utilities and Service Systems*, of the Draft EIR analyzed the project's impacts on water supply and groundwater recharge. Please also refer to MR-15 (Water and Wastewater) for additional information. No changes to the RS-Draft EIR are needed.
I75-5	Alas, I am not opposed to a smaller nature based "enhanced" passive park at Wright's Field that minimizes the impact on the habitat and environment of the present day beautiful rural park which so many presently enjoy. I feel that the allocated $28 million budget could be better utilized to build a Sports Complex near Alpine's town center or schools that doesn't heavily impact Wright's Field and the surrounding area, with a small part of the budget going toward developing an enhanced smaller nature based park at Wright's field.	The commenter's preference for a smaller nature-based park is noted for the record. No changes to the RS-Draft EIR are needed.

Comment Letter I76: Cecil, James, February 20, 2023

Comment#	Comment Text	Response
I76-1	We Alpine residents do not need or want the big changes the County is trying to impose on our areas around and near Wrights Field! We have several other facilities in the area , some at church's that the County can contract with for public useand enjoying. Cancel the proposal to develop these areas around Wrights Field in Alpine!	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's preference for no project at Wright's Field is noted for the record. No further response is required. No changes to the RS-Draft EIR are needed.

Comment Letter I77: Charvat, Jan, December 21, 2022

Comment#	Comment Text	Response
I77-1	thank you for allowing us to comment on the updated proposal for a community park in Alpine along South Grade Road. I've been living in Alpine since 2001 and very much enjoy its rural character. I am therefore not in favor of a large new construction, even a park. Alpine's population is not growing in any significant way due to the area being largely "zoned out", meaning that not many empty parcels are available for new residential construction. At least, that's my understanding of the situation here. As a result, the number of children is decreasing as they age, become adults and move away. Alpine never received a High School since it never reached the minimum number of prospective students required for such a project. Also, Alpine Elementary School and the Kindergarten closed a few years ago due to shrinking attendance numbers.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I77-2	The plans for a parking lot (in all alternatives except "no change" and "passive park") that would accommodate up to 250 cars is hugely over-dimensioned for Alpine's size and needs. I doubt we'd ever see more than half of those spaces used.	The number of parking spots provided is based on current park design guidelines and parking requirements. Parking spaces will not exceed 240 spaces. This is a comment on Section 4.17, *Transportation and Circulation*, which was not recirculated as part of the RS-Draft EIR. The comment also does not identify specific environmental impacts or address the adequacy or accuracy of the EIR. No further response is necessary and no changes to the RS-Draft EIR are needed.
I77-3	Looking at the Alternatives in the updated proposal, I vote as follows: #1 choice - Alternative 5 (Passive Park) 2nd choice - Alternative 3 (Reconfigured Project), since it moves the park to a lesser-used corner of the land and does not block access to the existing trails during the park's "closed hours". I don't like the plan to block access to existing trails "on the other side" of the park from South Grade Road when the park is closed.	The commenter's first preference for Alternative 5 (Passive Park Alternative) and secondary preference for Alternative 3 (Reconfigured Project Alternative) are noted for the record. No changes to the RS-Draft EIR are needed.
I77-4	I am OPPOSED to Alternative 2 (Sports Complex): in my opinion. it's too large for what Alpine needs today or in the future.	The commenter's opposition to Alternative 2 (Sports Complex Alternative) is noted for the record. No changes to the RS-Draft EIR are needed.

Comment Letter I78: Conway, Jerry, February 7, 2023

Comment#	Comment Text	Response
I78-1	• Did the Alpine Planning Group recommend this project? • If the project goes through the way it is proposed, would the boundaries of the proposed preserve land have a fire buffer? • Will there be fencing along the preserve boundary?	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The County has coordinated with the Alpine CPG, its Park's Subcommittee, along with other local Alpine interested parties through multiple public outreach meetings. Alpine Park is a public project and although a formal CPG recommendation is not required, the planning group voted to support the Alpine Park concept plan. The CPG recommended to address water use at the baseball field, coordinate with Alpine FPD and County Fire Authority, and investigate feasibility of an all-way stop at park entrances. The motion passed with a vote of 11 yes, 0 no, 1 abstention, and 3 vacant/absent. Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. Please refer to MR-9 (Wildfire) for information regarding wildfire factors and other sufficient controls that would be in place to reduce wildfire risks. County DPR would collaborate with BCLT to construct fuel breaks on the adjacent BCLT parcels. Furthermore, County DPR and its contractors would implement standard BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks. Fencing would not be included along the open space boundary; however, the project would involve trail closure activities along approximately 3,300 linear feet of existing informal-use trails. Access would be maintained across the project site, and trail closures within the open space portion of the project site would provide access to the existing trails in Wright's Field Preserve to be consistent with the Alpine Community Trails and Pathways Plan. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-4, Natural Resource Mitigation. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I78-2	Yes ma'am, that is the sum of the remarks I made. Only thing else I would add is that I doubt the Alpine community is in favor of all those proposed changes to that land, because when I went to the meetings, when they first came about, the majority of the people wanted to keep it a walking, hiking, horse riding area.	Please see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts and MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.

Comment Letter I79: DeGero, Gay, February 27, 2023

Comment#	Comment Text	Response
I79-1	Overall, this DEIR does not meet the goals for an Alpine Community Park in a reasonable and feasible manner, in my opinion. This applies to the size of the park, the alternative park ideas, the precarious environmental issues facing Alpine and the state of California, the activities/amenities, the maintenance costs, the mitigations and the oversight of the mitigations.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I79-2	Not to be ignored is the purchase by the County from the Apollo Group in Texas which became the Wright's Field Partnership on the day of the sale. All of this was not all made public to my knowledge. I have also worried about a possible conflict of interest with George Barnett and Travis Lyon both having seats on the Back Country Land Trust and the Alpine Community Planning Group which were instrumental in approving and supporting the big park project. Their resignation was called for by Yolaine Stout, a true guardian of Wright's Field. Was it ethical to have them on both boards? Any conflict of interest?	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I79-3	The Park proposed in this DEIR does not respect nor meet the objectives nor preferences of residents (Public Outreach Meeting #2) for an Alpine Community Park. The most preferred were :walking, jogging, nature, mountain biking, restrooms, dog park, shade trees, picnicking with picnic shelters, sidewalks, multi use trails and paved parking. . But this option was ignored and not included in this DEIR. Since #1 is No Park and #5 does not meet the objectives that leaves no more passive alternative	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of proposed alternatives to this project. No changes to the RS-Draft EIR are needed.

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	which would be in line with the results of the survey of Alpine residents.	
I79-4	This could have been accomplished within a 10 - 15 acre more passive alternative park plan using already disturbed land when possible rather than the 0.23 acre passive alternative #5 which does not meet the criteria. So why was it included? The alternative I suggest would be far less cost to build and maintain. The money savings could be used for other park projects in need of funds.	Alternative 5 – Passive Park Alternative was analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR. See MR-10 (Passive Park Alternative) for additional details on the Passive Park Alternative. No changes to the RS-Draft EIR are needed.
I79-5	According to the chart on p. 6-53 Alternatives #2,3 and 4 all increase the negative impact to all categories.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No changes to the RS-Draft EIR are needed.
I79-6	Which brings me to a quote from this DEIR, "The cost to maintain the Park are still being determined." What? The County and we, the people, are expected to approve a Park for which we do not know the cost??? Totally unreasonable!!! I certainly don't run my household budget this way. And the funds to maintain the park, though undetermined yet, are to come from 'day use fees and reservations?" This is the first time I've heard of these items and certainly would not be enough to really maintain a 26-29 acre park with all the amenities that are planned. I thought the Park was 'free.' Right?	General access to and parking for the Alpine park and open space will be free to the public. The project is funded through County General Funds. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I79-7	And by Public Outreach Meeting #3 the incorporated activities and amenities had been chosen. By whom? And then there was no looking back despite the loud cry to revisit the size and an overwhelming amount of activities and amenities which were definitely not part of a public decision. To me this felt like bullying and left me hopeless and helpless. I have doubts about the time and effort I'm putting into this response. It seems to me to be about personal, political legacies than we, the people, the residents, the public. I have seen no iota of listening or flexibility on the part of those who are supposed to represent us and what we want.	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.

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I79-8	The size of the proposed Park and the activities/amenities are more than the Community Park Alpine wanted. And the location is on a very dangerous road. This problem seems not to be of concern to the people pushing this for the Park. They are overlooking the speed with which people drive and the deaths that have occurred on this road. I don't consider this respectful to the public and not in good faith for the safety of the residents of Alpine. This site should never have been chosen, in my opinion.	Please see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. Please also see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community and details related to the sites the County considered prior to purchasing the property. No changes to the RS-Draft EIR are needed.
I79-9	In addition, California is experiencing drought conditions. To accept this DEIR would be a slap in the face of all Californians and certainly those of the East County. Our reservoirs are at all time lows and some are dry. How could the County consider the water use for the proposed park reasonable and feasible? The smaller park, using far less water, would be more feasible and reasonable to me.	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the RS-Draft EIR are needed.
I79-10	Which brings me to Mitigation and Mitigation Oversight. The list for the proposed Park mitigations is necessarily long. Whereas the smaller Park concept would require far less disturbance and less, if any, mitigation. And certainly more easily monitored. As opposed to this EXAMPLE in this DEIR:	The commenter's preference for the Passive Park Alternative is noted for the record. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I79-11For Impact-BIO-4: Significant Impacts on Western Spadefoot MM-BIO: 4 Western Spadefoot. The County will mitigate for impacts on one western spadefoot breeding pool, approximately 157 square feet in size, by creating three permanent basins, encompassing a minimum of 471 square feet, to support western spadefoot breeding. These constructed basins will be created within clay soils on the permanently protected lands on the County's parcel, no closer than 100 feet from the western edge of Alpine Park. Basins will be constructed within approximately 262 meters of the core breeding population on Wright's Field County of San Diego Department of Parks and Recreation Section 4.4. Biological Resources Alpine Park Project Recirculated Sections of Draft EIR 4.4-39 December	The majority of the comment consists of text copied from the RS-Draft EIR regarding western spadefoot mitigation. Regarding compliance of the biologists monitoring basins and spadefoots, as stated in Section 4.4, *Biological Resources*, of the RS-Draft EIR, monitoring and survey data will be provided to the County, CDFW, and USFWS by the monitoring biologist following each monitoring period and a written report summarizing the monitoring results will be provided to CDFW and USFWS at the end of the monitoring period each year. No changes to the RS-Draft EIR are needed.	

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	2022 to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins. No basins will be constructed within the areas proposed for QCB habitat enhancement activities. Hydrological analysis will be conducted prior to site selection to map the micro-watersheds in potential sites and ensure the constructed basins fill naturally with rainwater. Basins will be constructed to allow for maximum inundated depths of approximately 18 to 24 inches (20 to 60 centimeters), with the goal that they remain inundated long enough to increase the chances for breeding to be successful during dry years. Conversely, the newly constructed basins shall be designed in such a way that they support standing water for only several weeks following seasonal rains and aquatic predators (e.g., fish, bullfrogs, crayfish) cannot become established. Because ponding duration is so critical to the success of this effort, additional studies may be needed to estimate infiltration rates, soil profile, depth of clay soil layer, etc. The County will conduct these studies, as needed, to estimate the ponding duration within constructed basins. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s), as feasible. The County will develop a Western Spadefoot Habitat Mitigation and Monitoring Plan to describe requirements for the constructed basins, how basin sites are chosen, what activities will be conducted during the installation of the new basins, adaptive management, maintenance activities, access controls (e.g., fences), and what monitoring and reporting activities will occur and when. The data for the micro-habitat hydrological analysis will also be presented within this plan. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to the CDFW and USFWS for review and comment. The new basins will be constructed concurrently with Alpine Park, and western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint. Monitoring of the newly constructed basins will be conducted during the wet season (approximately December through April)	

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	at approximately weekly intervals, beginning with the first significant rain event each year for 5 years following completion of basin construction. The County's biologist will map the spatial extent of the basins, document the inundation depths of the basins and breeding outcomes, and determine if adaptive management is needed to increase survival and recruitment within the constructed basins. Notes will be made if egg masses or larvae are observed. One nocturnal adult survey will also be conducted in each of the 5 years when a breeding event is occurring in order to document the foraging/mobility patterns of western spadefoots in the area of the new basins. The County will also monitor the core breeding population on the Wright's Field Preserve, using the same methods described above (i.e., basin mapping, weekly checks, nocturnal survey) to document the population dynamics of the entire population over time. Monitoring/survey data will be provided to CDFW and USFWS by the monitoring biologist following each monitoring period; a written report summarizing the monitoring results will be provided to CDFW and USFWS at the end of the monitoring effort each year. Success criteria for the monitoring program shall include evidence of a ponding duration that is suitable for western spadefoot reproduction within at least one of the constructed basins during at least one of the 5 years of monitoring. After exclusionary fencing has been installed around all initial proposed ground- disturbing construction, but prior to initiation of initial ground disturbance, the spadefoot biologist will conduct at least three nighttime surveys for spadefoots within the fenced area. Surveys will County of San Diego Department of Parks and Recreation Section 4.4. Biological Resources Alpine Park Project Recirculated Sections of Draft EIR 4.4-40 December 2022 continue until no more spadefoots are captured and relocated out of the fenced footprint and/or upon the recommendations of the spadefoot biologist. These surveys will be conducted during appropriate climatic conditions and during the appropriate hours (i.e., nighttime, during rain events in breeding season) to maximize the likelihood of encountering spadefoots. If climatic conditions are not highly suitable for spadefoot activity, spadefoot habitat	

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	in the project footprint will be watered to encourage aestivating toads to surface. All spadefoots found within the project area will be captured and translocated by the spadefoot biologist to the nearest suitable habitat outside of the work area. Upon completion of these surveys and prior to initiation of construction activities, the spadefoot biologist will report the capture and release locations of all spadefoots found and relocated during these surveys to CDFW and USFWS ." This is only one of many mitigations which involve oversight by personnel. And there is no mention of who would monitor the compliance of the biologists.	
I79-12	Given the issues aforementioned, I am surprised that this DEIR is satisfactory, reasonable and feasible to the DPR and for the Board of Supervisors approval. I disagree.	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I79-13	**Annotations of documentation**. Purchase: https://www.10news.com/news/local-news/county-to-buy-preserve-98-acres-of-wrights-field-in-alpine "County Supervisors approved a $1.62 million purchase for 98 acres of land off of South Grade Road, with the intent to build a community park on part of the property and leave the rest alone as a public open space. George Barnett, the Director of the Back County Land Trust, says they would love to see a park built on the site because Alpine doesn't have a large community park within the city."How many towns in the whole world can say they have a 300-acre park in the middle of it?" he asks. "Maybe 10. That's how unique this is." Ethically necessary or acquired? "DPR has been working with the Alpine Community Planning Group and other stakeholders to find a suitable park location within Alpine since the 1990s. Many locations were evaluated and ruled out based on factors like their availability for purchase, size, street access and topography. The current site meets all criteria and only recently became available (please see	Please refer to MR-11 (Public Outreach) for more information regarding public meetings and the public outreach efforts in relation to the EIR. Please also see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community and details related to the sites the County considered prior to purchasing the property. No changes to the RS-Draft EIR are needed.

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	below for further details). Why this location, and not somewhere else? For years, other potential park sites were reviewed and ruled out based on a variety of factors. Out of respect to the confidentiality of those sellers, we are not able to release their information. This particular property fit all search criteria – and offered much more acreage than other sites, making it possible to build a mix of passive and active recreation opportunities – but it was not available until 2019. When it became available, DPR pursued the acquisition with the approval of the County Board of Supervisors (BOS)." vc " On Feb. 27, 2019, DPR submitted a letter to the BOS to request funds to purchase the 98-acre parcel of land, with intent to build an active recreation area on site. READ THE BOARD LETTER. The request was approved, leading to the purchase of the property from Wright's Field Partnership, LLC on March 4, 2019. Frequently Asked Questions: Alpine County Park County of San Diego Department of Parks and Recreation Last update: Feb. 2, 2021 Page 3 of 13 The site has always been earmarked for active recreation. However, of the 98 acres, only about 26 will be developed for that purpose; the rest of the land, which serves as a natural barrier between the proposed active recreation area and Wright's Field, will remain open space preserve. By purchasing the land for a park, the County prevented it from becoming a master planned community or other large development. It is protected as a park, in perpetuity. Its size, breadth of amenities, and open space trail system are designed to meet both the current and future needs of the community. Why was this park first presented as a 12-15 acre park, and is now larger? Early conversations about the search for a park in Alpine may have referenced smaller acreage, however, the purchase of the 98-acre parcel made it possible to expand acreage opportunities for both active and passive use. "Always earmarked for an active park" Really? The County had apparently been negotiating the purchase of Phase IV of Wright's Field with Apollo Growth Group Ltd. prior to the LLC being created in Dallas, Texas.	

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	https://opencorporates.com/companies/us_tx/0802888384 On February 14, 2018, Apollo Growth Group transferred Phase III of Wright's Field to Wright's Field Partnership LLC in Dallas, Texas. Almost a year later, the County of San Diego on March 4, 2019 recorded an option to purchase this parcel from Wright's Field Partnership LLC. Wright's Field Partnership, LLC legally FORMED on March 4, 2019. Ethical Question? https://www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html 12-16-2022 DEIR https://www.sdparks.org/content/dam/sdparks/en/pdf/Development/alpine-park/9_Section%206_Alternatives_Recirculated%20Draft%20EIR_2023_Text%20Rec.pdf From Recirculated DEIR 12-16- 22 Section 6 Alternatives 6.1, 6.2,6.4, 6.6, 6.7 and Table 6-1. Environmental Resource Project Determination Alternative 1: No Project Alternative 2: Sports Complex Alternative 3: Reconfigured Project Alternative 4: Reduced Project Alternative 5: Passive Park Table 6.3 Page 52, 53 Summary of Significant Effects of the Project Page 52, 53 of Table 6.3 Executive Summary Alpine Park Draft Environmental Impact Report September 2021 Table ES-4.1,4.2, 4.3, 4.4,4.5,4.6. Project Impacts and Mitigation Measures https://www.sdparks.org/content/dam/sdparks/en/pdf/Development/Alpine%20Park%20FINAL%20for%20print.pdf 1-14-21 PUBLIC OUTREACH MEETING #2 ALPINE COMMUNITY PARK Page 7 of pages 1-25 Survey results of what people enjoy doing in Alpine. Activities/Amenities. https://www.sdparks.org/content/dam/sdparks/en/pdf/Development/Updated%20Alpine%20FAQ%20%202.2.21.pdf p. 2 and 3 of 13. 2-2-21	

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	DPR has been working with the Alpine Community Planning Group and other stakeholders to find a suitable park location within Alpine since the 1990s. Many locations were evaluated and ruled out based on factors like their availability for purchase, size, street access and topography. The current site meets all criteria and only recently became available (please see below for further details). Why this location, and not somewhere else? For years, other potential park sites were reviewed and ruled out based on a variety of factors. Out of respect to the confidentiality of those sellers, we are not able to release their information. This particular property fit all search criteria – and offered much more acreage than other sites, making it possible to build a mix of passive and active recreation opportunities – but it was not available until 2019. When it became available, DPR pursued the acquisition with the approval of the County Board of Supervisors (BOS). On Feb. 27, 2019, Frequently Asked Questions: Alpine County Park County of San Diego Department of Parks and Recreation Last update: Feb. 2, 2021 Page 3 of 13 The site as has always been earmarked for active recreation. However, of the 98 acres, only about 26 will be developed for that purpose; the rest of the land, which serves as a natural barrier between the proposed active recreation area and Wright's Field, will remain open space preserve. By purchasing the land for a park, the County prevented it from becoming a master planned community or other large development. It is protected as a park, in perpetuity. Its size, breadth of amenities, and open space trail system are designed to meet both the current and future needs of the community. Why was this park first presented as a 12-15 acre park, and is now larger? Early conversations about the search for a park in Alpine may have referenced smaller acreage, however, the purchase of the 98-acre parcel made it possible to expand acreage opportunities for both active and passive use. https://www.sdparks.org/content/dam/sdparks/en/pdf/Development/Alpine%20FAQ.pdf 8-16-22	

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	Public Meeting #2 on Aug. 29, 2019: The second meeting reported the community's priorities for amenities based on feedback received at the first meeting. Park concepts were shared, featuring attractions that reflected those preferences. Those who could not attend were provided with a link to an online survey, where they could rate options, amenities and provide comments. p 4 of 14 Maintenance fees: The cost to maintain the park is still being determined. b Park maintenance can be funded a variety of ways. Departmental funds, day-use fees, and private reservations are some examples of how park money cycles back into the park budget." p 3 of 14 Frequently Asked Questions: Alpine County Park County of San Diego Department of Parks and Recreation Last update: Aug. 16, 2022 https://thealpinesun.com/barnett-lyon-must-resign-their-posts/ Question of Ethics? https://www.eastcountymagazine.org/back-country-land-trust-bclt?fbclid=IwAR3KA4DWGO2KZbX2uqam_HMy3cUSH0Czx_9nf3C6wFFV9uf11mrPYm9-Uh4 Question of Ethics?	

Comment Letter I80: Figari, Christine, February 27, 2023

Comment#	Comment Text	Response
I80-1	Thank you for the opportunity to comment on the recirculated DEIR for the Alpine Park Project. My comments and questions are below.	The County appreciates the comments submitted on the RS-Draft EIR. This is an introduction for the following comments. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I80-2	While in the recirculated Executive Summary and Section 4.4 I find approximately 20 references to the "Alpine Preserve" I'm not able to find any reference to this in the original sections of the DEIR.	The terms "open space/preserve" and "Alpine Preserve" both describe the approximately 70 acres of land adjacent to the 25-acre active park area that would be preserved for habitat restoration and enhancement. Editorial changes to the Draft EIR and RS-Draft EIR were made to consistently use the terms "open space" and "Alpine Park Preserve."

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I80-3	1. What is the Alpine Preserve? 2. Why was this added to the recirculated DEIR?	Please see response to comment I80-2 for information regarding the term "Alpine Preserve." Editorial changes to the Draft EIR and RS-Draft EIR were made to consistently use the terms "open space" and "Alpine Park Preserve."
I80-4	In MM-BIO-3 you state, "The County DPR shall seek a Section 10 Incidental Take Permit (ITP) for impacts on QCB-occupied habitat and comply with any additional mitigation required by the ITP."	The comment restates **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** and does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I80-5	1. Have you applied for the ITP? If so, when did you apply? If not, when do you expect to apply? 2. How long do you expect it would take to receive the permit? In other words, what impact will seeking the ITP have on the timing for beginning construction of a park? 3. What are your plans if you don't receive the permit?	A USFWS ITP for impacts on QCB will be applied for upon project approval. The County has been working closely with USFWS regarding the ITP. It is unknown how long it would take to receive the ITP; however, construction activities would not occur until the ITP is secured. No changes to the RS-Draft EIR are needed.
I80-6	In the Operations section you state, "The bike lanes would act as a by-pass in an emergency situation." There are currently no bike lanes on that section of South Grade Road. There is a bike route (Class III), with multiple signs along that entire stretch of road that have an image of a bicycle and say, "MAY USE FULL LANE". Since Class III bike routes provide shared use with motor vehicle traffic within the same travel lane, there are no additional lanes to use.	The project does not include the implementation of bike lanes. Exiting county roads permit bicycle use. The Final EIR has been revised to clarify that bike lanes are not included in this project. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.
I80-7	1. What bike lanes are you referring to? 2. If you're referring to bike lanes that will be constructed on that section of South Grade Road, when will they be constructed? 3. If there will be no bike lanes, what will be the emergency by-pass?	Please see response to comment I80-6, above. No changes to the RS-Draft EIR are needed.
I80-8	In several places you state that population density in the central Alpine CPA is projected to increase by 61% by 2040 and you cite this figure in determining whether an alternative meets or doesn't meet at least two of the project objectives. While this population increase is based on the County Parks Master Plan, the source for this statistic is cited as SANDAG, 2014 Estimates	The PMP found the Alpine CPA to have a deficit of local parkland. See MR-12 (Parks Master Plan) for more details related to the need for park facilities. CEQA Guidelines Section 15125(a)(1) states, "the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published." The Draft EIR utilized SANDAG Series

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	and Series 13 Forecasts. These figures are now likely to be seriously out of date.	13 because that was the latest available SANDAG model when the NOP was posted on March 30, 2021. Additionally, the first set of data from the 2020 Census, which included only population data at the state level, was not released until April 26, 2021 (U.S. Census Bureau 2023). More detailed population data were not released until August 2021. As such, the 2020 Census data were not available at the time the NOP was published and for that reason were not used in Draft EIR. No changes to the RS-Draft EIR are needed.
I80-9	1. Using current estimates and forecasts, what is Alpine's population projection for the future? 2. What changes will you make in the analysis of the alternatives to reflect the updated estimates and forecasts? 3. What changes will you make in the project plan to reflect the updated estimates and forecasts?	Please see the response to comment I80-8 for why the Draft EIR utilized SANDAG Series 13. SANDAG's Series 13 projections were used instead of Series 14 projections to assume the greatest level of future development. No changes to the RS-Draft EIR are needed.
I80-10	In responses to the DEIR many Alpine residents, including myself, requested a park alternative that would reflect the rural nature of the area, be a smaller, nature-based park, still meet the project objectives and have a significantly lower environmental impact.	Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in RS-Draft EIR. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. No changes to the RS-Draft EIR are needed.
I80-11	In addition, according to DPR's own data, questionnaires from the outreach meeting held in May, 2019, revealed that out of 24 options the top eight activities the responders selected were, in order of preference: • Walking/jogging • Riding a mountain bike on a trail/in a park • Nature (*Note: In the questionnaire, "Nature" was defined as "birdwatching, sketching/painting, photography, reading, writing") • Dog park • Picnicking • Exercise on fitness station • Playing on natural play elements (nature play)	This comment is acknowledged for the record. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. Please refer to MR-11 (Public Outreach) for more information regarding public meetings and the public outreach efforts in relation to the EIR. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	• Riding a horse	
I80-12	While I appreciate that you added an Alternative 5, it's difficult to understand how the alternative of a ".23- acre passive park" can be considered a park. Your description sounds more like open space or a preserve and is, therefore, not a reasonable alternative to the proposed park plan.	Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in RS-Draft EIR. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. In response to the passive park alternative, the County has many passive parks that are similar in size and with similar amenities that were included in Alternative 5. These existing County passive parks include access to trails and a parking area/staging area. Examples of other County passive parks include Morrison Pond, Santa Ysabel, Flume Trail, and Sweetwater. No changes to the RS-Draft EIR are needed.
I80-13	1. What definition of a park are you using that supports the idea that this ".23-acre passive park" could be considered a San Diego County park? 2. Given the comments from many Alpine residents requesting a passive park, in addition to your own data which clearly supports this, why did you not present a reasonable alternative that would meet most of the objectives and have a significantly lower environmental impact? 3. Please provide another alternative that reflects the rural nature of the area, is a smaller, nature- based park, meets the project objectives and has a significantly lower environmental impact.	Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in RS-Draft EIR. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. No changes to the RS-Draft EIR are needed.

Comment Letter I81: Figari, Robert, February 19, 2023

Comment#	Comment Text	Response
I81-1	As a resident of Alpine, I request responses to my concerns and comments as raised in this letter and the attached copy of my original DEIR Comments (DEIR_Alpine_rFigari_Comments). I do not believe the RS properly addresses or resolves the issues raised in my original comments letter or those provided in this letter. This letter includes further discussion of the two areas covered in my original letter regarding inadequate CEQA fulfillment. The first concerns the population basis used in developing the Project and the second discusses the inadequate alternative plan.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's concerns for the project are noted for the record and will be addressed in response to specific questions below. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter also included a copy of comments submitted on the Draft EIR, which the County responded to in the Final EIR and do not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I81-2	**Population** The RS continues to use outdated population data and data projections to support the size and scope of the park. Current research shows that Alpine simply does not have the size of population to support the building of this regional sized park. The San Diego County Parks Master Plan (PMP), US Census data and the new SDAG Regional Plan data clearly show that current, as well as projected population in the Alpine area is much lower than the data used as the basis for the park design. And the RS continues to ignore the increased "graying" of the Alpine population in the activities and elements it proposes in the Project.	Please refer to response to comment O10-5 and MR-12 (Parks Master Plan) for additional information on the current deficit of local parks in the Alpine CPA. Please also see the response to comment I80-8 for why the Draft EIR utilized SANDAG Series 13. No changes to the RS-Draft EIR are needed.
I81-3	And, why doesn't DPR take the County's plan to reduce suburban development into consideration in its population estimates? Lastly, if the County is pushing for a mileage tax in order to nudge citizens into driving less distances to reduce emissions, why would you design a large regional style park in far off Alpine?	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I81-4	**Alternatives** Starting on page 3 of my original DEIR comments, I address your elimination of Alternative 1 and lack of providing a viable alternative that 1) follows the recommendations made in the San Diego County Parks Master Plan (PMP) which would	Robert Figari's comments on the Draft EIR were addressed in responses to comments I16-1 through I16-7. No further response is needed. No changes to the RS-Draft EIR are needed.

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	significantly lessen environmental effects, that 2) matches the results of the initial DPR public outreach sessions before you developed your own divergent plan and that 3) follows the spirit of the CEQA law's intent.	
I81-5	I was surprised to see that the RS adds a Passive Park Alternative 6.1 that simply adds a parking lot to the original alternative that was rejected. How does merely adding a parking lot to the rejected alternative solve the objection you raised that "This alternative was rejected because it would not meet many of the project objectives, including creating a place where all Alpine residents can gather and connect as a community."?	Alternative 5 (Passive Park Alternative) was included and analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR in response to comments received on the Draft EIR. Please refer to response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives. No changes to the RS-Draft EIR are needed.
I81-6	Again, I ask, why didn't you create an alternative derived from the park elements Alpine residents provided in the first two public outreach sessions (before you interjected your own park elements), which in turn mirror what the PMP research recommends: a park with mostly passive and mid active elements? What is so complicated about creating a park alternative that is limited to picnic areas, a natural amphitheater, play areas for children, informal play field, trails for hiking and riding, nature study and other low impact activities?	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I81-7	You rejected the original alternative because "it would not meet many of the project objectives". CEQA's actual requirement is that an alternative must meet "most of the basic project objectives" or is infeasible. "Most" and "many" are two entirely different criteria. It is disingenuous to use "many" as your criteria in developing an alternative. It is not serving the public interest to create a straw dog alternative that you know doesn't qualify. You are required to provide meaningful alternatives that meet "most" of the criteria. You could have added to the rejected alternative the minimum park elements that are necessary to meet "most' of the objectives and that are feasible. You could have used a totally passive park as the foundation and added elements per your PMP research recommendations and the	Please refer to MR-10 (Passive Park Alternative) for more information about the passive park option. The commenter does not specify which is the "original alternative." However, the Alternative Location Alternative was rejected because it not only would not meet many of the project objectives but also because it did not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine and therefore could not accomplish the implementation of a new park at other potential locations within a reasonable period of time. Similarly, the Equestrian Staging and Trails Only Alternative was rejected because it would not meet many of the project objectives, including Objectives 1, 2, and 5, because it would not provide a place where all Alpine residents can gather as a community, it would

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	stated desires of Alpine residents. Why didn't you develop a qualified and feasible alternative like I am suggesting?	not provide a variety of active and passive recreational uses or open space, and it would not enhance the quality of life in Alpine by providing exceptional park and recreational opportunities. Five alternatives were analyzed and included in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I81-8	The RS also ignores the recent improvement of dilapidated playing fields at Joan MacQueen Middle School, which adds a bonanza of baseball and soccer opportunities for the community. Why doesn't the RS include a new alternative plan that reduces the size of fields in a proportionate way?	Please see response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives in compliance with CEQA requirements. No changes to the RS-Draft EIR are needed.
I81-9	Again, I don't feel that the DEIR or RS have addressed the issues I raised in my previous comments or this letter. The DEIR and RS fall short of what CEQA seems to require. The County uses outdated and incorrect population data as a basis for the park Project. The Project and plan alternatives do not match the objectives and requirement of other County regional plans, policies and park objectives. The wishes of Alpine residents seem secondary to the County's own desires for a park.	This is a summary comment and does not contain any new, substantive comments. All of these comments have been addressed in responses to comments I81-2 to I81-8 above. No changes to the RS-Draft EIR are needed.
I81-10	I cannot support the Project as presented. However, I wish to make it clear that I support a more passive park with elements more representative of the needs and desires of our community. I would be more than happy to assist in any way to make this possible.	The commenter's opposition to the project and preference for a passive park are noted for the record. These comments will be provided to the County of San Diego Board of Supervisors to support its decision. No changes to the RS-Draft EIR are needed.

Comment Letter I82: Flora, Diane, February 7, 2023

Comment#	Comment Text	Response
I82-1	Hi Anna. I just have a quick question. Currently we walk/hike frequently at Wright's Field. It looks like the park will take up part of our walking area but we would still have places to walk/hike. My question is if we were going to walk/hike after the park is completed where would we park? It looks like the park encompasses land all the way to the housing area. We usually park on South Grade on the border of where the park will be on the east side of Wright's Field. Would we be able to	The County appreciates the comment submitted on the RS-Draft EIR. There are 1.1 miles of existing multi-use trails and access roads that would be maintained in perpetuity within the open space area. Figure 3-1 in the project description identifies the existing trails to remain. An RMP will be developed prior to formalizing trails and before opening the open space to the public. A parking area capable of accommodating no more than

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	park our vehicles in Alpine Park to walk/hike Wright"s Field? Thanks!	240 spaces would be available for use. No changes to the RS-Draft EIR are needed.

Comment Letter I83: Funtas, Michael, February 4, 2023

Comment#	Comment Text	Response
I83-1	The following comments are with the Alpine Park environment in mind. I want to say that my wife and I have visited Lindo Lake County Park in Lakeside and we think the county did a wonderful job in planning this multi-use park. We usually go during the day, while children are at school, and we observe hundreds of people enjoying the park, while walking, walking their dogs, and enjoying a meal in the beautiful surroundings. I attended the initial meeting in 2019 where a 13 acre park was proposed. At that meeting, the community members brainstormed elements that we would like to see included in a park in Alpine. That meeting and subsequent surveys and community input have stated that Alpine prefers a scaled down park than the one proposed. We support a park in Alpine, but have concerns about the following elements:	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's concerns are noted for the record and will be specifically addressed below. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I83-2	Park use by Seniors: A major need of seniors is having a safe place to walk. In fact, a walking trail is #1 on the survey. My understanding is that the only walking trails will be the existing trails in Wright's Field. These trails are rocky and uneven and risky for seniors. With the attraction of a county park, there will be additional horses, dogs, and bikes on those paths. The increased use of these existing trails will add to the destruction of the natural habitat of Wright's Field. Lindo Park has dedicated trails for walking that are graded and safe for walking. Shouldn't the plan for Alpine Park include safe, graded paths for walking within the park area?	As shown on Figure 3.2, *Proposed Active Park Concept Plan*, in the Draft EIR, there would be a multi-use trail around the multi-use turf area. The comment does not identify specific environmental impacts or address the adequacy or accuracy of the EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.

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I83-3	Skateboard/All Wheel Park A skateboard park did not receive high marks on the survey that was circulated. Many have concerns of the draw of a skateboard park. At Lindo Park during the middle of the day, I observed three individuals who appeared to be out of work young adult men.. I think you can appreciate my concern. Also, what is an "all wheel park?" Does this include electric bikes, hoverboards, mopeds, and electric scooters? These vehicles do not belong in a county park and create a hazard for others. There should be separate access and a divider (wall, burm, etc.) to the all wheel park and skate park so those on wheels do not endanger those who are on foot. We don't want the congestion caused by bikes, electric bikes, skateboards, scooters etc.that Lake Murray has in the Alpine Park.	An all-wheel area was one of the top ten amenities requested by community members during the public outreach process. No changes to the RS-Draft EIR are needed. 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 will be allowed in the all-wheel park. The facility will be fenced and gated to control access. A planting separation will further shield the all-wheel facility from the rest of the park.
I83-4	Baseball Diamond: Unlike Lindo Park, the baseball diamond is situated in the middle of the park and takes up a substantial area of the plan. Baseball is played 2 - 4 months out of the year tops. Alpine already has venues for baseball. There is one behind the community center. If the baseball diamond needs to be present, it should be on the outer edges of the park. This feature was #16 on the survey. Is it really needed?	The proposed location for the baseball diamond is shown on Figure 3.2, *Proposed Active Park Concept Plan*, in the Draft EIR. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I83-5	Traffic on South Grade Road: The greatest concern is for children as well as adults riding their bikes or walking on this dangerous road with blind curves. A major county park with an "All Wheel Park" and a skateboard park will be a major draw for residents of the community, especially children and teens, to access the park by bike, skateboard or by foot. There has already been a fatal accident on this road directly across from the proposed site. Additionally, this road is the only exit for over 250 homes that are located across from the proposed park. In the event of evacuation (which this area has experienced many times due to fire) this road will become easily congested and will interfere with safe evacuation. This site has been proposed as a staging area for biking events, causing additional road congestion.	Main access would be provided on the eastern side of the property at a new four-way stop-controlled intersection at South Grade Road and Calle de Compadres. A secondary entrance would be constructed at the southern end of the park as a driveway into and out of the parking lot. Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires. Please also refer to MR-7 (Transportation and Safety) for more information on roadway operation and safety and MR-9 (Wildfire) for more information on emergency response and evacuation. Further detail is also available in the Alpine Park Fire Evacuation

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		Analysis (Appendix K of the RS-Draft EIR) No changes to the RS-Draft EIR are needed.
I83-6	Thank you for the opportunity to comment on the County Park planned for Alpine. I hope you will take into account the wishes of the Alpine Community.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I84: Gould, Nina, February 28, 2023

Comment#	Comment Text	Response
I84-1	Please consider this notice, that I, and my family, residents of Alpine for 31 years, would prefer to have Wright's Field stand as it is.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I84-2	However, given that this option will be pooh-poohed, I vote for a passive park. We do not need to use more water resources--please remember, many of us are on wells, and the water tables decrease with more usage.	The commenter's preference for the Passive Park Alternative is noted for the record. No changes to the RS-Draft EIR are needed.

Comment Letter I85: Guishard, Tim, December 8, 2022

Comment#	Comment Text	Response
I85-1	I am not in support of most options offered by the County in the latest CEQA document.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's lack of support for options offered is noted for the record. No further response is required. No changes to the RS-Draft EIR are needed.
I85-2	As long as the County thinks there is climate change, that we have the power to change, how can a facility be constructed that would have a net carbon imbalance? Fact, solar panels require greenhouse gasses to be produced: while the materials are being mined and the panels are being	Please refer to Section 4.6, *Energy*, of the Draft EIR. During operation, solar panels that would be installed on site would produce energy for the project site. Annual electricity consumption from the project's components were estimated using CalEEMod. No changes to the RS-Draft EIR are needed.

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	constructed/shipped/installed, and then at the end of life when the panels must be disposed of. Thus solar is not the answer to a net reduction in greenhouse gasses. The proper design of facilities that do not require large quantities of resources long term, is a better idea.	
I85-3	I do not support the installation of: • Grass fields at this park, especially when we are being told by the Governor there is a drought and we need to curtail our water use to <50 GPD. o These types of grasses not only make our drought problems worse, they require electricity to be consumed to pump the water to our elevation. • Groundwater wells to irrigate the non-native grasses, that would be needed to support turf type sports fields. o Again electricity is involved, and DPR has proven that it can not properly maintain groundwater infrastructures at most of its existing facilities. • Any facilities that would require a full time support crew to maintain. o Electricity, water, sewer, and other resources that are needed to support any staff, can be reduced with a refined project scope.	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems* as well as MR-15 (Water and Wastewater). Water use for the project would be reduced through water conservation measures. The project would not use groundwater for irrigation or domestic or commercial uses. Groundwater may only be used in the event of a wildland fire on the project site. The project water source would come from PDMWD and would continue to implement existing water conservation measures identified in its UWMP, as required by the Water Conservation Act of 2020. The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to help reduce overall water demands within the PDMWD service area. Landscape design would include the installation of drought-tolerant native plants to reduce water demands for irrigation. Furthermore, water demand for irrigation would decrease over time as vegetation root systems are established. The consideration of utilizing reclaimed water for irrigation will be reviewed at time of construction. No changes to the RS-Draft EIR are needed.
I85-4	I do support the installation of: • A facility that is only open from Dawn to Dusk, with limited security lighting after dusk. o No after hours lighting that might be needed to allow the use of these facilities after dusk shall be installed. • Sports facilities, that are not already represented at other public facilities in the Alpine area, o PROVIDED these facilities do not need more than the 15" of annual rainfall that Alpine gets to maintain them in an aesthetically pleasing condition.	The commenter's preference for specific design implementations for the project site is noted for the record. No changes to the RS-Draft EIR are needed.

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	• Parking areas for people to access Wrights field
	  o Preferably unpaved
	• Hiking/biking trails
	  o Unpaved
	• Pavilions and other facilities that could be used by the public
	  o These should be constructed mostly of metal/concrete, to limit the amount of PM needed to maintain them.
	  o The installation of dry toilet facilities (no running water)
	• A very limited addition of green space,
	  o Provided that these plant materials can be maintained with natural rainfall, after they are initially rooted (2-years maximum irrigation).
	• A facility where no more than 2-crew members could maintain this facility part time, while providing the rest of their other time to other existing facilities in El Cajon or Lakeside.	

Comment Letter I86: Gula, Jonah, February 27, 2023

Comment#	Comment Text	Response
I86-1	Thank you for the opportunity to comment on the revisions of the Draft Environmental Impact Report ("DEIR") for the Alpine Park Project ("Project"). I was born and raised in Alpine, and I grew up visiting the proposed park site and adjacent Wright's Field Ecological Preserve ("Wright's Field"). My comments, questions, and responses to them should be made part of the public record for the Project.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I86-2	First, I would like to express appreciation for the substantial revisions to the DEIR's biological resources section regarding the Western Spadefoot. This was previously a significant oversight by the Department of Parks and Recreation ("DPR")	Section 4.4, *Biological Resources*, of the RS-Draft EIR and the BRR were revised to include this analysis. A western spadefoot survey report was also prepared and included in the RS-Draft EIR. Because impacts on western spadefoot from the project are

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	and its biological consultants from ICF. However, I still see several issues with DPR's plans regarding this sensitive species.	anticipated to be significant absent mitigation, a mitigation measure to reduce impacts on this species to less-than-significant levels was also included in the RS-Draft EIR. Please refer to MR-1 (Western Spadefoot Recirculation) for more information. No changes to the RS-Draft EIR are needed.
I86-3	In MM- BIO-4, why are studies on infiltration rates, soil properties, etc. of planned Western Spadefoot breeding pools planned to be conducted "as needed?" This seems like a deferral of mitigation, as this information should be required prior to construction on the Project site to ensure mitigation will be effective away from the park footprint. Why is the Western Spadefoot Habitat Mitigation and Monitoring Plan anticipated to be developed *after* the Project? If mitigation of the Project's impacts on this sensitive species are to be effective, and if DPR is to be held accountable for this, then this monitoring plan is required prior to Project construction. Otherwise, there is no standardized basis for post-construction monitoring. I am glad post-construction monitoring was added to the DEIR, but without a pre-construction monitoring scheme, the impacts cannot be accurately assessed from a scientific perspective. The unsystematic surveys conducted in 2022 are insufficient to compare with post-construction monitoring.	Please refer to MR-4 (Natural Resource Mitigation) for additional information regarding mitigation. Surveys for western spadefoot were conducted with appropriate rigor and detail by a qualified and experienced biologist during the western spadefoot's typical breeding season (January to May; Jennings and Hayes 1994) and included hydrology checks and basin surveys of the County parcel and checks of the reference population at Wright's Field MSCP Preserve; surveys began on a roughly weekly basis following the first rainfall event that resulted in ponding (February 24) and continued to end the of April. Detailed notes for each visit to the County parcel and Wright's Field MSCP Preserve and a detailed basin map are available in Appendix E, *Western Spadefoot Survey Report*, of the BRR for the project. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to CDFW and USFWS for review and comment. No changes to the RS-Draft EIR are needed.
I86-4	Finally, I find the mitigation methodology of watering the park footprint to draw up estivating Western Spadefoot to be highly questionable, both from the standpoint of effectiveness and conservation ethics.	It is common practice to make every attempt to find and relocate sensitive wildlife species known to occur within an area before ground-disturbing activities take place. Relocation activities often occur in coordination with state and/or federal wildlife agencies. No changes to the RS-Draft EIR are needed.
I86-5	*MM-BIO-3* Is the possible purchase of an off-site parcel for Quino Checkerspot Butterfly (QCB) in the future another case of deferred mitigation? MM-BIO-3 treats such action as if it will be a simple solution and will adequately compensate for the loss of habitat at the Project site. Acquiring an off-site parcel with an established QCB population will be logistically and financially challenging, and acquiring a parcel that just has potential habitat will not be sufficient mitigation. As I expressed in my	The FESA mandates that the ITP is only issued if it can be demonstrated that there is no adverse impact on the listed species. The FESA ITP process establishes the roles of USFWS and the lead agency. **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** provides the details that support the conclusion that mitigation will be adequately provided to address impacts on QCB. The performance standard is specified (i.e., no net loss of QCB host plants) and compensatory onsite mitigation and

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	first DEIR comment letter, development like this Project only serves to fragment populations, which limits dispersal abilities into potential habitat. So acquiring potential habitat has no guarantee of colonization by QCB and is therefore not a mitigation action. If this mitigation action is to be anticipated, specific parcels and details of the QCB and its habitat on these parcels must be detailed prior to Project construction.	monitoring standards are also included in **MM-BIO-3**. **MM-BIO-3** was revised in the RS-Draft EIR to make it clear that the County intends to provide compensatory mitigation, habitat restoration, and monitoring of QCB regardless of the status of the ITP. No changes to the RS-Draft EIR are needed.
I86-6	*MM-BIO-5* Why does this impact and mitigation assessment focus on the construction period and wholly neglect the permanent effects of the Project itself? The greatest impact is likely to be exclusion of sensitive species from the Project site following construction. Yet nowhere is this discussed in the DEIR. The single sentence inserted about Grasshopper Sparrows is also highly vague and appears to be a quick and sloppy insertion to satisfy my comments on the first DEIR.	Impacts from operation of the project are discussed in Section 4.4, *Biological Resources*, of the RS-Draft EIR. A total of approximately 22.2 acres of land (active park, leach field, and new fire fuel modification zones) are considered permanently affected. Please refer to MR-2 (Indirect Impacts on Wright's Field) for additional information concerning Wright's Field MSCP Preserve impacts. No changes to the RS-Draft EIR are needed.
I86-7	*MM-BIO-9 and Cumulative Impact* Compensatory habitat management ignores the impact of fragmentation on the project site for sensitive grassland species that have already been significantly affected by similar development projects in San Diego County. Therefore, why does the DEIR not consider any impacts of the Project to be cumulative (pg. 4.4-14)? Reduction of habitat patches and habitat fragmentation in San Diego County has been a long-term trend due to suburban sprawl. Once the Project site is developed into the proposed park, the habitat loss is not reversible, and contributes to the degradation of threatened southern California grassland habitat on a landscape level. Therefore, the Project has both permanent and cumulative impact, but the latter is not considered in the DEIR. This demonstrates the clear tunnel vision of this DEIR and its lack of meaningful ecological interest.	Please refer to Chapter 5, *Cumulative Impacts*, of the Draft EIR for a list of cumulative impacts of past, present, and reasonably foreseeable future projects and the project's contribution to these impacts. Specifically, cumulative impacts on biological resources are discussed in Section 5.3.4 and the analysis determined that the project's impacts would not be cumulatively considerable. Chapter 5 was not recirculated as part of the RS-Draft EIR. Therefore, this is not a comment on the analysis in the RS-Draft EIR and no changes to the RS-Draft EIR are needed.
I86-8	*Impact on Wright's Field* Despite the significant concern I expressed about the bleed-over impacts of the Project onto Wright's Field, the revised DEIR only briefly and lazily addresses this issue even though it is one of the most significant impacts of the Project. Table 4.4-2 does not	Wright's Field has its own formal and informal entrances that are not within the County's property, indicating that usage on Wright's Field is not wholly dependent on what occurs on the County's parcel. The County has acted in good faith in working with BCLT to design its trails specifically to reduce impacts on

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	even consider impacts to adjacent Wright's Field. Why does the DEIR suggest there will be increased foot traffic on the trails within the boundaries of the County's parcel but tries to make the case that foot traffic will not increase on Wright's Field? The authors of the DEIR fail to grasp that members of the public will not distinguish between the legal parcel boundaries–accessible trails will be used if they are connected, which means visitors to the park will follow them onto Wright's Field. So the DEIR's attempt to explain away the impacts of increased foot traffic onto the neighboring preserve property are highly unreasonable.	Wright's Field Preserve. The project would involve trail closure activities along approximately 3,300 linear feet of existing informal-use trails. However, because access would be maintained across the project site, trail closures within the open space portion of the project site would provide access to the existing trails in Wright's Field Preserve to be consistent with the Alpine Community Trails and Pathways Plan. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-2 (Indirect Impacts on Wright's Field) for additional information. No changes to the RS-Draft EIR are needed.
I86-9	On pg. 4.4-29, the DEIR authors also try to minimize the impact of the Project on Wright's Field by using the distance from the park to the preserve as a way of dissipating increased foot traffic. It suggests that a distance of 600-800 feet is a sufficient discouragement to visitors to walk all the way to Wright's Field. This is one of the most preposterous justifications in this revised section of the DEIR. Firstly, such a short distance is unlikely to be a discouragement to most visitors, especially those walking their dogs (or letting them run off-leash, which is guaranteed to happen), riding bicycles, and riding horses. After all, Wright's Field is already accessed from the proposed parking area for the Project and the distance is no hinderance to visitors. With the exponential increase in visitors that is expected, one can assume many will not find the distance a hinderance either. This attempt to downplay the impacts to Wright's Field is nonsensical and unfounded.	Please see response to comment I86-8, above. No changes to the RS-Draft EIR are needed.
I86-10	Finally, the attempt of the DEIR authors to invoke COVID-19 as a reason for increased foot traffic to Wright's Field has no place in this environmental assessment and demonstrates the lack of integrity and honesty in the assessment of impact on the adjacent property. The intention of the Project is to attract visitors to use the developed part of the park and trails, which will without a doubt increase the number of people using the trails and going into Wright's Field. This section of the DEIR is the most dishonest assessment of impact and was clearly only inserted to satisfy those of us who expressed concern in our	Please see response to comment I86-8, above. No changes to the RS-Draft EIR are needed.

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	initial comment letters. As it is, this section contributes nothing to a genuine assessment of impact.	
I86-11	*Local Regulations* How does DPR justify the Project's conflicts with local regulations and plans under section 4.4.3.3? For example, under GOAL LU-6 (pg. 4.4-10), the Project clearly is not in balance with the natural environment and its scarce resources. The Project site is characterized by dry, open habitat predominantly. The Project will (1) alter this by installing impervious surfaces that will impact groundwater uptake, (2) require substantial and unnatural input of water into the park area, and (3) plant trees (native or otherwise) that are not currently part of the site's habitat.	As discussed in Section 4.11, *Land Use and Planning*, of the Draft EIR, the project would be consistent with Goal LU-6 because the project would mitigate impacts on the natural environment and be designed to avoid impacts from natural hazards. Landscape design would also include the installation of drought-tolerant native plants to reduce overall water demands. As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, the project would not significantly affect groundwater recharge because of the implementation of stormwater retention basins and other BMPs. Furthermore, the majority of the project site (70+ acres) would be preserved to benefit native wildlife, natural habitat, and water resources. No changes to the RS-Draft EIR are needed.
I86-12	Under LU-6.1 beneath this local regulation, the Project clearly does not support long-term sustainability of the natural environment because it will result in a reduction of a patch of sensitive habitat that is important for maintaining sensitive wildlife species in a landscape where habitat has been increasingly fragmented. For the same reasons, the Project is in conflict with GOAL COS-2 (pg. 4.4-11), especially because it takes no interest in the impact on common species.	Please refer to response to comment I86-11, above. Please also see Section 4.4, *Biological Resources*, of the RS-Draft EIR, which discusses significant impacts on habitat and the mitigation measures proposed to reduce those impacts to less-than-significant levels. In addition, the project is consistent with the San Diego MSCP County Subarea Plan and the Biological Mitigation Ordinance that implements it within the Metro-Lakeside-Jamul Segment of the MSCP. The MSCP and Biological Mitigation Ordinance provide both the framework and the specific details on how the protection of sensitive natural resources will be carried out in the County subarea. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. See MR-4, Natural Resource Mitigation, for additional information. No changes to the RS-Draft EIR are needed.

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I86-13	DPR has continually cited the County's goals regarding park acreage per citizen, which is stated in GOAL COS-21. Why does DPR prioritize this goal over other local goals/regulations? The County's park metrics have much less priority for the overall population than goals about environmental sustainability, and DPR's insistence that the park metrics are sufficient reason for the Project are unacceptable.	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I86-14	In closing, I have several general questions about the DEIR. Throughout the revised DEIR, why is prospective language used such as "surveys would be conducted" rather than "surveys will be conducted?" This is likely just the way the authors write, but I find these details to be important for keeping DPR accountable. Please revise language throughout to highlight the real intentions of DPR.	This comment restates particular verbiage presented in the RS-Draft EIR. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I86-15	Why was my suggestion to use citizen science databases of wildlife and plant species not taken into account? Still the DEIR and its biological assessment only consider agency databases, which are far less comprehensive than citizen science databases like eBird and iNaturalist. Indeed, species that the DEIR considers as potentially occurring actually do occur on the Project site and adjacent Wright's Field based on these citizen science databases. Exclusion of these data shows a lack of due diligence on the part of DPR and ICF.	As found in Section 1.3, *Survey Methods*, of the BRR for the project, the literature and records search utilized the following sources, which are typically used for biological analysis for development projects: CDFW's CNDDB (CDFW 2020), including occurrences within 5 miles of the Biological Study Area; CNPS's Online Inventory of Rare and Endangered Plants, eighth edition (CNPS 2019); USFWS Carlsbad Fish and Wildlife Office species occurrence data (USFWS 2019); and SanBIOS sensitive species sightings (SANDAG 2019). No changes to the RS-Draft EIR are needed.
I86-16	I thank you for the opportunity to provide this meaningful input as it addresses significant holes in the DEIR and Project plan. I would like to receive all notices relating to this project at Jonah.gula@yahoo.com	This comment is acknowledged and noted for the record. No changes to the RS-Draft EIR are needed.

Comment Letter I87: Harmon, Kimberly and Tracey, February 2, 2023

Comment#	Comment Text	Response
I87-1	The proposed development of approximately 25 acres devoted to an array of activities solicited to "General Public" for comment should be directed to " Alpine residents". We as those	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the

Comment#	Comment Text	Response
	residents in Alpine have an unbroken 98 acres known as Wright's Field Preserve. The appealing quality of life here has no room to divide this space into multi use areas.	Final EIR for the project. No changes to the RS-Draft EIR are needed.
I87-2	Make no mistake, the impact of quality of life is broken with noise, pollution, traffic, loitering, the trash bins that need servicing with noisy and polluting equipment, signs for designated projects, closing of trails for sport events, and the list goes on.	See MR-13 (Noise and Lighting) for more information on noise impacts. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. A full-time, live-on volunteer, in addition to regular park ranger patrols, would be present to minimize risks of trash and garbage becoming an attractive nuisance for animal pests. No changes to the RS-Draft EIR are needed.
I87-3	Lack of this type of development is why Alpine is a charming place to live, enabling those to literally walk outside our homes to smell and taste fresh air, rest our eyes and minds in the unbroken space in nature, and listen for the quiet sounds of life. Please allow Alpine to be the 'escape' we all need in this small town community. "The bigger the piece of ground, the smaller amount of noise".	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.

Comment Letter I88: Hiebing, Gary, February 7, 2023

Comment#	Comment Text	Response
I88-1	If you would please take time to read the attached letter in opposition to the proposed Alpine Community Sports Complex and agreement that the proposed alternate #5 for a passive park per the draft environmental impact report be done in its place I would appreciate it. Thank you for your time and understanding	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's preferred alternative to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.
I88-2	I have been a resident of Alpine for over nine years and I'm the husband to a wife that was born and raised in Alpine. We are a young family and have three children. A thirteen-year-old son, eleven-year-old daughter and a five-year-old daughter. We are vehemently opposed to the proposed Alpine County Park at Wright's Field. Any development of Wrights Field or the County	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	land surrounding it should be voted on by the residents of Alpine.	
I88-3	A park of this magnitude is not justified in a community like Alpine. I have been involved as a coach over the years for both Alpine American Little League and Alpine AYSO and there is not a shortage of soccer fields or baseball fields in Alpine. As a coach, I never had any trouble finding a location to fill my practice slots for baseball or soccer. In fact, Alpine AYSO currently utilizes soccer fields just on the other side of Wright's Field at Joan MacQueen Middle School. There are also soccer and baseball fields at Shadow Hills Elementary and Alpine Elementary. We don't need any more baseball or soccer fields in Alpine.	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I88-4	This park would also be greatly underutilized and not need in a community the size of Alpine. Alpine cannot get a high school built because it lacks the number of required students. Just a couple years ago Alpine Elementary shut down due to low enrollment numbers and the existing students were sent to the other elementary schools in Alpine. Currently, on any given Saturday you can go down to the fields at Shadow Hills or drive by the smaller park next to Boulder Oaks Elementary School on Tavern Road and they are empty. This would be the same at this proposed park but at the expense of Wright's Fields natural beauty.	This comment compares Alpine Park to other projects and does not identify specific environmental impacts. No changes to the RS-Draft EIR are needed.
I88-5	Other major concerns are safety, logistics and infrastructure. The hard 90 degree turn on South Grade Road near Via Viejas is one of the most dangerous street locations in Alpine. You have speeding cars on South Grade, much slower traffic entering and exiting Palo Verde Ranch on Via Viejas and now this park could potentially create a new hazard of traffic and pedestrians. Infrastructure wise what are the costs and environmental impacts of getting utilities to the new park? If the park does not run of City water it would run off a well and further lower the aquafers many of the surrounding residents relay on. Also, all of the surrounding residents South and East of Wrights Field are not on City Sewer but on septic. Is a park this large scale going to	Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR as well as MR-15 (Water and Wastewater) for information on the septic system to serve the facilities and wastewater treatment. As stated in the Draft EIR, the project would not use groundwater and would be serviced by PDMWD. Also stated in the Draft EIR, an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the project site. This option would consist of connecting to the existing sewer line within

Comment#	Comment Text	Response
	be on a septic system and is this system compatible with this area environmentally?	Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. The existing sewer line is served by SDCSD. An onsite sewage treatment system is the second option for disposal of sewage associated with the project. The system would be in the northern portion of the project site, north of the equestrian staging area. Two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site with a capacity of 1,500 gallons and the other a main tank near the restroom in the northern portion of the project site with a capacity of 15,000 gallons. It is anticipated that the proposed septic system would have a capacity of 5,000 gallons per day. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. The selection of which sewage disposal option is most appropriate for the project will be made as the project proceeds into further detailed development. No changes to the RS-Draft EIR are needed.
I88-6	If the County is determined to spend our tax dollars on a new park in Alpine at this location, I would suggest the following. A simple decomposed (DG) granite parking lot with parking for a couple horse trailers . At most, level off the existing walking trails and cover with compacted DG or other natural terrain. This would allow for safe parking and still keep the natural beauty of Wright's Field. This falls inline with #5 Passive Park Alternate proposed in the draft environmental impact report.	The commenter's preference for a passive park alternative is noted for the record. No changes to the RS-Draft EIR are needed.
I88-7	Over the years there have been numerous proposals on what to do with this parcel of land all of which have been overwhelmingly rejected by the residents of Alpine in favor of keeping Wrights Field wild and natural. When considering the proposed construct ion of this park I request you ask yourself, why do people want to move and live in Alpine. The reason isn't because of all the amenities you might expect to find in suburban living like, shopping malls, restaurants and yes community parks. For me the reason, in fact, is the exact	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	opposite and lack of these things that makes Alpine special. This community has a feeling of a rural small mountain town and a sense of wilderness. That is what draws families like mine to Alpine. In Alpine when we want our kids to go outside, I don't want them playing on landscaped grass fields or concrete skateparks. I want them hiking in the bushes, climbing boulders and experiencing the outdoors in its natural habitat. Wright's Field is the center of Alpine, the heart of Alpine and a place that residents escape to. Walking through Wright's Field in the morning or in the evening at dusk with my family in its natural state reminds me of exactly why I live in Alpine and I don't want that to change.	

Comment Letter I89: Kusler, Heather, February 26, 2023

Comment#	Comment Text	Response
I89-1	I am writing in response to the DREIR for the Alpine Park Project. Repeatedly, Alpine residents have asked for and suggested a scaled back plan to this proposed park. We have asked for consideration of removing the sports complex aspect of this park, and constructing a "passive use only" park. A passive use park still has not been included as an option/alternative in this DREIR. It appears this park continues to be labeled as a "destination community park".	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. As discussed in Chapter 6, *Alternatives*, in the RS-Draft EIR, five project alternatives were analyzed, including a no project alternative, a reduced project alternative, and a passive park alternative. No changes to the RS-Draft EIR are needed.
I89-2	As you know, the miles traveled and the no growth initiative outside of the urban center of surrounding cities, is dramatically changing the length of destination most people are currently traveling. This park will most likely never support the idea of a "destination park" for the above mentioned.	The project's daily trips were provided in the Transportation Impact Study (Appendix I of the Draft EIR). CalEEMod defaults were used for the trip distances. As shown in Appendix B of the Transportation Impact Study (PDF page 110), these distances vary from 9.5 miles to 7.3 miles, with diverted, primary, or pass-by trips. No changes to the RS-Draft EIR are needed.
I89-3	The residents of Alpine would greatly appreciate this park centering around horse trails, hiking, mountain biking, and nature based activities, which would leave a much less environmental impact compared to huge grassy areas, sports	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No changes to the RS-Draft EIR are needed.

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	complex facilities, skateboard park, bike park, basketball and pickle ball.	
I89-4	The grass alone negates the idea of water conservation, especially when California is constantly enduring an ongoing drought, and wildfire threat.	Please see the responses to comments O8-76 and I85-3. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems*, as well as MR-15 (Water and Wastewater). Please also refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.
I89-5	Please reconsider the plans of this park, and create a passive use park for all ages to enjoy.	Alternative 5 – Passive Park Alternative was analyzed in RS-Draft EIR Chapter 6, *Alternatives*. Please refer to MR-10 (Passive Park Alternative) for further details. No changes to the RS-Draft EIR are needed.

Comment Letter I90: Light, Jeff and Alanna, February 25, 2023

Comment#	Comment Text	Response
I90-1	Enclosed are two letters - one responding to the Recirculation DEIR and the one we wrote in November 2021. Within this letter is extra information, wanted it to be included so that perhaps you can somewhat understand our frustration about how the ACPG and San Diego County put this together pretending it is for the benefit of all….pretending you listened to us….but in my opinion, and many others, outright lied to us.	The County appreciates the comments submitted on the RS-Draft EIR. The commenters' opposition to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenters also included a copy of comments submitted on the Draft EIR, which the County responded to in the Final EIR and do not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I90-2	Please look closely at the traffic situation if nothing else. If South Grade is not improved dramatically, subsequent traffic deaths will be attributed to your negligence.	Please see MR-7 (Transportation and Safety) for more information on transportation and safety efforts. No changes to the RS-Draft EIR are needed.
I90-3	First off, I would like to state that in my opinion, this park was created and pushed down taxpayers' throats for political agendas both in Alpine and San Diego County.	This comment is acknowledged. The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

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	As Mr. George Barnett wrote at the end of a letter to Judy Tijong-Pietrzak Dec. 30, 2020, "So we all are contractually together and well aligned as to goals and missions." (Full letter is included) I wrote an editorial that was published in East County Magazine almost two years ago. Nobody mentioned in this letter has disputed any of the research that I have done. Information was taken from public documents & media. Please read to understand why many are upset about how this park was created and for whose purpose.	
I90-4	*READER'S EDITORIAL: HUNDREDS PROTEST AS COUNTY PLANS $28 MILLION SPORTS COMPLEX ON ENVIRONMENTALLY SENSITIVE LAND IN ALPINE* *Wright's Field / Back Country Land Trust (BCLT)* *By Alanna Light, 25-year Alpine resident* *March 7, 2021 (Alpine) - For decades, Wright's Field in Alpine has been a target for development.* *Because of its rich natural resources and quality and diversity of plant and animal life, the land has long been protected from turning into a housing development, golf course, high school and an active sports park. But now a controversial proposal would allow a $28 million, 26-acre sports complex to be built adjacent to land preserved by the Back County Land Trust. (BCLT)* *Passionate residents Dave and Yolaine Stout, through the Backcountry Land Trust (BCLT), were able to protect 230 acres of Wright's Field. Their ultimate goal was to purchase the remaining parcel adjacent to it, which they referred to as Phase III of Wright's Field.* *The owner of Phase III, Apollo Growth Group Ltd., had tried to develop this land, but because of a number of reasons, including its biological sensitivity, it remained untouched.* *In 2006, George Barnett, chairperson of Supervisor Dianne Jacob's Alpine Revitalization Committee for Active Parks & Recreation and board member of the Alpine Community Planning Group (ACPG) wrote, "According to the County, the property (Wright's*	This letter is acknowledged for the record. Wright's Field is not the proposed open space portion of the project, and the County would be preserving land adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. Please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for the project's impacts on biological resources. Please also refer to MR-11 (Public Outreach) for additional details related to the County's public outreach process. Please also refer to MR-2 (Indirect Impacts on Wright's Field). No changes to the RS-Draft EIR are needed.

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	Field) contains substantial endangered and rare habitats posing important environmental sensitivity…." *He quoted from a letter to ACPG Chair Jim Mowry from Renee Bahl, Director of County Parks & Recreation, "The County has previously evaluated Wright's Field as a potential site for park development and determined that Wright's Field is not suitable for the development of an active recreation park…..our concerns regarding the biological sensitivity of the habitats within Wright's Field have not changed and we do not believe that Wright's Field is suitable for active parkland development."* *Barnett mentioned available active park locations that the County had found, one with a willing seller but Supervisor Jacob decided to stop all County work on active parkland development for Alpine "until the ACPG gets its act together."* *The County of San Diego has since changed its opinion about an active park on Wright's Field – and did so quietly and methodically – under the radar of a community passionate about its rural heritage and open grassland.* *On Dec. 22, 2017, journalist Karen Pearlman of the San Diego Union Tribune(link is external) wrote that Parks and Recreation Chief Jill Bankston said. "The department in the fall identified a parcel that may be suitable for a new park in Alpine…we are working with the property owner to gauge his interest in working with us," she wrote. "This site may be able to accommodate both active and passive recreation."* *There was no mention of Wright's Field in the article.* *Barnett, whose ultimate goal(link is external) has always been "to get a large county-owned sports park for Alpine," is also a board member of the BCLT in charge of land acquisition. It was his job to acquire Phase III of Wright's Field, the same parcel the County targeted for a sports park. The same parcel that the County said wasn't "suitable for the development of an active recreation park."* *The day before the Union Tribune article came out, Wright's Field Partnership LLC was created in Dallas, Texas.*	

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	Based on this timeline, the County had apparently been negotiating the purchase of Phase IV of Wright's Field with Apollo Growth Group Ltd. prior to the LLC being created in Dallas, Texas. *On February 14, 2018, Apollo Growth Group transferred Phase III of Wright's Field to Wright's Field Partnership LLC in Dallas, Texas.* *Almost a year later, the County of San Diego recorded an option to purchase this parcel from Wright's Field Partnership LLC.* *On February 27, 2019, the County of San Diego submitted a Land Use Agenda Item to the board of supervisors. It stated that the County intends to build an active park on this site and "seek to enter into a maintenance agreement with a partner organization using a partner evaluation model to operate and maintain the portions of the land that will be preserved."* *Based on this information, it is no surprise that Barnett would be supportive of this transaction. His top priority of getting a County Sports Park is now checked off his political to- do list and he partners with the BCLT to maintain the leftover passive land. It's a win/win for Barnett.* *Former Supervisor Dianne Jacob voted for the park and certainly Barnett, representing the ACPG's Parks, Trails & Conservation Subcommittee likely knew about it as well. Prior to the vote, in a 10 News interview with Jerod Aarons(link is external), Jacobs said, "We add to Wright's Field, we add to the open space amenities, in the community, and at the same time, we have enough property to have active recreational opportunities for children, families in the community."* *Although a plus for Barnett, his support for the project comes at the expense of those in the community who feel the existing sports facilities in Alpine should be refurbished and maintained. He does this at the expense of those who moved to Alpine to enjoy a rural lifestyle, who enjoy open space and expected a smaller, community park. He does this at the expense of a biologically sensitive grassland that he previously said was not a viable spot for an active park.*	

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	Initially, residents were told that the County Alpine Park would be between 10 and 15 acres, which made sense and was accepted by many residents. However, it almost doubled in scope once the land was purchased. *In the County's Frequently Asked Questions: Alpine County Park(link is external) it states that "Early conversations about the search for a park in Alpine may have referenced smaller acreage, however, the purchase of the 98-acre parcel made it possible to expand acreage opportunities for both active and passive use."* *While there are residents in Alpine who would welcome the recreational opportunities in an active sports park, such as baseball, basketball and skateboarding, such activities could occur in a different location, not necessarily an environmentally sensitive site that many in Alpine have long fought to protect.* *Alpiners have suggested multiple smaller parks, with a skateboard/bike park easily accessible to children.* *The proposed park is located on South Grade Road, which is one of the most dangerous roads in Alpine. Multiple people have died(link is external) on this road and recently, a 19-year-old was a victim of a hit and run accident(link is external).* *The County's response to multiple parks was "Putting park amenities in a single area is more cost-effective and centralizes resources for better maintenance over time." Barnett promotes this park without analyzing traffic safety, wildfire risk and where they would obtain the water source for the playing fields and landscaping.* *Unfortunately, most residents never knew or read the County letter(link is external) stating they wanted to build an active park on it.* *It wasn't until 2021 that the County posted a link to it on their website under "Frequently Asked Questions: Alpine County Park."(link is external)* *Alpine residents were unaware that the community meetings, which occurred after the County decided to build an active park on Phase III of Wright's Field, were held in compliance of Policy I-44(link is external). "The Department of Parks and Recreation, in*	

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	conjunction with the designated community advisory group…shall hold a minimum of two community workshops regarding the proposed park design project in the affected *community."* *There is no mention in this policy that the County has to listen or put in effect what the community wants.* *The County just has to hold two meetings to be in compliance of Policy I-44.* *On September 23, 2020 residents got their first glimpse of the proposed Alpine Park during* *the county's virtual all-wheels community meeting(link is external). It was then that residents learned that this park was not what they expected. The County presented a 26-acre sports complex complete with baseball field, soccer field, basketball courts, pickleball courts, skateboard and bike park, a pad for a volunteer to live and 270 parking spaces.* *When Barnett was asked why the BCLT hadn't purchased Phase III when it was offered for sale to them in 2013, he said that he couldn't secure government funding. There is no record of public outreach to secure private funding for the purchase, or which federal grants he tried to secure.* *Barnett also said that "in early 2019 rumors circulated that the property had been sold," and "about that time the County advised the public that the closing on a large property for an Alpine community park was imminent."* *Barnett has been on the ACPG's Trails and Parks Subcommittee and has worked closely with the County and former Supervisor Jacob for over 15 years. While Barnett has not stated precisely when he learned of this plan, his state top priority has long been to get a "County sports park" and it seems unlikely that Supervisor Jacob would have made a decision to back the project without Barnett's knowledge or approval.* *Once residents were made aware of the expansiveness of the park, many expressed their outrage at the prospect of a sports park*	

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	rather than a passive park that preserves the natural environment. *A group of people united under the name of "Preserve Alpine's Heritage." They met virtually with the County to encourage the County to downsize its proposed sports park into a smaller, nature-based park. They have yet to change their plans.* *At present there are almost 500 members of the Preserve Alpine's Heritage Facebook page. They envision "a small, nature-based park next to Wright's Field Preserve that respects and complements the open spaces and outdoor recreation offered by this irreplaceable natural resource already enjoyed by so many."* *They also feel there should be smaller parks closer to town and to refurbish the existing sports fields that are in disrepair.* *Two BCLT board members, wildlife biologist Rene Owens and research geologist Pat Williams, were supportive of this group.* *As the Preserve Alpine's Heritage grew and became vocal in the community, the BCLT asked for both of these board members to resign. When Pat Williams wouldn't resign, they voted him off the board.* *Travis Lyon(link is external), like Barnett, is pro sports complex and is also on the BCLT and the ACPG. They remain steadfast in their support of a sports park on Wright's Field. Two out of the five BCLT board members are active proponents(link is external) for the development of the sports park.* *However, the BCLT states(link is external) it "has not taken any official position on the proposed Alpine Park." Their website goes on to state "Any public sentiment from BCLT Directors/Personnel are solely their personal positions, not those of the board as a whole." During the January 2021 ACPG virtual meeting, Barnett replied(link is external) to residents concerned about the sports park's impact, "I'm comfortable with that personally… Um, I'm sure it's just not going to just damage the whole rest of the 380 acres."* *Ultimately, the ACPG decided to justifiably wait for the environmental impact report and traffic analysis to vote on*	

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	whether as a group they support an active park on Wright's Field. Meanwhile, public outcry is expanding in the Alpine community. *A letter on behalf of the board of the Greater Alpine Fire Safe Council(link is external) has been published in the Alpine Sun and a petition on Change.Org(link is external) has been posted. In less than a week there have been over 350 signatures of people who have serious questions about the placement of an active park on Wright's Field.* *A website has been developed by Preserve Alpine's Heritage(link is external) to keep the public informed and force the County to be transparent. Supporters of both the Back Country Land Trust and former Supervisor Dianne Jacob find it disappointing that they would barter the grasslands for what appears to be political gain. With Jacob gone due to term limits, any efforts by constituents seeking to have the active park moved elsewhere would need to persuade Jacob's replacement, newly elected Supervisor Joel Anderson.* *If you are against the proposed park as it is presently designed, please make your voice heard. Write letters, make phone calls, sign the petition(link is external) and get involved. Once this land is gone, it is gone forever.* *The opinions in this editorial reflect the views of the author and do not necessarily reflect the views of East County Magazine. To submit an editorial for consideration, contact editor@eastcountymgazine.org(link sends e-mail).*	
I90-5	I am including this information so that it can be on the record that many are aware why and how this park was created, and it wasn't because the taxpayers of San Diego County want to travel to Alpine in 90 + degrees and get heat exhaustion playing pickleball.	This comment is acknowledged. The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No further response is required. No changes to the RS-Draft EIR are needed.
I90-6	Here is the letter from George Barnett where he "believes the BCLT Board majority does support the proposed park. But it wishes to be reassured that the park's impact is identified and can be mitigated."	This letter is acknowledged for the record. No further response is required. No changes to the RS-Draft EIR are needed.

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	Based on my research, it is interesting that those who did not align with the "Board majority" were voted off the BCLT Board. From: biggeorge8888@gmail.com *To: Tjiong-Pietrzak, Judy; Lubich, Marcus; Salomon, Johanna; Bradley, Lorrie; Whitty, Eira; Mosley, Deborah; Benham, Crystal; Williams, Robert* *Cc: "George Barnett"* *Subject: RE: Alpine Park Concept Review- BCLT* *Date: Wednesday, December 30, 2020 11:58:17 AM* *Attachments: draft county response to deir.pdf* *2005-07-22 - county - renee bahl to mark price.pdf* *Hi, Judy.* *Thank you for setting-up this meeting. I have asked BCLT board members to provide a concise list of environmental concerns as to how the Alpine County Park could impact the adjacent Wright's Field Environmental Preserve. Part of this is due diligence on our part as the grant deeds of that property specify several conservation easements/restrictions, and we want to ensure we are complying and protecting the land.* *I assume that most concerns will fall into, or be addressed, by these three cataegories:* *1. County's EIR Findings* *What significant environmental impacts have been determined by the County's project EIR, and how will those impacts be mitigated? We are concerned with being able to maintin the commitments of the MSCP and the Field being a PAMA, BRCA designated.* *In past years, the County has not supported parkland in the targetted area due to belkieving that impacts on Engelmann oaks and native grasslands, as expamples, would be unmitigable.* *For reference, I attach a County letter to the Alpine Community Planning Group dated 2005-07-22 expressing disfavor with the idea of parkland on Wright's Field; and a copy of the County's response to the Grossmont Union High School EIR, which had targeted Wright's Field as a one of four potential high school sites.*	

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	I believe the BCLT Board majority does support the proposed park. But it wishes to be reasurred that the park's impact is identified and can be mitigated. *2. CDFW Findings* *What comments and/or concerns have been expressed by the California Department of Fish & Wildlife, and how will those be addressed?* *3. USFWS Findings* *What comments and/or concerns have been expressed by the U.S. Fish & Wildlife Service, and how will those be addressed?* *And too, we are interested in the Wildlife Agencies current focus on animal species such as butterflies. The reason is that focus has been shifting a bit in recent years and the Quino is showing a stronger presence on Wright's Field, while Hermes Copper has had a historic presense (altough recent surveys hace not found them). The Wildlife Agencies are increasingly concened with Hermes. And perhaps you know, BCLT, the Trust for Public Land and US Navy have been in a contractual partnership for several years regarding conservation in the East County, with focus on the far Backcountry from Potrero in the west through Campo to La Posta in the east. That contract has been recently amended to include the County of San Diego. So we all are contractually together and well aligned as to goals and missions.* *Below are the potential BCLT attendees.* *Thanks again. George* *BCLT Probable Attendees:* *Tim Todaro; President & Director (Tim is a brokerage partner, financial adviser & stock analyst) George Barnett, Vice President & Director of Land Acquisitions (George is a retired chemical engineer)* *Ann Pierce, Secretary & Director (Ann is a publishing business owner & a Backcountry school counselor)* *Scott McMillan, Director - Biological Resources (Scott is a biologist and land restoration manager) Travis Lyon, Director -*	

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	Land Use Planning (Travis is a commercial developer & CEO of a medical billings firm) *Pat Williams, Director - Backcountry Land Management (Pat is a geologist with teaching service at SDSU)* *Rene Owens, Director (Rene is a biologist)* *About BCLT* *Back Country Land Trust currently owns and/or operates 4,600 acres of conserved land from Alpine to Potrero to La Posta. BCLT's annual conservation expense budget is about $350,000. BCLT has a asset base of nearly $15,000,000, mostly as conserved land plus some endowment investment accounts. Since founding in 1991, BCLT and its partners have conserved over 10,000 acres at a value of $40,000,000, including pariticipating in team effort projects such as Robert Ranch in Descanso and the Crest Ecological Preserve. Michael Beck, of EHL/EHC and Planning Commisioner, has been a BCLT director, and BCLT and Mr. Beck remain steadfast conservation partners.*	
I90-7	With that information posted, I would like to reiterate our concerns, as well as some of the information put out on the recent recirculated DEIR. On November 12, 2021, my husband and I wrote a letter regarding the proposed Alpine Park Project. I will attach the letter dated November 12, 2021 for reference, but the summary concerns were: 1. Lack of Noise Berm by Calle de Compadres Cul-De-Sac (No response on recirculated DEIR)	Jeff and Alanna Light's comments on the Draft EIR were addressed in the responses to comments I33-1 through I33-16. Specifically, the commenters' concern about the lack of a noise berm was addressed in the response to comment I33-3. No changes to the RS-Draft EIR are needed.
I90-8	2. Overflow parking/traffic on Calle De compadres (No response on recirculated DEIR)	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would include up to 240 parking spaces, although all spaces are not expected to be occupied during typical operation. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area.

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		It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the RS-Draft EIR are needed.
I90-9	3. Location of dog park/Loose Dogs/Noise from dogs (No response on recirculated DEIR)	Please see response to comment I33-5. No changes to the RS-Draft EIR are needed.
I90-10	4. Special Events Permitted to 10PM/Light Pollution (No response on recirculated DEIR)	Please see response to comment I33-7. No changes to the RS-Draft EIR are needed.
I90-11	5. Calculation of average local highs and effect on the sports facilities and usage - including closure of park when temperatures are high. (No response on recirculated DEIR)	Please see response to comment I33-8. No changes to the RS-Draft EIR are needed.
I90-12	6. Water & the cost to taxpayers for increased water need (Recirculated DEIR)	Please see response to comment I33-9. No changes to the RS-Draft EIR are needed.
I90-13	7. Expansive soil impact on structures and asphalt parking (No response on recirculated DEIR)	Please see response to comment I33-10. No changes to the RS-Draft EIR are needed.
I90-14	8. Circulation/Traffic (Recirculated DEIR stated that would be no significant impact)	Please see response to comment I33-12. No changes to the RS-Draft EIR are needed.
I90-15	9. Fire Danger Lots of information in the Recirculated DEIR but bottom line is when there is a fire, and there will be, the roads must be able to accommodate first responders to get in and residents to get out. Having lived here through other fires, South Grade Road is a bad road to get out of in an emergency, no matter what excuse you make.	Please refer to MR-9 (Wildfire) and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for information regarding how the project would not interfere with emergency response and evacuation plans and would not expose people or structures to significant risks associated with wildfires. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K. No changes to the RS-Draft EIR are needed.
I90-16	Extending a sewer line? 14.13 there is a mention of a sewer line. From various talks and documents, it appeared that there would be a septic line – not a sewer line. If there is a sewer line, where is this being attached from? Are you going to allow other developments to connect to it? If that	Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR and MR-15 (Water and Wastewater) for information on the septic system to serve the facilities and wastewater treatment. Please also see response to comment I88-5. The additional sewage to be treated by SDCSD is within the available capacity; no adverse effects are expected either with regard to the treatment plant or nearby residents. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	was the case, it would be a huge traffic impact for all the residents.	
I90-17	There still seems to be no indication of improving South Grade to accommodate the additional traffic, whether it is because of the park or for the additional, denser housing communities that the County wants. Is your plan to wait for more developments to be built and then blame problems on the roads to them and not the Park? Seems like the Active Sports Complex and more developments have a symbiotic relationship, especially when you are now spouting a sewer line. It wouldn't be the first time back room deals were made.	Please see MR-7 (Transportation and Safety) for additional information. No changes to the RS-Draft EIR are needed.
I90-18	The only plus on the whole RECIRCULATED DEIR is that you added Alternative 5 – Passive Park Alternative to the packet….which would eliminate most everybody's concerns except for the politicians and special interests who obviously have a different agenda than residents in Alpine.	The commenter's preference for Alternative 5 is noted for the record. No changes to the RS-Draft EIR are needed.
I90-19	My husband, neighbors and I would really like some answers to questions. Thank you for reading the information I have shared and hopefully paying some sort of attention to it.	This comment is acknowledged. No changes to the RS-Draft EIR are needed. No further response is necessary.

Comment Letter I91: Lundy, Erick, December 17, 2022

Comment#	Comment Text	Response
I91-1	Extremely unfortunate the park is taking so long to build. This is so typical of trying to get anything done in California. Environmentalists have a stranglehold on ANY land improvement, even this beautiful park that will benefit the residents of Alpine in a major way. Good Luck! One of the main reasons we finally sold our home this year in Alpine and moved out of the state. VERY HAPPY.	The County appreciates the comment submitted on the RS-Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No further response is required. No changes to the RS-Draft EIR are needed.

Comment Letter I92: Mason, James, February 27, 2023

Comment#	Comment Text	Response
I92-1	Thank you for the opportunity to comment on the Alpine County Park Recirculated Draft Environmental Impact Report (DEIR). As a 30-year resident of the rural town of Alpine, I have multiple concerns regarding the proposed park, its scope, need, and development. Let me be clear: I strongly oppose the Alpine County Park as proposed. While I understand that the idea of creating a regional park for recreational activities is appealing, I believe that the current proposal is not the right solution for our rural community.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I92-2	First and foremost, I am concerned by the scope of the park. It has become evident that the population growth of the San Diego backcountry, especially Alpine, has not been as predicted (see SanDag Series 14 and US Census 2020 data). In fact, it is far, far less. As such, a park of this scope has not only not been requested by the local community, but the scope cannot be justified by the population levels.	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. Please see response to comment I80-8. No changes to the RS-Draft EIR are needed.
I92-3	As a result, the proposed regional park will be significantly disproportionate to the needs and size of the community, as well as devastating to the local natural habitat (Wright's Field Multiple Species Conservation Program).	Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. See MR-2 (Indirect Impacts on Wright's Field) for a discussion of indirect impacts on adjacent resources. No changes to the RS-Draft EIR are needed.
I92-4	Based on the above and given the options put forth under the DEIR Chapter 6: Alternatives, the option that best aligns with the park as initially presented and generally supported by the community is the passive park alternative.	Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I92-5	However, I am convinced that a better solution is one not yet proposed by the County: a nature-based, passive park with activities such as trails, amphitheater, workout stations, playground, shaded areas, parking, interpretive center, etc. These activities: 1. Are appropriately aligned with the rural location. 2. Respect the majority of the community input as illustrated by County data.	This comment is acknowledged. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	3. Satisfy a majority of the County Park objectives.	
I92-6	Therefore, it is requested that the County cease current plans, in favor of redesigning the park based on the above and present this to the community for approval. Approval and support I am convinced you would receive. I truly appreciate the opportunity to comment and state my concerns regarding the Alpine County Park DEIR.	This comment is acknowledged. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I93: Meyer, David, January 30, 2023

Comment#	Comment Text	Response
I93-1	have been a resident of Alpine since 2003 and I would like to say that my children missed this opportunity to have a park to enjoy as children however, I am in full support of this project as I am sure it will provide enjoyment for the children and adults alike of this wonderful community as well as providing a safe environment to park vehicles and horse trailers, it really has become a safety issue with the amount of vehicles that park along South Grade Rd.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's support for the project is noted for the record. No changes to the RS-Draft EIR are needed.
I93-2	And than try to navigate their way across the street with children and pets in tow to wrights field , it has become a dangerous situation!!	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.

Comment Letter I94: Murillo, Vince, December 27, 2022

Comment#	Comment Text	Response
I94-1	Please note that this project is not supported by a large number of individuals I have spoken to. I would ask that a vote or poll be conducted, as again, it appears this is not favorable to many Alpine residents. A community park seems to be a more logical choice and agreeable to many I've talked with.	The County appreciates the comment submitted on the RS-Draft EIR. The commenters' opposition to the project is noted for the record. Please see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	We, the residents at my Alpine home, are NOT in favor of a sports complex.	

Comment Letter I95: Murphy, Susie, January 4, 2023

Comment#	Comment Text	Response
I95-1	I am pleased to write this letter to submit my comments on the updated Draft EIR for the plan for the Alpine County Park. I support the original proposed park plan and reject any of the offered alternatives in the DRAFT EIR. I continue to believe that Alpine has been long overdue for a park of this quality that has had extensive input from the community over the past 4 years. I continue to stand in full support of the park amenities as planned and particularly the bike park and all-wheel park amenities which I know will be embraced by the community and riders of all ages. The County of San Diego Department of Parks and Recreation is to be commended for their vision of providing quality parks for the people of San Diego County.	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's support for the project is noted for the record. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I96: Norton, Annie, February 26, 2023

Comment#	Comment Text	Response
I96-1	I appreciate the opportunity to respond with comments regarding the Recirculated Sections of the Alpine Park Environmental Review. While I cannot profess to be either an expert in flora and fauna or legal issues, I am a long-time resident of Alpine who has a vested interest in the community's present and future vision and needs. I wish to express my concerns, observations, opinions and questions regarding this life-changing proposed park in Alpine. I am requesting that the County answer with clarity all of the following questions and comments relating to the project as well as my unanswered questions in my	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's concerns, observations, and opinions of the project are noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter also included copies of two comment letters submitted on the Draft EIR, which the County responded to in the Final EIR and do not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	November 11, 2021 letter to San Diego County Department of Parks and Recreation (DPR). (see Attachment 1).	
I96-2	**Extension of time to respond** It does not go unnoticed the date in which the revision was published for public review; exactly when the holidays became all-encompassing. The last thing a member of the public wants to do is spend precious holiday and family time devoted to reviewing and responding to such detailed documents. I find this of questionable strategy and suspiciously view this as another maneuver DPR has taken to create obstacles for the public to have adequate time to review. The information DPR submitted for public review in December was inadequate due to lack of completed staff work (and discovered by an Alpine resident, not by DPR), causing the need for a time extension. Question: 1) Why was this time extension not awarded the same amount of time frame in order for the public to re-read and re-review all documents that had to be redone by County staff? 2) Why was it not made clear by DPR California Environmental Quality Act (CEQA) email notice that the time extension also included revisions to the documents released in December? At this point in the juncture, rather than being a project in which we all worked together, I unhappily view the situation as being government vs citizens; the government deciding what is best for its citizens without the government honestly listening to the citizens who will be directly affected by the government's actions. I personally believe that government agencies are indebted to working with (not against) its citizens. The DPR's attitude of the public throughout this process has been dismissive, disrespectful and possibly unethical towards the citizens of Alpine. DPR has taken on the oppressive Big Brother image, forcing our community to accept what DPR renders necessary for our community without taking into account our cherished sense of community and legitimate concerns.	A 45-day public review period was provided for public comments as required by the CEQA Guidelines and no extension was required. In addition, the County provided a public notice of the availability of the RS-Draft EIR during the 75-day comment period from December 16, 2022, to February 28, 2023. After the Notice of Availability was issued for the RS-Draft EIR, the County replaced the *Preface*, *Executive Summary*, *Hazards and Hazardous Materials*, *Wildfire*, and *Alternatives* sections to correct minor typographical errors. No new information was presented in these replaced documents. Section 4.4, *Biological Resources*, was replaced, and new information was provided. To account for typographical errors, the County extended the public comment period for the RS-Draft EIR by 14 days for a total review period of 74 days. No changes to the RS-Draft EIR are needed.

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I96-3	I will interject that DPR is not the only guilty party regarding lack of respect and disregard for Alpine community members. Alpine Community Planning Group (ACPG) should be held accountable for its self-interests, self-goals and self-motivations. At least on this issue, ACPG did not acknowledge the overwhelming (and surprising) number of people throughout the community who spoke of their disapproval of the project at numerous ACPG meetings. [Sidebar: Historically, Alpine residents do not participate in large numbers regarding public comments on items that may affect their community; maybe this is why Retired Supervisor Dianne Jacob said years ago that if Alpine doesn't get their act together, we'd never get a park.] The ACPG failed to live up to their sworn responsibility to represent the community's wishes, even if not aligned with their own individual wishes. They failed to pass onto the appropriate agency (this time it is DPR) what the public truly wanted. In fact, active efforts were made between DPR and ACPG to squelch public comments. Portions of the Public Records Act (PRA) will confirm my observations. I surmise that this is a close-to-perfect example of corruption and backdoor politics on a local level and should not be tolerated. Question: Because of these events occurring, should it not give pause to the true validity of this entire process of the proposed park moving forward in any aspect?	Please refer to MR-11(Public Outreach) for more information regarding the public outreach efforts conducted for the project. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I96-4	I have attached my Letters to the Editor of the Alpine Sun which reflect some of my views and observations and point out the behind-the-scenes dealings of ACPG and the DPR that are possibly unethical. (See Attachments 2,3,4)	The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I96-5	**Piecemealing** Elements of the construction and implementation of the proposed park that are red flags and that do not adhere to CEQA requirements include, but are not limited to:	Individual responses that address each of the comments are provided below. No changes to the RS-Draft EIR are needed.
I96-6	1. Piecemealing pathways: DPR is not taking into consideration the ever present lack of public pathways to reach this destination. And the County has NO intention to remedy this serious and very dangerous element within the	Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft

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	park plans. The DEIR only includes a partial pathway along South Grade Road that is adjacent to the property line; rendering this piecemealed pathway-to-no-where and does not connect to any existing safe passageway. Alpine's topography often does not lend itself to providing such vital necessities. Unfortunately, creating such a pathway from the center of the Village is probably not doable. There is an effort by ACPG to incorporate a viable "Alpine Loop" to remedy this circumstance but because the loop is not part of the current Community Plan and has not yet been adopted, DPR cannot proclaim that the pathway problems are solved and, therefore, have no significant impact. This element is a NON-NEGOTIABLE in order for Alternatives 2, 3 and 4 to be feasible without endangering our public.	EIR for a full discussion of the alternatives considered but rejected. No further response is required. No changes to the RS-Draft EIR are needed. As a separate project, DPR is working with DPW on the development of the Alpine Community Loop, which includes construction of pathways and sidewalk improvements to increase connectivity of Alpine Park to the Village center. Funding for the Alpine Community Loop project is requested as part of the County budget for Fiscal Year 2024/25.
I96-7	2. Piecemealing sewer connection: Infrastructure is not presently available. The current locations of the sewage line are either down Tavern Road and ending at Joan McQueen Middle School or from Albertson's which is at the far east end of the Village and at least 1 mile from the proposed park. Note that sewer lines are intended only within the hi-density area of Alpine, the Village. Sewer extensions lend to increased development outside the Village and is not in line with the Community Plan and encourages increased development outside the Village. The DEIR does not address how a sewer line from Joan McQueen will be implemented. Question: 1) Will the sewer line be extended to the park site and if so, via what route? If a sewer line will be utilized, proper evaluation of the impacts should have been included in the DEIR. Is there any chance that a sewage line would be constructed that would transverse Wright's Field in order for connection to the sewage line? I do not need to express how this option should not even be mentioned or considered within the DEIR.	Regarding sewage conveyance, an onsite connection to an existing sewer line is one of two options available for sewage disposal from the project site. See response to comment I88-56 and MR-15 (Water and Wastewater) for more information. The selection of which sewage disposal option is most appropriate for the project will be made as the project proceeds into further detailed development. The final option chosen would be required to meet all County regulations for sewage disposal. No changes to the RS-Draft EIR are needed.
I96-8	3. Piecemealing Access to Wright's Field: In essence, development of Alternatives 2, 3 and 4 will effectively cut off any public access into Wright's Field (without accessing via private roads.) The majority of those who access Wright's Field do so via the County owned property. Once Alternatives	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. See MR-2 (Indirect Impacts on Wright's Field)

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	2, 3 or 4 are implemented, the County will soon discover that many residents just want to reach the solitude of Wright's Field. Question: 1) Why has the county not taken serious considerations of the impacts the proposed park will have for those wishing to avoid the active park and just seek the passive park's access to Wright's Field? 2) Why has DPR chosen to eliminate this only viable method of access to Wright's Field?	for a discussion of indirect impacts on adjacent resources. No changes to the RS-Draft EIR are needed.
I96-9	**Water Usage** Our water resources have been depleting for a number of years and are a serious and acute issue. Alpine pays one of, if not the highest fees to have water pumped to our community in the County. We are constantly being told by the Padre Dam Water District that we must conserve, both inside our homes and in our landscaping. Smart garden landscaping in our area consists of replacing water-hogging lawns (and the chemical residuals that come to keeping a lawn) with drought tolerant plantings. Questions: 1) How can an agency, DPR, condone and recommend a project which will place tremendous and unnecessary stress on our water supply? 2) Why has DPR not addressed this real impact that will affect the entire San Diego County? 3) How can the County justify using County-wide moneys for this misuse of this finite resource?	For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to help reduce overall water demands within the PDMWD service area. Landscape design would include the installation of drought-tolerant native plants to reduce water demands for irrigation. No changes to the RS-Draft EIR are needed.
I96-10	**Estimated Population Increase** The Recirculated DEIR states in the Objective 2 of each Alternative, "...In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine Community Plan Area's (CPA) by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities…." Alternatives 1 and 5 "would not address these concerns or contribute to responsibly furthering the region's growth."	Please see MR-12 (Parks Master Plan) for more information about park needs. No changes to the RS-Draft EIR are needed. Shute, Mihaly, & Weinberger's comments on the Draft EIR were addressed in responses to comments O9-1 through O9-7.

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	In direct contrast, Attachment 5 is the May 18, 2022 letter from the law firm of Shute, Mihaly & Weinberger, speaks directly to the issue of population growth. It explains why there will be no need for a park in Alpine of the proposed grand scale. "The Project is oversized, incompatible with the rural character of Alpine, would substantially increase overall vehicle miles traveled ("VMT"), and would convert open space in an area with substantial biological resources to an active recreational facility."	
I96-11	According to SANDAG's Regional Plan and Sustainable Communities Strategy, goals are to reduce greenhouse emissions and meet climate change standards between 2023 and 2035 (12 years). In addition, SANDAG's July 2020 Regional House Needs Allocation Plan (RHNA) has drastically reduced the number of allocated housing units in the total unincorporated rural areas. There can only be a TOTAL of the ENTIRE unincorporated areas of San Diego County of 7,000 units between 2023 and 2035. The letter further concludes, " …in order to be consistent with SANDAG's 2021 Regional Plan and Series 14 forecast and RHNA, the County will have to reduce Alpine's housing allocation from the current General Plan, which will result in significantly less population growth in the Alpine area. Based on the foregoing, there [is] no reasonable argument supporting the need for a park project of the proposed size."	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. No changes to the RS-Draft EIR are needed.
I96-12	Questions: 1) Why does the County continue to use outdated statistics relating to anticipated growth in Alpine and the rest of the unincorporated rural areas? 2) Why does the Recirculated DEIR not address the proper current calculations made in the May 22, 2022 letter from this law firm? 3) Is it not true that the County information submitted for public review is in essence not true facts relating to population growth? 4) Does DPR not need to comply with the current SANDAG's Regional Plan and Sustainable Communities Strategy, the Series 14 forecast and the RHNA? 4) Is this gross neglect of the	Please see response to comment I80-8 for why the Draft EIR utilized SANDAG Series 13. The PMP found the Alpine CPA to have a deficit of local parkland. See MR-12 (Parks Master Plan) for more details related to the need for park facilities. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	County's responsibility to use up-to-date standards and compliances?	
I96-13	**Determining the amount of park acreage needed in Alpine** If compared with SANDAG's analysis, it appears that the County is continuing to use outdated methods to calculate the number of needed park acreage in Alpine. In addition, DPR seems to be neglecting to include existing passive park acreage into its calculation to determine the number of acreage already present in Alpine. If the County would include the number of acreage already present in Alpine that includes both passive parks/preserves with active parks, the County may be quite surprised at the park-to-population. Do the math. Even though the current parkland acreage is not necessarily owned by the County, Alpine still, nevertheless, has parkland that must be included to accurately calculate the park acreage. The County does provide partnership-funding for park elements in Alpine (example: $900,000 to redo the playing fields at Joan McQueen Middle School.) It appears that the County does not consider passive parks to be of equal importance to active parks to meet the park acreage-to-population ratio. From the way DPR has handled and has responded to the public, it is quite apparent they do not value passive parks; that passive parks serve only as a purpose of just meeting mitigation requirements. The County can then justify their intention to destroy sensitive habitat in the name of "Community Needs" of a gathering and connecting place. DPR should be aware that we already have a community center for the community to connect. It must be emphasized that Alpiners gather and connect in their own unique ways--not fitting into one of the County's prescribed, canned objectives.	Please see response to I96-12, above. No changes to the RS-Draft EIR are needed.
I96-14	One of DPR's goals is to have exceptional (by their standards) park and recreational opportunities. As the public has stated throughout this process, Alpine would embrace such goals IF these opportunities were located in *appropriate* location(s).	Chapter 6, *Alternatives*, of the RS-Draft EIR included an Alternate Location Alternative that was considered but rejected. This alternative was deemed infeasible because the County does not own other properties in Alpine, which prohibits the

Comment#	Comment Text	Response
	DPR should have surmised from their studies and community input that in order to actually meet Alpine's unique needs, the multi-matrix approach should be taken using mini-parks. Mini-parks would address all the needed amenities and can then be located in the high density area--the Village--where the needs for these amenities are most needed and most appropriate.	implementation of parkland in the community within a reasonable amount of time. No changes to the RS-Draft EIR are needed.
I96-15	It should be made perfectly clear to the County that Alpine's heritage does not view active parks as more valuable than passive ones…Wright's Field is our town's stand-out gem which gives our town its own identity and an unsurpassing uniqueness. During Covid, it was where the community sought peace and tranquility walking the trails and reconnecting with the healthy values that only nature can provide. Incorporating Alternative 5 in its entirety (and with minor enhancements/inclusions) would be the ultimate enhancement to our town and our town's pride and would be the closest to keeping Alpine's unique and coveted rural character and heritage.	The commenter's preference for the Passive Park Alternative is noted for the record. No changes to the RS-Draft EIR are needed.
I96-16	**Level of Service (LOS)** I reference two articles regarding Level-of-Service (LOS) metrics (see Attachments 6, 7) 1) American Planning Association's *Pas Memo "Alternatives for Determining Parks and Recreation Level of Service",* May/June 2016 2) National Recreation and Park Association (NRPA) Parks & Recreation Monthly Magazine, *A New Approach to Parks and Recreation System Planning'"* October 29, 2020 Both were authored by David Barth, Ph.D., CPRP, AICP. Dr. Barth has developed parks and recreation system master plans for over 70 US communities, one of which is downtown San Diego. Therefore, Dr. Barth's expertise in the field should not be a stranger to DPR. Both discuss the departure of using the antiquated 27-year-old (1996) guidelines to the new approach to Parks and Recreation System Planning.	The comment references two articles on LOS metrics and does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	The documents stress that "there are no longer any nationally accepted standards for parks and recreation planning." This includes the matrix used by DPR to determine the number of acreage-to-population figures.	
I96-17	This new approach responds to societal shifts and expectations. It indicates that park facilities should no longer be "isolated" but rather essential frameworks for achieving community sustainability, resiliency and livability. They further state that there should be "an ongoing, collaborative planning process [that] can lead to the development of an integrated public realm that can generate far more benefits for a community than the traditional" "linear, narrowly defined parks and recreation system plan"… In addition, "Careful and thoughtful planning is critical to identifying opportunities to generate greater resiliency and sustainability benefits for the community, as well as building the credibility and support needed to implement key recommendations. The eventual success or failure of many plans can be traced to the amount of time spent initiating and planning the process. Once a PRSMP process begins, it is very difficult to change its scope, budget and deliverables midstream."	Please see MR-12 (Parks Master Plan) for information on park needs in the Alpine community. The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-18	"...access is an important measure of service….[and]...there are no standard criteria for access LOS. Each community must determine its own based on land development patterns…"	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-19	Questions and Comments: 1) Can you state whether DPR incorporated any of this new approach into Alpine's park planning? If so, provide details.	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts. No changes to the RS-Draft EIR are needed.
I96-20	2) Can you tell me why DPR failed to obtain robust and honest community input?	Please see the response to comment I96-19, above. No changes to the RS-Draft EIR are needed.
I96-21	3) Can you explain why DPR slyly told the public we would be getting a small, undisruptive park but, in reality, the plan turned into a massive Sports Complex only for Alpiners to be blindsided and learn of this Alternative at the VERY END of the planning process?	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-12 (Parks Master Plan) for information on park needs in the Alpine community. No changes to the RS-Draft EIR are needed.

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I96-22	DPR will probably justify their actions by stating that they initially hold public meetings (that were very poorly attended by locals). Had DPR's intentions and goals been transparent at the onslaught and during the public meetings, we would not have relied on the misinformation given to us (i.e., a 10-20 acre portion of the property would be used for active purposes keeping in alignment with the community rural standards). I contend that the County and ACPG knew from the very onslaught of their goal to gain Prop 68 grant funding for a Region Sports Complex (of which funding was not awarded)yet did not have the "cajones" to be honest with the public. In effect Alpiners were lied to and deceived by DPR and ACPG.	Please see the response to I96-21, above. No changes to the RS-Draft EIR are needed.
I96-23	**Biology** "Because we all share this planet earth, we have to learn to live in harmony and peace with each other and with nature. This is not a dream, but a necessity." --His Holiness the Dalai Lama Question and Comments: How does the above quote square with the project's biologist's statement in one of the public meetings, "You are getting this project whether you like it or not?" This kind of condescending statement does not lend itself to establishing any public trust. 1) Does this then mean by "hook or crook" this project will be built?	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. No changes to the RS-Draft EIR are needed.
I96-24	2) How can the public then trust any statement or study done by the DPR as being honestly completed at expected standards?	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. No changes to the RS-Draft EIR are needed.
I96-25	The revision includes real or potential impacts to the following. Depending on the Alternatives, the level of impact of each varies except for Alternatives 1 & 5 (where there will be no impacts.) As stated by the Recirculated DEIR the following are the seven areas of impact: 1) Impacts of Wright's Field 2) Impacts of Wildlife Corridors 3) Impacts on native grassland	This comment reiterates information presented in the RS-Draft EIR. Further specific references in the comment are needed before a targeted response can be provided. Please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for a discussion about the impacts of the project on biological resources. Section 4.4 also describes how implementation of mitigation measures will reduce these impacts to a level considered less than significant. No changes to the RS-Draft EIR are needed.

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	4) Decumbent goldenbush 5) Palmer's grappling hook 6) Valley Needlegrass Grassland 7) Engelmann Oak	
I96-26	The Recirculated DEIR identifies a much-expanded list of biological impacts to specific species that were not included in the initial DEIR. This new revision shows a remarkable indication of DPR's shoddy, incomplete assessment in its initial DEIR. And we are supposed to blindly agree with DPR conclusions? The highly lacking studies continue to reconfirm that the public cannot place trust in this agency to fulfill its duty to the public as the lead agency.	Indirect and direct impacts on biological resources were refined and expanded upon in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-27	As stated before, I am not an expert in fauna or flora. It does not take a rocket scientist, (of which I also am not!) to see the convoluted approach to conservation by using mitigation (that have no guarantees of success) to redefine the existing property to suit the whims of man's immediate gratifications. It totally ignores the purpose of this land using Multiple Species Conservation Program (MSCP) guidelines. It is reckless for us to project that the trendy pickleball courts and skate and bike skill parks are more important than saving, protecting and enhancing Nature's gifts to us that are presently within the Project. It is additionally absurd to include more baseball fields, especially since the County and our school district just utilized an awarded $900,000 improvements to current sports fields. To demand more, at the cost of what we stand to lose including our precious and failing water resources, is an utterly selfish, greedy, short-sighted and improper use of sensitive habitats. People, we have only a finite number of natural habitat acres left in our County and this property harbors a vast variety of creatures and plants that need our protection, not our destruction. This land needs for us to be its stewards to preserve in perpetuity. The diversities of wildlife and flora are extensive. When it is gone, it is gone forever.	This comment expressing opposition to the project is noted for the record. Areas within the Alpine Park Preserve, which is a proposed part of the project, are anticipated to persist in perpetuity through management activities and permanent protection mechanisms inherent in the MSCP preserve assembly. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. See MR-4, Natural Resource Mitigation, for additional information. No changes to the RS-Draft EIR are needed.

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I96-28	**Executive Summary** The following is my review of the Recirculated DEIR's Executive Summary. I have specific questions regarding portions of the Executive Summary. I request answers to these questions which may help me understand DPR's motives and goals as they pertain to the project. I request that my questions be seriously considered and respectfully responded to.	This comment is acknowledged. Individual responses that address each of the comments are provided below. No changes to the RS-Draft EIR are needed.
I96-29	**Overview**: "...The County DPR proposes conserving the remainder of the property as open space/preserve land…." Questions: Who/what entity will be responsible for maintaining the remainder of the property? Is the County considering sharing or handing over the responsibility to an entity other than DPR? If so, have negotiations begun to ensure success?	As required under the County's MSCP Subarea Plan, the Alpine Park Preserve will be managed in perpetuity pursuant to an RMP. The RMP will be developed prior to formalizing trails and before opening the open space to the public. This plan will outline management and patrol activities to be carried out by the County. Activities included in the RMP would enhance and preserve the sensitive natural communities, such as long-term monitoring of onsite preservation areas, as well as nonnative and invasive species vegetation management. Habitat restoration within the open space is also a part of the project. Through these strategic measures, the sensitive natural communities would be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional information. No changes to the RS-Draft EIR are needed.
I96-30	"...For the utilities, the project proposes connecting to the existing sewer system or including a septic system…" Question: With regards to the septic system, has the County performed necessary studies and soil testing to ensure that the area for the septic lines will indeed percolate? This property has been plagued in the past and one reason it could not be developed was that the ground does not percolate and, because the property is presently outside the Village (where sewer hookups are only allowed), sewer hookups violate the Alpine Community Plan. This regulation was established to discourage wide-spread, uncontrolled housing and density developments and to maintain the rural character that is so	Please see MR-14 (Geology and Soils). The Geotechnical Evaluation includes infiltration tests. The EIR plan is not inconsistent with the elements of the Alpine Community Plan (Noise, Conservation, Open Space). See MR-13 (Noise and Lighting) for more information on noise impacts. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Adequate facilities and capacities are deemed to be available with regard to water, wastewater treatment, stormwater drainage, and other utilities needed for operation of the project. Please see Draft EIR Sections 4.6, *Energy*, 4.10, *Hydrology and Water Quality*, 4.15, *Public Services*, and 4.19, *Utilities and Service Systems*, for further information on

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	valuable to its residents. I then must ask: 1) How do you square the violation of the community plan? 2) Has the County secured at least an estimation of the costs to connect to the existing sewer? 3) Why has the County not addressed in the DEIR the impacts it will have during the construction of connecting the sewer system including, but not limited to, noise, traffic congestion, and interference with the existing storm drainage systems? 4) Does the County realize that by connection with the existing sewer lines, the project becomes a piecemeal project as impacts have not been properly evaluated?	these topics. As stated in the Draft EIR, an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the project site. See response to comment I88-5 for more information. The selection of which sewage disposal option is most appropriate for the project will be made as the project proceeds into further detailed development. No changes to the RS-Draft EIR are needed.
I96-31	"..."No Parking" signs would be installed along the shoulder of South Grade Road, as deemed necessary by the Department of Public Works (DPW), Traffic Division, to prevent potential overflow parking on South Grade Road." **Questions:** 1) Has DPW done an adequate study to deem what is necessary? 2) Will the "No Parking" signage be placed on both sides of South Grade Road? 3) Which side is planned for the signage? 4) What is in place and planned for mitigating the potential overflow parking or parking of those not willing to pay the likely parking fee? **Comments**: The DEIR does not address the likelihood and potential overflow of parking on side streets. This is gross oversight for it will directly impact the adjacent neighborhood's streets. **Question:** 5) Will the County provide Parking Permits for the residents on the streets to be affected? These streets would include but not limited to Calle de Compadres, Via Viejas, Nido Aguila with a spillover to Avenida Canora and the streets to the north of the park. It appears that there will be no "No Parking" signage along the west side of South Grade Road because the DEIR indicates there will be a walking path that will take up the space instead	The parking lot will include 240 parking spaces that are intended to accommodate visitors to both the proposed active use park and the trail system, and it is unlikely that all of the visitors would be using the trails and not the park on any given day. At full build-out of the park, the facility will accommodate up to 240 cars. There may be potential for overflow parking in the equestrian staging area, which will be determined by park operations staff. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the Draft EIR are needed. Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. No changes to the RS-Draft EIR are needed.
I96-32	"...The project includes maintenance for approximately 1 mile of existing trails; it would close approximately 3,300 linear feet of existing informal-use trails. These existing trails are located north and west of the active park area."	The commenter is referencing an existing informal trail on the County parcel that is within the development footprint of the active park. CEQA requires analysis and disclosure of impacts on sensitive environmental resources; an unofficial, informal trail that users

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	Questions: 1) Why has the DEIR not included or addressed the trail artery leading within the proposed active park area that will also be closed? This trailhead begins almost directly opposite the entrance to Palo Verde Ranch/Via Viejas and traverses what would be in the proposed active park section. It eventually meets up with other trails. This trailhead is presently being used on a frequent basis and should not be overlooked in the discussion of permanent impacts. **Comment:** Therefore, the document is not accurately depicting what already exists. [Sidebar: DPR was told during one of the virtual community meetings by George Barnett (a former member of ACPG and current of BCLT Board Member) that there were no more trails that exist except for the ones on the DPR maps. Mr. Barnett's statement is wrong and misleading. The public was not allowed to correct his misinformation during the meeting.]	have created through undeveloped habitat is not a sensitive environmental resource. Because the comment does not identify specific environmental impacts, no changes to the RS-Draft EIR are needed.
I96-33	"...The remaining 70 acres for open space/preserve would allow for restoration/habitat enhancement." Questions: 1) Who will be responsible to oversee these 70 acres? 2) In the past the County and BCLT have worked together to provide such goals. Should the public expect that BCLT will be the joint shareholder in preserving the acreage?	The County has acted in good faith in working with BCLT to design its trails specifically to reduce impacts on Wright's Field Preserve. As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. The RMP will be developed prior to formalizing trails and before opening the open space to the public. See MR-4, Natural Resource Mitigation, for additional details. No changes to the RS-Draft EIR are needed.
I96-34	**Project Location** "The project site is….approximately 1 mile south of the center of the unincorporated community of Alpine and approximately 1 mile south of Interstate (I-)8….." Question: How did DPR derive this calculation? Comments: 1) DPR's calculation of 1 mile cannot be supported unless, perhaps, if you travel "as the crow flies". Bottom line: it is	This comment includes an inquiry about the method used to calculate the distance from the project site to the unincorporated community of Alpine. The referenced distance of approximately 1 mile is derived from a birds-eye view, and is not associated with travel routes. The selected location for the project is the result of investigations of alternative sites conducted by County DPR, based on considerations of site availability and suitability as related to the project objectives. Please see MR-7 (Transportation and Safety) for

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	more than 1 mile to the proposed park entrance off South Grade Road in both directions. Fitting into the as-the-crow-flies category, there are two other roads off Alpine Boulevard that have access to Wrights Field (and then, presumably, onto the proposed site) that start out County-owned but end as private roads. Those roads are Olivewood Lane and Marshall Road. To access the proposed park via these two roads would be trespassing onto private property and which for obvious reasons should not be promoted. Therefore, they should not even be included or considered as access points. In addition, there is a private road/lane off Tavern Road bordering Joan McQueen Middle School where one might be able to access Wright's Field and then onto the proposed park trails. Again, is it a private road with signage stating it is a private road and no parking is allowed for Wright's Field visitors? There are no parking spots at Joan McQueen to accommodate Wright's Field visitors. So that location cannot be considered.	additional information on project access and roadway operation and safety. The 240 parking spaces are intended to accommodate visitors to both the proposed active use park and the trail system within the Alpine Park Preserve portion of the project, and it is unlikely that all of the visitors would be using the trails and not the park on any given day. Usage of trails is driven much more by changing conditions in the larger community, including population growth and availability of other open space areas, and even by public health hazards such as during the Coronavirus pandemic when increased park usage was observed throughout the County. Furthermore, Wright's Field has its own formal and informal entrances that are not within the County's property, indicating that usage on Wright's Field is not wholly dependent on what occurs on the County's parcel. The County has acted in good faith in working with BCLT to design its trails specifically to reduce impacts on Wright's Field Preserve. No changes to the RS-Draft EIR are needed.
I96-35	2) Please refer to Attachment 8, a Google Map that clearly shows that to reach the project proposed entrance is 2.8 miles from the Tavern Road exit off Hwy I-8 (the route most regional visitors will use and the route most convenient to reach the center of the community.) 3) Since the DEIR does not give its exact location of "the center of the unincorporated community…" a reasonably accurate location should be the "Y" intersection where Alpine Boulevard and Arnold Way intersect in the middle of the Village, where Alpine Womans Club is located. Attachments 9 and 10 are Google Map calculations that show that the distance from Alpine Womans Club (the center of town) to the entrance of the proposed project is either 2.8 miles (via Tavern Road) or 2.5 miles (via South Grade Road).	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. The park is intended to be developed as a community park. No changes to the RS-Draft EIR are needed.

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I96-36	4) One might ask, why such a trite question? Stating that the project site entrance is only 1 mile from the town center clearly misleads anyone that reads this report. It implies that it is within very easy reach for the public living within the higher density section of the Alpine community.	Please see the response to comment I96-34, above. See MR-12 (Parks Master Plan) for further discussion related to the park needs location. No changes to the RS-Draft EIR are needed.
I96-37	Most of the active components to the park are directed to serve the needs of the public, many of whom live in the Village. However, the public does not live within a reasonable range of accessing the site. There are no sidewalks or pathways from the center of town to the proposed parks entrance nor does the project incorporate these needed pathways. There are no forms of public transportation (i.e., buses) for the public to reach the park.	Please see the response to comment I96-34, above. No changes to the RS-Draft EIR are needed.
I96-38	From the onset of designing this park the park's components speak to the needs of the high density areas of Alpine, the Village, where access can be readily accommodated and optimally utilized, causing prudent use of funds and meeting project goals. (Think mini-parks or pocket parks.) In addition, it is misleading to imply that this park is an "easy-access" from the highway. The report also neglects to state that the access is on 2-lane rural roads meant for rural use and not meant to accommodate additional use that the project would bring. 6) So, again, where does DPR come up with 1 mile? 7) Why is such a seemingly minute calculation so misrepresented? It misleads the reader that this park site is close to and offers easy access to both local and regional citizens.	Please see the response to comment I96-34, above. No changes to the RS-Draft EIR are needed.
I96-39	**Project Objectives (that include the underlying purpose of the project)** "Create a place where all Alpine residents can gather and connect as a community." Questions: 1) We have an Alpine Community Center located in the heart of our Village that meets this objective. The project would be duplicative and,	The selected location for the project is the result of investigations of alternative sites conducted by County DPR, based on considerations of site availability and suitability as related to the project objectives. See MR-12 (Parks Master Plan) for further discussion related to the park needs location. For additional information and an analysis of a range of reasonable alternatives, please refer to

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	therefore, is an unnecessary goal and a misuse of County-wide public funds. Comments: 1) Alternative 5, with some adjustments and additions, can and will continue to be a loosely- conceived gathering place for the community. Combined with Wright's Field, the trails on the project saved the physical and mental health of a large portion of the community during the Covid lockdown. 2) Alpine's sense of community is very diverse, adding to the community's uniqueness. There is rarely an occasion that "gathers" and "connects" the majority of our diversities. Two that come to mind are the Christmas Parade of Lights and a parade held around or on July 4th. Our interests are unique and individual and, at best, could be considered subsets within a community.	Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.
I96-40	"Anticipate, accommodate, and manage a variety of active and passive recreational uses, as well as an open space preserve, that benefit all members of the Alpine community, both now and in the future." Comments: Without question, the project should benefit all members of the Alpine community but needs to be located elsewhere and the activities should reflect what the community wants as a whole. DPR should have had the foresight to realize that placing an active park with all the proposed activities on the proposed site is NOT in the interest of all Alpine members because 1) it is not conveniently located to the high density population or provides safe passageways to reach such a destination. Instead, the location is surrounded by residences with a minimum of 2-acres--making it an out-of-place facility. Cool ideas and goals. Wrong location for active recreational uses.	See the response to comment I96-39, above. No changes to the RS-Draft EIR are needed.
I96-41	"Provide for long-term natural and cultural resource management consistent with the goals and objectives of the Multiple Species Conservation Program (MSCP) for the preserve portion of the property." Comments: This should be achieved with the entire acreage. Again, the County is ignoring Alpine's vision of remaining a rural community who appreciates its natural setting.	See the response to comment I96-39, above. The project would be implementing a park and open space on the current County land. The open space area will include an RMP. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these initiatives, the County will

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		demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional details. No changes to the RS-Draft EIR are needed.
I96-42	"Design a community park that integrates and, where feasible, preserves natural features into the park design." Comments: 1) I take great issue with the two words, "where feasible". Excuse me, but current plans totally obliterate, and NOT preserve an established natural environment. To totally destroy a natural habitat and its natural features and then "reconstruct" it, like reshaping a clay sculpture and then to add, "where --it --is --feasible", preserve natural elements" is an absurd use of land. Something is wrong with this picture, including stripping Alpine of its precious heritage and coveted rural atmosphere.	CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Chapter 6, *Alternatives*, of the Draft EIR provides a reasonable range of alternatives to the project. See MR-10 (Passive Park Alternative) for additional information about the Passive Park Alternative that was analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR. Additionally, the Draft EIR describes two alternatives that were considered but rejected including the Alternate Location Alternative. The reason the Alternate Location Alternative was determined to be not feasible is because the County does not own other properties in Alpine, which prohibits the implementation of parkland in the community within a reasonable amount of time. Please also see MR-12 (Parks Master Plan) for additional details. The project would be implementing a park and open space on the current County land. As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional information. No changes to the RS-Draft EIR are needed.
I96-43	"Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and	See the response to comment I96-39, above. For additional information and an analysis of a range of reasonable alternatives,

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	wellness while preserving significant natural and cultural resources." Questions and Comments: This project is a discussion of what is more important: the preservation of significant natural and cultural resources versus the County's vision of what is needed in Alpine to improve health and wellness. If truly concerned about the community's health and wellness, 1) why is the County taking away something that already provides health and wellness (amazing what Mother Nature provides) and redundantly replace it with artificial recreational elements? Again, these artificial recreational elements belong within the Village and, because there is no parcel large enough within the Village that can provide a one-stop-shop-park, mini parks would recapture all these recreational features.	please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. The project would be implementing a park and open space on the current County land. As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Mitigation, for additional information. No changes to the RS-Draft EIR are needed.
I96-44	"Protect public health and safety by incorporating Crime Prevention through Environmental Design and other safety measures into the park design." Comments: Let's not lose sight that by creating this active park, the County is, in fact, creating more opportunities for increasing the crime level which the community is not presently experiencing. No one in Alpine can condone this consequence especially in a location that is residential and presently sees very little crime. The deterrence of fencing, lighting and a volunteer pad do not fit in with or enhance our rural atmosphere and character. Question: 1) How can the County justify this when all efforts for increased crime should be eliminated?	County DPR engaged the County Sheriff's Crime Prevention Through Environmental Design team, who reviewed and shared comments on the draft design concept plan for the park. Its feedback and recommendations were incorporated into the final design concept plan. No changes to the RS-Draft EIR are needed.
I96-45	"Manage Alpine County Park consistent with County DPR's missions, policies, and directives, along with applicable laws and regulations." DPR Mission Statement and Vision The DPR's Mission includes: "We enhance the quality of life in San Diego County by providing exceptional parks and	DPR maintains an award-winning 156-facility park system and has–since the recirculation of the EIR—won several awards for inclusivity, equity, and outreach for its Experience the Outdoors Program. Since July 2022, more than 14,000 people have benefited from free Experience the Outdoors events, which remove financial barriers to park programs, expand awareness of free programs, and diversify offerings to cater to the recreational needs of all San

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	recreation experiences and preserving regionally significant natural and cultural resources." DPR's Vision: "A park and recreation system that is the pride of San Diego County. To provide healthy, sustainable and enriching environments for all. To become a national model for park and recreation organizations…to connect all to the County's diverse world class park system…and should reflect the diversity of the population which this park serves…" **Comments:** By not applying the new approaches to parks and recreation as described in Dr. Barth's articles, DPR certainly cannot profess to create "a world class park system" and, therefore, is not meeting its Mission Statement of providing exceptional parks and recreation experiences. One would think that DPR could use this opportunity in designing Alpine's unique park needs as a ground-breaking model that could, in turn, become world class. **Question:** 1) Why is DPR not living up to its Mission Statement?	Diegans to improve their quality of life. Alpine residents are welcome to attend any of these 70+ program events held, annually. A park has not yet been built for the Alpine community, so recreation services have not yet been provided directly at that site; however, two wilderness-related educational story times were held by County DPR staff at the Alpine Library on August 17 and 25, 2023. The design for the park offers a conservative array of activities to appeal to residents of all ages, interests, and abilities so everyone has access to public recreational experiences. It is County DPR's goal and duty to seek and provide these public spaces for all to enjoy and to curate opportunities for connection once the park has been built. Regarding preserving significant natural resources, the project includes open space of approximately 70 acres and an RMP will be prepared consistent to the County's MSCP. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. See MR-4, Natural Resource Mitigation, for additional information. No changes to the Draft EIR are needed.
I96-46	"Reflect Alpine Community's heritage through the inclusion of architectural elements that reflect the rural nature of Alpine." Questions and Comments: How can one come to any conclusion that the County seriously has a vested interest in preserving Alpine's heritage? Except for Alternatives 1 & 5, the project will 1) totally destroy, reconfigure and immeasurably impact and substantially degrade the existing rural views. 2) Berms will totally block views of the openness one feels as they presently drive past this parcel and will totally block the neighbors' views. 3) Fencing is a visual block--and is not an architectural element of the rural nature of Alpine 3) I am trying to visualize how any of the proposed buildings will reflect architectural elements of a "rural nature." I ask that DPR provide a better understanding of the architectural design of such buildings and the specifics in how they consider these buildings to be improvements and architectural	Please refer to Section 4.1, *Aesthetics and Visual Resources*, of the Draft EIR, which describes the visual setting of the project and evaluates the potential impacts from the project on scenic vistas, scenic resources, visual character, and light and glare. It also identifies the existing designated visual resources, including designated scenic views and scenic highways, if applicable, that are visible from within the project site, as well as existing sources of light and glare in the project site and the vicinity. Figures 4.1-2 through 4.1-6 represent visual simulations developed to represent the visual impacts of the project. The Draft EIR states Impact-AES-1 and Impact-AES-2 would substantially degrade rural views from public viewpoints during construction and operation. These impacts would be less than significant with the mitigation measures from the Draft EIR as listed below.

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	elements to our community? 4) How is placing a volunteer's RV pad on the premises in any way considered an architectural element that reflects the rural nature of our community? 5) How is having lighting at the RV volunteer pad in compliance with our Dark Sky goals? 6) Carrying this further, how is the project in its entirety in any way a part of maintaining a rural atmosphere with all its drawbacks?	**MM-AES-1: Install Screening Fences Along the Active Park Boundary.** County DPR or its contractors shall install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing shall extend around the 25-acre active park boundary. The construction fencing shall be installed in phases so as to block views of construction equipment, materials, and ongoing construction activities, but would not block existing views that are available on the site. In this way the construction fencing would not block the entire 25-acre site at any given time. The construction fencing shall remain as long as construction activities are occurring on the project site. **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries.** All boundaries of the proposed park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the project. Drought tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, and on the western boundary along Wright's Field Preserve, and on the northern boundary. Please see MR-13 (Noise and Lighting) for more information on lighting impacts. This is a comment on Section 4.1, *Aesthetics and Visual Resources*, which was not recirculated as part of the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-47	**Areas of Known Controversy/Issues Raised by Agencies and the Public** The public has been directed to ONLY respond to the sections within the Recirculate DEIR. However, I am not satisfied that the County responded with accuracies to the other remaining concerns submitted. Personally, I have questions I asked in my November letter to DPR that have not all been answered. Examples are what kind of fencing is to be expected and its height? Another is the odor and noise that will permeate from the dog park and the overall danger of dog parks. Question: 1) Does this mean that these unanswered questions are not important and not worthy of a response?	The County responded to all comments received on the Draft EIR in Chapter 2 of the Final EIR. Additionally, per **MM-AES-1: Install Screening Fences Along the Active Park Boundary**, County DPR or its contractors would install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing would extend around the 25-acre active park boundary. The construction fencing would be installed in phases so as to block views of construction equipment, materials, and ongoing construction activities, but would not block existing views that are available on the site. In this way the construction fencing would not block the entire 25-acre site at any given time. The construction fencing would remain as long as construction activities are occurring on the project site.

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		The proposed dog park fencing would be a 6-foot-high chain link with a black vinyl coating. The large dog area is meant to accommodate dogs over 20 pounds. The final size and recommended occupancy for each area will be determined prior to construction. See MR-13 (Noise and Lighting) for more information on noise impacts for the project. No changes to the RS-Draft EIR are needed.
I96-48	**Issues to Be Resolved** "...the CEQA Guidelines requires the summary of an EIR to include areas of controversy that are known to the Lead Agency, including issues raised by agencies and the public." Comments: Although 33 comment letters were received during the NOP public review period, it is grossly misleading to imply that only 33 community individuals showed enough concern for the proposed project. By not including a comprehensive summary of all the public meetings and letters from the public, the County is intentionally and dishonestly skewing and minimizing results to imply that only a few Alpine residents do not want this park. The advantage lies with the powers and influences of DPR vs grassroots efforts vs citizens who give up on the "process", feeling their opinions do not matter because it is futile to try to confront massive Big Brother (DPR) who I might add, is funded in part by taxpayer dollars. Please refer to the information between DPR and ACPG made public via PRA to confirm the efforts to suppress the public's input.	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. No changes to the RS-Draft EIR are needed.
I96-49	**Summary of Project Impacts** Alternative 1--No Project Alternative The site would remain undeveloped with no active park features. The statement, "The creation of a Habitat Conservation Plan for the remaining 71.6 acres would also not occur under this alternative" seems confusing and misleading.	This comment is acknowledged. This comment does not raise specific issues related to the analysis of the RS-Draft EIR. Alternative 1 includes the No Project Alternative, which does not include construction of the project or include the open space, and the HCP. No changes to the RS-Draft EIR are needed.

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I96-50	Questions and Comments: 1) Should not ALL, or most of the 96.6 acres be placed within a Habitat Conservation Plan and not just be deserted?	The project would be implementing a park and open space on the current County land adjacent to Wright's Field to provide contiguous open space land. The active park is not part of the open space, as the HCP would cover the open space acreage. No further response can be provided. No changes to the RS-Draft EIR are needed.
I96-51	2) Who would be responsible for maintenance of this preserve?	As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. This plan will outline management activities to be carried out by the County. The RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space. The RMP will describe the targeted nonnatives, success criteria, maintenance schedule and methods, and annual reporting requirements. See MR-4, Natural Resource Mitigation, for additional details. A full-time park ranger, a live-on volunteer, and maintenance staff are required for the project. The presence of a park ranger and live-on volunteer is expected to reduce the risk of unauthorized activities within the trail system compared to current conditions where the park is periodically monitored by a park ranger. A live-on volunteer would monitor the open space and trails in addition to helping with maintenance and management of the property in coordination with park rangers, allowing for responsive action to problems that may be detected (Section 4.4, *Biological Resources*). No changes to the RS-Draft EIR are needed.
I96-52	3) Couldn't signage be placed in appropriate areas to educate the public the importance of remaining on the trails, to minimize disturbance of the wildlife, especially during mating/nesting seasons, identification of the varying flora and fauna species that reside or potentially reside in the acreage, and the value of why this land was preserved rather than developed?	As part of operations of the project, signs would be clearly posted containing park rules and regulations that would be enforced at the park. Additional signage may be provided to educate the public further. No changes to the RS-Draft EIR are needed.

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I96-53	4) There is an importance to preserve the Alpine's rural heritage and character that this land reflects.	This comment is acknowledged. This comment does not raise specific issues related to the analysis of the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-54	**Alternative 2--Sports Complex Alternative** Can the public assume that because the County was not able to obtain Prop 68 Regional Park grant funds that this Alternative is off the table? If this Alternative is still on the table for consideration, this DEIR does not properly address all the impacts and mitigations required to meet CEQA requirements. I would insist that an entirely new EIR be developed to address such a radical concept and to allow the public a right to address their concerns. Throughout the public input timeframe and at virtual meetings with DPR, the public has been told this park would be a community park yet this Sports Complex Alternative was included in the DEIR. DPR has lied and misled the public throughout the entire process.	This comment is acknowledged. Although the County would not implement the use of Proposition 68 funds, County General Funds and alternative funding sources would be available to the project. Alternative 2 would result in substantially greater impacts related to aesthetics and visual resources. However, Alternative 2 would meet all of the project objectives because it would create a community gathering place, enhancing the quality and life and public health of the community, and accommodating a variety of active and passive recreational uses; while it would not provide as much open space area as the project, it would still accommodate the objective of preserving natural and cultural resources through the provision of 46.6 acres of conservation area. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. No changes to the RS-Draft EIR are needed.
I96-55	**Alternative 3--Reconfigured Project Alternative** Questions: 1) Why was this Alternative introduced? Was its intention to eliminate the berm that would destroy the visual integrity of the property?	For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.
I96-56	**Alternative 4--Reduced Project Alternative** It removes the skate and bike skill parks but still impacts the integrity of what this land really is--an ecological preserve with limited paths for the public. The visually impacting berm remains and, therefore, is a massive impact to the integrity of Alpine's heritage.	This comment is acknowledged and the commenter's preference against Alternative 4 is noted. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.
I96-57	**Alternative 5--Passive Park Alternative** The County needed to add this Alternative in order to meet CEQA requirements. It is the best "fit" for proper and respected use of the land as a passive preserve. It respects the rural character of Alpine. It diminishes the safety issues of no reasonable pathways, crime avoidance, traffic and fire impacts	The commenter's preference for Alternative 5 and suggestions for other project alternatives are noted for the record. Please see MR-10 (Passive Park Alternative) for additional information. For additional information, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No changes to the RS-Draft EIR are needed.

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	and adds immeasurably to the uniqueness of Alpine--to have a 250+ acre passive park (including Wright's Field) unique to this community. Our passive park could and should become an outstanding model for future parklands within the County that host sensitive biological habitat.	
I96-58	I suggest that the County implement protective measures and continued restorative measures to increase the land's pristine habitat varieties. Nature programs offered by rangers would help the public to continue to understand the value of maintaining such sensitive and diminishing lands. Signage explaining the different habitats would enhance the hiking experience and explain the importance of remaining on the trails. [Sidebar: When I first moved to Alpine 30+ years ago, a neighbor explained the real danger of not remaining on the trails. Previous developers had dug percolation test holes to determine if the property would percolate and sustain septic systems. These holes are supposedly all over the property and were and are presently covered by vegetation. Pretty doggone good reason to remain on the established trails even to this day.]	The project would develop a community park with an open space area. The park would include a nature play area and educational signage on site. As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with the RMP. The RMP will be developed prior to formalizing trails and before opening the open space to the public. This plan will outline management activities to be carried out by the County. A full-time park ranger, a live-on volunteer, and maintenance staff are required for the project. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. See MR-4, Natural Resource Mitigation, for additional details. As part of operations of the project, signs would be clearly posted containing park rules and regulations that would be enforced at the park. No changes to the RS-Draft EIR are needed.
I96-59	In addition, to address the need for toilets, DPR could include an on-site port-a- potty with a washing station. Thirdly, a picnic table and benches could also be added. Question: 1) Why were these additional elements not incorporated into Alternatives 1 or 5?	This comment includes suggestions regarding desired park amenities. The active park design and components are discussed in Chapter 3, *Project Description*, and Chapter 6, *Alternatives.* Please see these sections for descriptions of proposed features and amenities of each build alternative. No changes to the EIR are needed.
I96-60	**Environmentally Superior Alternative** County's conclusion that Alternative 4 is the superior alternative just does not make any sense when you compare it with Alternative 5. The reasoning that DPR gives is that Alternative 5 will not meet the County's goals. Is it not time for	For an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.

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	the County to realize that their prescribed goals are NOT suitable at this particular location?	
I96-61	DPR needs to understand their intentions when they bought this property of building playing fields (according to Ret. Supervisor Dianne Jacobs' parting words to Alpine) was short-sighted and insensitive to the overall vision of Alpine. Jacobs was perhaps misled by the County and AGPG that this property was suitable for such fields. Jacobs was front and center in promoting the Stagecoach Ranch development on what is now Wright's Field. Jacobs later endorsed the value of preserving this land and making it a part of the MSCP. So it confuses me that she would endorse this particular "playing fields" park on this piece of property. Jacob's wishes for playing fields have already been met with the $900,000 County investment in partnership with Joan McQueen Middle School. It would be a wonderful gesture that if Alternative 5 is accepted, that this passive park be named after Jacobs who did so much for her county residents.	This comment does not raise specific issues related to the analysis of physical environmental impacts presented in the RS-Draft EIR. The commenter's preference for the Passive Park Alternative is noted for the record. No changes to the RS-Draft EIR are needed.
I96-62	**Conclusion** In conclusion the most ideal Alternative would have been to create Alternative 6: In addition to implementing Alternative 5, the County would use the remaining monies allocated to create mini-parks that are located in the high-density area of the Village or at least pay for the implementation of the Alpine Loop. Question: 1) Why were these not considered? 2) Why was the multi-parks vision not considered, especially since it fits Alpine's needs and in their appropriate locations?	The commenter's preference for Alternative 6 and Alternative 5 is noted for the record. For an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. The alternatives analyzed in the environmental document were each assessed against the project objectives in Chapter 6, *Alternatives*. No changes to the RS-Draft EIR are needed.
I96-63	It appears the County did less than adequate surveys and studies to access the "whole picture", using antiquated approaches to fulfilling the needs of this community. The County ignored the variables imperative to planning an appropriate park for Alpine and, effectively, failed to serve the community. One might ask, did the County mistakenly purchase this land? As a long-time resident and advocate of maintaining our rural	The commenter's opinion regarding adequacy of the RS-Draft EIR and the expressed opposition to the project are noted for the record. Alternative 5 – Passive Park Alternative has been analyzed in RS-Draft EIR Chapter 6, *Alternatives*. Please refer to MR-10 (Passive Park Alternative) for further details. No changes to the RS-Draft EIR are needed.

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	and cultural heritage, I say "No"; the county added the "finishing touch" to include this land with Wright's Field's preserve. If the County can re-evaluate its narrow-minded attitude and embrace the property as a passive park, it then achieves a win-win situation and, for that, I and my community would say "Thank you."	
I96-64	I am Annie Norton and am a resident of Alpine for 30 years. I have a personal attachment and historical knowledge of Wrights Field because I was one of the core opposers to the Stagecoach Ranch development. I know what it took to preserve this unique land and I am definitely opposed to the County's current plans for this park.	This comment does not raise specific issues related to the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I96-65	I thank the County for purchasing the 98 acres and completing the remaining open space of Wrights Field. It came as a relief to hear that the plans were to basically leave the land "as is" except for perhaps 10-15 acres. This meant that the County "got it"; they understood how valuable open land and passive parks are. Passive parks give people the chance to reconnect with Nature and to understand Nature's restorative powers– so important to our overall health and appreciation of our planet. I am having a huge problem wrapping my head around this oxymoron: A park on top of an existing park. It boils down to a Fabricated Park–the one the County is now proposing– vs. a Passive Park–the one they led us to believe we were going to continue to have. I advocate for the Passive Park and honor the land's worth as such. There is a small patch of disturbed area that could be converted to a small parking area and is a needed safety feature.	This comment does not raise specific issues related to the analysis of physical environmental impacts presented in the RS-Draft EIR. Wright's Field is not the proposed open space portion of the project. The County would be preserving land adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. The commenter's preference for the Passive Park Alternative is noted for the record. No changes to the RS-Draft EIR are needed.
I96-66	Transparency is needed between the County, our local officials and the public to understand this park's evolution. We have a right to know how the park exploded in size, snowballing into a park designer's Disneyland-of-sorts. The County openly admits, almost with pride, that it has taken them over 25 years to bring a county park to Alpine. It feels	The current state of the County's parcel is not open space or a park. Wright's Field is not the proposed open space portion of the project. The County would be preserving land adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the

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	like in order to make restitution for their lack of motivation, responsibility or whatever you want to call it, they now need to condense every kind of contrived recreational experience into this piece of land, plunk it down in a location where it simply does not belong and then shove it down our throats. Those present at the last meeting with the County will remember the County biologist basically saying, "You are getting this park whether you like it or not." Hmmm….that is not what I consider collaboration with the public. I ask our local leaders to postpone their recommendation of the current park plans and to objectively reevaluate how credible this proposed park really is and if it truly meets the needs of our community. The grandiose bells and whistles that are packed into this design can be very persuasive. But not at this location. I challenge our community leaders to see the obvious and do what is right. We already have a park, passive as it is. It is actually being used and appreciated daily.	open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. No changes to the RS-Draft EIR are needed.
I96-67	I want to embrace and thank every single one of you who have joined Preserve Alpine Heritage (PAH), those who signed the Greater Alpine Fire Safe Council petition and those who just plain care about what may happen to a portion of what we know as part of Wright's Field. You are a very well-represented group and kudos go out to you! It is extremely difficult to have to stand up and vocalize opposition especially when your voice will likely not be fairly heard or often misconstrued. You wearily know it will be an uphill battle. Some are filled with stage fright making it impossible to actually speak at a meeting. It is exhausting to formalize your thoughts into words. It is very, very possible that you have absolutely no extra time to address one more issue that affects your life. It is easier to let things pass because of the monumental effort that it takes to be confrontational. It is easier to allow elected officials and the local government to make choices and then read about those decisions. Don't we all really want to just feel content and secure and safe? To find contentment in our cocoons, our	As stated above, the current state of the County's parcel is not open space or a park. Wright's Field is not the proposed open space portion of the project. The County would be preserving land adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. See MR-4, Natural Resource Management and MR-9, Wildfire, for additional information. No changes to the RS-Draft EIR are needed.

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	homes and our families and our friends? To live out our lives in the community of our choice? And sometimes, just be left alone? One can talk oneself blue-in-the-face trying to convince and persuade a person with opposing views. One is rarely successful. Rather than become despondent and totally disappointed I have adopted a motto: "You can't fix stupid–especially to those who sell their souls." And my motto can apply to elements that surround the Park.	
I96-68	Because of you and your relentless push to be heard (again thank you), a special meeting was called on Tuesday, April 6 by the Alpine Community Planning Group to discuss the proposed location of the County Park. The County provided a polished presentation describing their plans. Oddly and questionably, Travis Lyon, chairman of the ACPG and a board member of Back Country Land Trust also gave a slide presentation showing various birds-eye-views of different parks throughout the County that are considered active use parks. His point was to try to convince the audience that our Park should not be considered a park filled with active sports fields. The slideshow backfired and, in fact, displayed our Park to be filled with these active fields. But more confusing and disturbing was Mr. Lyon, who chaired the meeting, displayed an overt bias towards the Park. His presentation was highly inappropriate. PAH's presentation was worthy of praise, remaining focused on the central issues and offering legitimate alternatives. Strong work (and a lot of work to prepare!) Remember, this meeting was touted to all in Alpine as the time to speak up about the Park. Interestingly, out of the 20 public comments only two were positive for the park. One was the Mountain Bike Association, a well-managed organization with one specific agenda: to lobby for as much land as possible to include mountain biking. Ms. Murphy made a point to say they partner with BCLT.	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. Please refer to MR-11 (Public Outreach) for more information regarding the public outreach efforts conducted for the project. No changes to the RS-Draft EIR are needed.

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I96-69	This is where it starts to get dirty, in my opinion. The only person from Alpine supporting the park was Sharon Haven who identified herself as living in Alpine over 60 years. She is the wife of ACPG member Al Haven. Ms. Haven runs a land use strategy consulting company. It was her comments which planted the "fear" seed: quit complaining; we have waited so long for a park; what if the County ditches the entire project and puts its up for sale; we could end up with nothing; why do people have to be so resistant to this Park; the County bought a huge amount of open space and at least some of it should be used as a Park; think of the apartment dwellers; be happy with what is offered (and basically, shut up). Her intent was to plant the first seed of fear. After all the comments had been made, ACPG members had the expected discussion period. The very last speaker was ACPG member Richard Saldano. Referring to Sharon by name, he thanked her for reminding him that if the County backs out, developers will sweep in and grab up this "goldmine" because it is so cheap and then develop the land to their hearts' content. We would get more houses and no Park. Boom! Got the jugular! Mission accomplished: Fear was definitely injected, even though Mr. Saldano's projections are based on falsehoods and not facts. Both Ms. Haven's and Mr. Saldano's comments were planned and orchestrated to play the fear-factor and to distract from the oppositions' valid comments. Their bald-faced threat was: If you do not take it the way it is presented, you will lose it all. This deceptive and manipulative charade was coordinated to achieve just that: Fear. Right, George Barnett? But there are two big problems: we are not stupid and we are not ignorant. So, chin up and carry on. Know there are a bunch of you who feel the same way. The fight is not over in the least. Continue to unite. Keep supporting each other and we'll all become a stronger community together.	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. Please refer to MR-11 (Public Outreach) for more information regarding the public outreach efforts conducted for the project. No changes to the RS-Draft EIR are needed.

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I96-70	Friends, neighbors, those who oppose the proposed Alpine County Park and those who think this park is the cat's hot pajamas, you need to know a recent discovery within the dubious confines of the Draft Environmental Impact Report (DEIR). All of us have been duped, bamboozled and cunningly deceived without honest interest in the public's participation or the desires of the community. Remember when we asked why the alarming change in size of the park from a 10-15 acres of passive park to a 25 acres of active park? Remember we could never get a straight, simple answer why the results of the public input meetings San Diego County Department of Parks and Recreations (DPR) held to determine what the community really wanted never aligned with the results of the public input? Remember most of the amenities did not even come close to the public input? Remember when DPR and the vocal members of the Alpine Community Planning Group (ACPG) assured all of us that this park was a "local" park, meant for the locals to benefit; that, in no way, this was or ever will become a "regional", mega sports complex that would serve all of the County? Remember we have all along asked what was the price tag to build and maintain this park and where was that money coming from and were never granted an answer? And remember DPR always remained evasive, never giving us a straight answer to any of these questions and concerns?	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. No changes to the RS-Draft EIR are needed.
I96-71	We now have our answers to the above quandaries: a mega regional sports complex park has been planned and designed from the get-go and the proof is in how on October 20th DPR sought and received Prop. 68 funding that the Board of Supervisors just approved, again with overwhelming opposition. Put the puzzle pieces together: Prop. 68 funding can only be used for construction of a regional park and must include	The project will be funded by County General Funds and is a local park intended for the Alpine community and its residents. Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-12 (Parks Master Plan) for information on local park needs in the Alpine community. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the

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	amenities that will attract visitors from a 20-mile radius or region wide. Virtually ALL the design elements comprised in the proposed park meet this prerequisites. In other words, this park and its design has been planned from the get-go to be a mega regional sports complex that will attract far more people than those in our local community. This park is meant for the entire region. Prop. 68 defines a "sports complex" as multiple sports fields or courts/ courses. The proposed park includes a baseball field, basketball court, and pickleball court, among many other amenities, thus easily meeting the "sports complex" definition. DPR designed this park to be a Regional Park from the onslaught but at the same time giving the public lip-service, essentially deceiving us all the while. Did our local governing group, the ACPG, know of this "bait and switch" during the inception and throughout the development of the park's design? You draw your own conclusions.	alternatives considered but rejected. No changes to the RS-Draft EIR are needed.
I96-72	And remember how we questioned the inordinate amount of parking spaces that unreasonably exceeds any of our existing public parking lots in town? Per the DEIR, the park is anticipated to attract 500 people a day, that is 3,500 extra visitors on our roads per week without any improvements to improve safety of our roadways. DPR never cared about the community's desires. Their goals were dead set in including as many amenities from the Prop. 68 list as possible. Throughout all the public comments this design has not been altered. DPR's own data collected at their public input meetings does not support the need or desire for the amenities that are presently included in the proposed park. So from its inception DPR knew what they wanted, a Mega Sports Complex come hell or high water…you remember their biologist telling us that you are getting this park whether you like it or not.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-12 (Parks Master Plan) for information on local park needs in the Alpine community. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives considered but rejected. No changes to the RS-Draft EIR are needed.
I96-73	What is vital for all of you to know is that there are four Project Alternatives DPR provided, none of which resemble	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-

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	what the community was originally told this park would resemble – a small nature- based passive park. The following is quoted from the DEIR: Alternative 2 — Sports Complex Alternative "Under the sports complex Alternative, a greater area of the project site would be allocated to active recreational uses and would include sports fields intended for competitive sports, including club soccer and baseball teams. Under this alternative, a total of 50 acres of the project site would be developed with multi-use turf areas for soccer, etc, as well as baseball fields, and other features described in Section 3.3.1 of Chapter 3, including a skate park and an equestrian staging area. In addition, because this sports complex would be intended to accommodate competitive teams, extended hours would be allowed and field lighting for nighttime activities would be installed. The number of parking spaces would also be increased to accommodate the increase in parking demand that could occur with the larger active recreational space. The remaining 46 acres of the project site would include open space/conservation area for which a Habitat Conservation Plan would be created." Why in the world would such an alternative even be considered? Unless we have been totally blindsided by the pro-park people, not once has it been even fathomed that this "Community Park" would ultimately become the sports complex of the future. So now you know: we all have been intentionally misled. God only knows what else will be discovered hidden within the layers or strategically left out of the DEIR. It is time for a professional legal team to take over the reins. A well-respected environmental firm has been hired by Preserve Alpine's Heritage to write a comment letter and truly represent our community, our resources, our essence of the uniqueness of Alpine and our environment.	12 (Parks Master Plan) for information on park needs in the Alpine community. The project would be implementing a local park and open space on the current County land. Please refer to Chapter 6, *Alternatives* for a full discussion of the five alternatives considered in the environmental analysis: Alternative 1, No Project Alternative; Alternative 2, Sports Complex Alternative; Alternative 3, Reconfigured Project Alternative; Alternative 4, Reduced Project Alternative; and Alternative 5, Passive Park Alternative. Alternatives considered but ultimately rejected are also discussed in Chapter 6, *Alternatives*. No changes to the RS-Draft EIR are needed.

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	To learn more about Preserve Alpine's Heritage visit: www.preservealpinesheritage.org Do not just give up. It is not over 'til the fat lady sings.	

Comment Letter I97: Norton, Courtney, February 27, 2023

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I97-1	Thank you for the extension of time to provide comments. The reasoning behind why the comment period was extended was not clear. It became evident after reviewing that the documents had been updated after my second review began. Was the extension of two weeks enough time for the public to begin their review and comments of the updated version distributed in January on such a large document truly enough time? Why was this not made clear in the email sent by the CEQA email account requiring the public to learn this information in the attached flyer or webpage?	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. The commenter also included copies of comment letters submitted on the Draft EIR, which the County responded to in the Final EIR and do not constitute new substantive comments on the RS-Draft EIR. The County replaced Section 4.4, *Biological Resources*, completely in December 2022 to analyze impacts more fully on special-status species. After the Notice of Availability was issued for the RS-Draft EIR, the County replaced the *Preface*, *Executive Summary*, Section 4.9, *Hazards and Hazardous Materials*, Section 4.20, *Wildfire*, and Chapter 6, *Alternatives*, to correct minor typographical errors. No new information was presented in these replaced documents. To account for these typographical errors, the County extended the public comment period for the RS-Draft EIR by 14 days for a total review period of 74 days. No changes to the RS-Draft EIR are needed.
I97-2	Alpine County Park (sdparks.org) website is not updated on the status of the park which is misleading to the public. According to County of San Diego Parks and Recreation (DPR) in a May 2022 meeting, the Park Concept has changed. On this website it states the status of the Draft Environment Impact Report (DEIR) mentions the comment period of 2021, not the February 2023 status of recirculated DEIR. If the public were to google Alpine Park this is the information they would find. It is much harder to navigate to the page with the Recirculated DEIR.	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. The Notice of Availability included a link to the Draft EIR. The County website has been updated to include the most recent project information. No changes to the RS-Draft EIR are needed.

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I97-3	The source path for the DEIR, Public Review Documents (sdparks.org), is also misleading. For full transparency and accuracy, can you please clean your website sources up so the public has one location to access the most current status?	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. No changes to the RS-Draft EIR are needed.
I97-4	There have been multiple Public Record Requests (PRA) requests made to DPR and the Alpine Community Planning Group (ACPG) between 2022-2023. These documents are too large to submit via email and DPR should have these on file. ACPG should have these files also available. I request all PRA records be submitted to the public record. Below are Google Drive links to all documents. Please confirm these documents are added to public record: https://drive.google.com/drive/folders/1dr3XriegdIUOY2GjVJ6MQ-KNsBAehmkP?usp=share_link https://drive.google.com/drive/folders/1iTAJJK9vvFZfMVoJz9Tzop70jfoXJh38?usp=share_link https://drive.google.com/drive/folders/1dqn1QsDUKBbQjpZ94sDn8CP3rCPrlgLK?usp=share_link https://drive.google.com/drive/folders/15I9IslGK7mGMmoLptYER9UnTArQ-74gc?usp=share_link	Please refer to MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input. No changes to the RS-Draft EIR are needed. These documents will be uploaded to the public record.
I97-5	Throughout the entire process, the public has requested information on the properties surveyed for joint use for mini-parks and has been denied. It is evident throughout the PRAs that proper analysis of these properties was not completed. In California Department of Fish and Wildlife's (CDFW) Notice of preparation letter dated April 7, 2021, they asked that other locations be considered (attached letter for reference). This seems to have been ignored during the original Environmental Impact Report and the Recirculation Draft Environmental Impact Report. Please provide justification of why other locations have not been considered and share this information with the public.	The commenter's suggestion for an alternate location is noted. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a discussion of the alternatives considered including the Alternate Location Alternative. No changes to the RS-Draft EIR are needed.
I97-6	In CDFW's original DEIR letter regarding mitigation for the grasslands (letter attached for reference), they said that offsite mitigation is necessary. The recirculated DEIR states that the	Mitigation for native grasslands was revised in the RS-Draft EIR in consultation between the County and the wildlife agencies

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	mitigation for the destruction of the grasslands would be in Wright's Field. This is confusing, Wright's Field is already a preserve. How can Wright's Field be used for mitigation?	(CDFW and USFWS). See MR-3 (Native Grassland Impacts) for additional details. No changes to the RS-Draft EIR are needed.
I97-7	As disclosed within the PRAs, DPR was communicating with members of the ACPG, who were giving insight on how to communicate with the community and attempting to silence the majority voice. ACPG members were having backdoor conversations with DPR staff and keeping the community in the dark regarding the proposed park. As a community member this is offensive and unethical. Where is the transparency with the community's lead agency? Were there violations of Brown Act as a result?	Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts and scoping period. No changes to the RS-Draft EIR are needed.
I97-8	3-12 MM-BIO-6: Burrowing Owl Preconstruction Surveys: According to Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012) which the DEIR said it will be using, it suggested three or more surveys to be conducted. Yet the DEIR only mentions two surveys and a 30-day time between the surveys even though it is suggested to be three surveys. Was this a mistake in the DEIR? When is construction scheduled to begin? In addition, please be sure to follow the proper measures if it is not burrowing owl breeding season as special care will be needed. What is your source for 300 feet observation during construction? Documents state it should be 600 meters (almost 2,000 feet). Burrowing owls were also observed by the public on Tuesday, March 2, 2021.	**MM-BIO-6: Burrowing Owl Preconstruction Surveys** follows the Take Avoidance section of Appendix D of the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). If burrowing owls are observed during pre-construction surveys, coordination with CDFW and USFWS will occur to avoid potential impacts on burrowing owls. Per the *San Diego County Bird Atlas* (Unitt 2004), breeding burrowing owls have disappeared from much of their historic range and currently occur in approximately five areas of San Diego County; the Alpine area is not one of these locations. The burrowing owl is migratory over much of its range and may occur outside of its breeding areas during winter; the *San Diego County Bird Atlas* shows that the Alpine area has documented wintering individuals and a wintering individual was observed on the County parcel and referenced in BRR for the project. While the species is not known to breed in the Alpine area, focused surveys for burrowing owl were nevertheless conducted. The burrowing owl is covered by the San Diego MSCP County Subarea Plan and conditions of coverage for this species require a 300-foot-wide impact avoidance area (within the open space) around occupied burrows. No changes to the RS-Draft EIR are needed.
I97-9	What is the anticipated timeline for construction? According to the DEIR, construction cannot be done during the	Pre-construction nesting bird surveys would be conducted in accordance with **MM-BIO-5: Avoid and Minimize Impacts on**

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	breeding/nesting season "to keep the project in compliance with state and federal regulations…the bird breeding season is defined as January 15-September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15". In addition, the pupping season of roosting bats is typically April 1 through August 31. This would mean that the County has only 4 months a year to do any sort of construction. What will happen to the construction during the 8 months that breeding/nesting season occurs? Will The public look at disturbed land? You must comply with state and federal regulations.	**Special-Status Avian Species and Other Birds Protected under the MBTA** to avoid direct mortality of eggs, chicks, or adults during the breeding season. Bird surveys would be conducted by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities and will also survey for raptor nests up to 1,500 feet from proposed ground- or vegetation-disturbing activities to ascertain the presence of actively nesting raptors or other migratory birds on the project site or in a vicinity that could be indirectly affected by work activities (i.e., through noise or visual disturbances). Please see **MM-BIO-5** for additional information on nesting bird surveys. Additionally, per **MM-AES-1: Install Screening Fences Along the Active Park Boundary**, County DPR or its contractors would install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing would extend around the approximately 25-acre active park boundary. The construction fencing would be installed in phases so construction equipment, materials, and ongoing construction activities would not block existing views that are available on the site. In this way the construction fencing would not block the entire approximately 25-acre site at any given time. The construction fencing would remain as long as construction activities are occurring on the project site. The project would comply with County, state, and federal regulations. No changes to the RS-Draft EIR are needed.
I97-10	In conclusion, DPR needs to go back to the drawing board.	This comment expressing opposition to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I98: Norton, Dominique and Ogle, Kyle, February 27, 2023

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I98-1	We believe that the Draft Environmental Impact Report (DEIR) and the Recirculated Sections of the DEIR (RS DEIR) have not addressed the issues raised in our original comment letter dated November 15, 2021. We request responses to the concerns and comments our letters raised.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's concerns about the project are noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter also included copies of a comment letter submitted on the Draft EIR, which the County responded to in the Final EIR and does not constitute new substantive comments on the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I98-2	INADEQUATE ALTERNATIVES CONSDIERED The RS DEIR fails to comply with California Code of Regulations (CCR) Title 14 Section 15126.6. Per CCR Title 14 Section 15126.6(a) "…An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." An EIR "must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." EIR should include "a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" (CCR Title 14 § 15126.6(c). The RS DEIR fails to comply with CCR Title 14 § 15126.6 based on the "No Project" and "Passive Park" alternatives.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. This complies with CEQA Guidelines Section 15126.6(c), which states: "The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." No changes to the RS-Draft EIR are needed.
I98-3	The RS DEIR includes a "No Project" Alternative (Alternative 1) stating "the site would remain undeveloped and would not	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but

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	include 25 acres of active recreational uses..." and further states "the creation of a Habitat Conservation Plan for the remaining 71.6 acres would also not occur under this alternative". The RS DEIR fails to comply with CEQA in that what is included is NOT a "No Project" Alternative. A true "No Project" Alternative should have been included which assumes the continuation of existing conditions on the Project site through a Habitat Conservation Plan, meaning the site would remain an undeveloped open space area.	rejected, as well as the alternatives that were analyzed. The specific alternative of "no project" was evaluated along with its impact. The "no project" alternative is the circumstance under which the project does not proceed. This discussion compares and identifies the practical result of the project's non-approval on the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. The purpose of describing and analyzing a no project alternative was to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The No Project Alternative analysis is not the baseline for determining whether the project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis that does establish that baseline (see CEQA Guidelines Section 15125). No changes to the RS-Draft EIR are needed.
I98-4	While I appreciate that a "Passive Park" Alternative was included in the RS DIER as many members of the public including myself requested that this alternative be selected at this site, it is still disappointing that a thoughtfully included passive park was not included and thus dismissed since it didn't meet "most of the basic objectives of the project". The RS DEIR "Passive Park" Alternative (Alternative 5) states the "…site would be developed with a 0.23-acre passive park" and further states "…a formalized parking area with access to the existing trails through disturbed areas to ensure that no vegetation would be affected. The Passive Park Alternative would establish the existing 1.1 miles of multi-use trails for public use." The passive park that was included missed the mark. The RS DEIR fails to include a passive park that the public has continuously advocated for, a nature-based passive park, which could have included numerous features to "feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" and thus been the "environmentally superior alternative". This passive park could have been included to meet the definition of either a "open-	This comment is acknowledged. See MR-10 (Passive Park Alternative) for additional information about the Passive Park Alternative that was analyzed in Chapter 6, *Alternatives*, of the RS-Draft EIR. Please refer to MR-11 (Public Outreach) for more information regarding the County's public outreach efforts. No changes to the RS-Draft EIR are needed.

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	space area" or "preserve" as defined in the County's General Plan and the Alpine Community Plan thus furthering the goals of these plans. Decision makers were not presented with an alternative that could have been reasonability considered as part of this CEQA process.	
I98-5	The RS DEIR states the "Reduced Project" Alternative (Alternative 4) "would be the environmentally superior alternative because it would feasibly attain most of the basic objectives of the project while lessening significant effects of the project. Under the Reduced Project Alternative (Alternative 4), the largest number of significant impacts would be reduced by eliminating the bike and skate portions of the active park." However, this Alternative would directly impact native grassland and Engelmann oak woodland which provides habitat to listed species and species of special concern. This property is within the Multiple Species Conservation Program (MSCP) and a core wildlife area within a Pre-Approved Mitigation Area (PAMA). Per the MSCP, PAMA "…was developed based on a series of models that determine the best area to assemble the Preserve. The PAMA encompasses the area with highest biological value in the South County Plan Area, where the Covered Species and their habitats are most likely to be found." Any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands that have already been preserved in Wright's Field using County funds. Alternative 4 conflicts with the goals of the County's County General Plan Conservation and Open Space Element to "…minimize future development in areas with significant natural resources that are identified in the Conservation and Open Space Element".	This comment is acknowledged. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. No changes to the RS-Draft EIR are needed.
I98-6	The RS DEIR states the Alpine Community Plan includes a "Policy/Recommendation 1: Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest and nearby lakes and wildlife preservation areas." The RS DEIR claims that "The project would not substantially interfere with the movement of any native	The term "wildlife corridor" is a specific term that is used when assessing or discussing wildlife use of an area; lack of a wildlife corridor designation is not meant to imply that wildlife would not use or move within or through a given area. While specific definitions can vary, a *wildlife corridor* is typically defined as a landscape feature, usually relatively narrow, that allows animal movement between two patches of habitat or between habitat

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	resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites would also disrupt the existing wildlife corridor" and the site is effectively an "island" and not utilized as a wildlife corridor. This is an unfounded claim as mule deer have been observed by residents in close proximity south and southeast of the project site and by residents close to Alpine's Post Office on the north side of Wright's Field. The observation of mule deer can indicate the presences of predator species such as mountain lions. The RS DEIR fails to adequately survey for the presence of species that utilize the site as a corridor.	and geographically discrete resources (Ogden 1996). *Habitat linkages* are defined as larger habitat areas that provide connectivity between habitat patches as well as year-round foraging, reproduction, and dispersal habitat for resident plants and animals (CBI 2003). Therefore, habitat linkages serve as wildlife corridors, but the reverse may not be true. The project would implement a park and open space on the current County land adjacent to Wright's Field to provide contiguous open space land. An RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Development of the project (the active park and the open space) would not interfere with connectivity or wildlife corridors because the active park would be on land that is adjacent to existing development on three sides (north, south, and east) and would be directly adjacent to a busy arterial road, South Grade Road; the existence of these features currently limits wildlife movement in the area. No changes to the RS-Draft EIR are needed.
I98-7	The Hazards and Hazardous Materials Section of the RS DEIR references a 2008 letter regarding a proposed high school on the same site as the proposed park. The RS DEIR states, "A March 20, 2008, letter from DTSC to the Grossmont Union High School District dated March 20, 2008, concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials at the project site". This reference is used in this Section as a way to avoid the need for a present-day assessment of the project site for hazardous materials. Yet a letter dated February 20, 2009 in which the San Diego Department of Parks and Recreation co-signed regarding the same high school proposal (attached) has been completely ignored. The 2009 letter states development of this EXACT site has "…significant and not mitigable… biological resources". The	The proposed high school envisioned in the 2009 Draft EIR for High School Number 12 (ICF 2009), was more than twice the size of the park proposed at 50.6 acres compared to approximately 25 acres for the park, in addition to the Alpine Park Preserve for the this project. In the site plan for that project, there were also proposed educational facilities directly adjacent to and within a few feet of the eastern border with Wright's Field, whereas for this project, no facilities are proposed for 600 to 800 feet from the Wright's Field Preserve. Because the 2009 high school project is substantially different in terms of size, bulk, and configuration, the conclusions in the two Draft EIRs are justifiably different in terms of the edge effects expected on Wright's Field. See MR-2 (Indirect Impacts on

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	site is in a "…Pre-Approved Mitigation Area (PAMA) and adjacent to Wright's Field Preserve, an integral part of the County of San Diego's South County Multiple Species Conservation Program (MSCP) Subarea Plan…Loss of this much grassland habitat would impact the overall function and viability of the grassland including the lands that have already been set aside as preserve with significant expense to the County and community." Development of this site "…would result in a direct and cumulative conflict with the San Diego County MSCP Subarea Plan…Any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands that have already been preserved with significant expense to the County and community. Additionally, indirect effects associated with lighting, noise, invasive plants from landscaping, and ground moisture changes from irrigation runoff and impervious surfaces would also negatively affect the surrounding natural and preserved areas…" Since the 2009 letter was signed, the resources have not changed thus any development of this site would cause the same direct and indirect impacts. Development of the site as anything short of a passive park/open space would cause unmitigable impacts and thus be a violation of the CEQA.	Wright's Field) for a discussion of indirect impacts on adjacent resources.
I98-8	The RS DEIR fails to include "…a reasonable range of potentially feasible alternatives" and falls short to "…foster informed decision making and public participation." (CCR Section 15126.6(a)) thus the RS DEIR is in violation of CEQA.	Please refer to MR-12 (Parks Master Plan) for further details regarding the County's need for parkland in the Alpine Community. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR, which examines a range of project alternatives and explains the reasons for rejecting other potential alternatives. This complies with CEQA Guidelines Section 15126.6(c), which states: "The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the

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		scoping process and briefly explain the reasons underlying the lead agency's determination." The alternatives analysis is also in keeping with CEQA Guidelines Section 15126.6(a), which states in part: "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." The analysis of alternatives is not required to be as detailed as the analysis of the project. CEQA Guidelines Section 15126.6(d) states: "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed." No changes to the RS-Draft EIR are needed.
I98-9	LACK OF JUSTIFICATION OF NEED The justification of need for additional park acreage used in the DEIR and the RS DEIR is based on misguided future population growth projections.	Please see the response to comment I98-8, above.
I98-10	Per page 144 of the County Parks Master Plan (December 2020), "Given both the small count of facilities and acreage of local parks in Alpine, the CPA is experiencing a 22.91-acre deficit of local park facilities to meet the standard." However, these needs are based on old populations growth projections and does not take into consideration San Diego Association of Governments'	Please see the response to comment I80-8 for why the Draft EIR utilized SANDAG Series 13. The PMP found the Alpine CPA to have a deficit of local parkland. See MR-12 (Parks Mater Plan) for more details related to the need for park facilities. No changes to the RS-Draft EIR are needed.

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	(SANDAG) Series 14 growth projections which were available prior to the release of the original DEIR as noted in the attached letter.	
I98-11	In addition, even if Alpine was deficient in parkland, the County's own Parks Master Plan (December 2020) states "…Given the significant amount of vacant land in Alpine, conversion of vacant lands to parks should prove relatively easy if funding can be identified for park construction and ongoing operation and maintenance". The RS DEIR states "mini-parks" or "pocket parks" were dismissed in Section 6 of the RS DEIR because they would not meet the DEIR's objectives. The County's own Parks Master Plan includes a map of many locations throughout Alpine that could have been evaluated and improved under JEPA and could have easily been done to meet "most of the basic objectives of the project". Since the original DEIR was released for public comments the County finished upgrades to existing fields at Joan MacQueen Middle School under a Joint Exercise of Powers Authority (JEPA). More effort should have been made to evaluate space in Alpine to create pocket parks under JEPA.	Please refer to Section 4.16, *Recreation*, of the Draft EIR for information on how the County participates in JEPAs and other agreements with public and private entities to develop and maintain recreational facilities on non-County lands. The California Association of Joint Powers Authorities defines JEPAs as the joining together of two or more public agencies to provide more effective or efficient government services or to solve a service delivery system (CAJPA n.d.). Several parks in the project area are not owned by the County but are available to nearby residents during designated hours because of a JEPA between Alpine Union School District and the County. Parks range in acreage depending on the communities they serve and the uses they permit. The parks may be joint-use facilities such as schools, community centers, athletic fields, and other recreational facilities. The County is allowed limited use of the athletic fields and recreational facilities at Shadow Hills Elementary, Joan MacQueen Middle School, and Boulder Oaks Neighborhood Park, which are owned by Alpine Union School District. The alternative locations alternative was rejected because it would not meet many of the project objectives, including creating a place where all Alpine residents can gather and connect as a community. This alternative also would not enable long-term natural and cultural resources management. Furthermore, this alternative does not meet the CEQA standard as being a "feasible" alternative given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time. No changes to the RS-Draft EIR are needed.
I98-12	Further, the various County documents including the Alpine Community Plan and the General Plan Environmental Justice Parks and Recreation Access reference the goal for 10 acres of local park land for every 1,000. However, the County should take a critical look at the use of this ratio for unincorporated	The Draft EIR utilized SANDAG Series 13 because that was the latest available SANDAG model at the time of the NOP. Generally, SANDAG Series 14 projects a much lower growth in the Alpine CPA. For example, SANDAG Series 13 projects that the population growth for the Alpine CPA would be 23,841

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	areas of the county. A 1968 study titled "Recreation in the Nations" funded by the National League of Cities, Department of Urban Studies level of service for CITIES should be "…10 acres of park and recreation land for each 1,000 inhabitants. The American Society of Planning Officials, although accepting 10 acres of parks for each 1,000 population for cities having less than 500,000 inhabitants…" however, "park and recreation departments in practice have set out to establish realistic goals tailored to community needs rather than accept theoretical standards." (attached) https://www.govinfo.gov/content/pkg/ CZIC-gv53-n26- 1968/html/CZIC-gv53-n26-1968.htm. In trying to understand if this standard should be used in the unincorporated rural areas of San Diego County, I spoke with the American Planning Association on 2/17/2023. The representative shared the level of service (LOS) ratio based on acres to population has not been an "industry standard" for 30+ years. The representative shared a paper (attached) which explains new standards for LOS. For clarity purposes, the American Planning Association is a professional organization representing the field of urban planning in the United States and was formed in 1978, when two separate professional planning organizations, the American Institute of Planners and the American Society of Planning Officials, were merged into a single organization.	residents by the year 2050 (SANDAG 2013), whereas Series 14 only projects 17,122 residents (SANDAG 2022a). Therefore, the Draft EIR and the LOS-based traffic impact study utilized a much more conservative value when projecting future traffic. No changes to the RS-Draft EIR are needed.
I98-13	I also learned that the National Parks and Recreation Association has a tool/database that municipalities can use to understand how their LOS compares to other similarly sized municipalities. An October 2020 article titled "A New Approach to Parks and Recreation System Planning" on the National Parks and Recreation Associations webpage states "…there are no longer any nationally accepted standards for parks and recreation planning. Each community must determine its own standards, LOS metrics, and long-range vision for its parks and recreation system based on community issues, values, needs, priorities and available resources." https://www.nrpa.org/ parks-recreation-magazine/2020/november/a-new-approach-to-parks-and- recreation-system-planning/ (attached). Forcing	Please see the response to comment I98-12, above. No changes to the RS-Draft EIR are needed.

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	the use of an outdated parkland-to-people ratio on unincorporated areas of the County is misguided. The County needs to take a critical look at the LOS standards being prescribed County-wide.	
I98-14	The DEIR and RS DEIR continue to fail to include the true interest of the community. The community has tried to participate in this public process but continues to be dismissed and bullied by San Diego County staff. Our interests are not adequately reflected in the proposed park. Rather, members of the San Diego County Parks and Recreation staff and multiple members of the Alpine Community Planning Group have steered the project and continue to misrepresent the community's interest. Documentation that was developed as part of the February 2019 Board of Supervisors meeting that included the vote to approve funding for the acquisition of the project site states the "Alpine Community Planning Group continues to request that the County construct sports fields." Yet, when pressed in meetings, the Alpine Community Planning Group has never substantiated their claims that the public has requested additional sports fields. Nor were these claims substantiated in records obtained from the Alpine Community Planning Group via a Public Records Act request. The County has never produced data that supports the claims that the community desires the amenities included in the park.	Please see MR-11 (Public Outreach) for details related to the public outreach process. Community and interested party feedback was incorporated into the design of the park. Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.
I98-15	CUMULATIVE IMPACTS Since the comment period of the DEIR was completed, signs stating bikes can use the full lane have been installed along South Grade Road from Tavern to Calle de Compadres, the prosed main entrance for the park. This was done without any community involvement or knowledge. In addition, the Alpine Community Planning Group has been working with the Department of Public Works to establish the "Alpine Loop" which is a DG earth path that creates a loop from the center of Alpine around the project site. This effort has been discussed publicly in Alpine Community Planning Group meetings and with the stated goal of - to provide safe access to the park.	The commenter notes that signage has been posted near the project site indicating bicyclists may use county roads. Currently, County roads permit both motor and bicycle use. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. As a separate project, DPR is working with DPW on the development of the Alpine Community Loop, which includes construction of pathways and sidewalk improvements to increase connectivity of Alpine Park to the Village center. Funding for the Alpine Community Loop project is requested as

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	Neither improvement were included in the DEIR or RS DEIR cumulative impacts section.	part of the County budget for Fiscal Year 2024/25. No changes to the RS-Draft EIR are needed.
I98-16	FAILURE TO WRITE A THOUGHTUFL DEIR Information in the RS DEIR was not thoughtfully or thoroughly updated. For example, the RS DEIR states that construction will occur in Fall 2022, references were not included correctly as in the Wildfire Section states "Rohde and Associates as 2020" yet this is a 2021 report, and the RS DEIR inappropriately references the Updated Alpine Community Plan which has not been adopted. Without a complete document, the public and decision makers are UNABLE to make an educated and thoughtful review of the proposed project.	The comment does not raise specific issues related to the project or to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I98-17	As a layperson, the Hazards and Hazardous Materials section is very hard to understand. But it is alarming that thresholds are set based on the distance to a school yet homes with young children are within closer proximity to the project site than students in the nearby schools. The RS DEIR states that it is unclear if contaminated soils are present and relied on a 2008 letter and no efforts were made to evaluate this risk in present day. The RS DEIR states "Impact HAZ-1: Potential Release of Contaminated Soil" "MM-HAZ-1 would ensure proper identification, handling, and disposal of contaminated soils if they are encountered on the project site." I am concerned for the health of my children and children in our community. Exposure to contaminated soil may occur prior to identification and proper handling, already exposing our children. The entire CEQA process for this project has eroded my trust in the lead agency and County's ability to do trusted thorough work.	The Soil Management Plan, Soil Testing and Profiling Plan, Soil Disposal Plan, and monitoring activities will provide measures to address potential soil impacts and will outline appropriate measures for workers to follow within the Safety Plan. These measures will ensure compliance with relevant regulations and best practices during construction activities. No changes to the RS-Draft EIR are needed.
I98-18	WILDFIRE SECTION I would like it to be clear to decision makers that South Grade Road is the ONLY route to evacuate the local population and is already heavily used daily. The 2021 Rohde and Associates Report provided with the RS DEIR states "Vehicle access onto South Grade Road should be carefully evaluated since this route serves as a regional route for evacuation traffic and carries significant traffic daily. Care should be undertaken to promote	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.

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	best uninterrupted traffic flow while providing safe access and egress to park facilities. Use of median turn lanes and traffic visual constraints should be included in development of access design as blind corners currently exist on South Grade Road." HOWEVER, the RS DEIR clearly states, "The project would not include any roadway improvements to South Grad Road." No improvements will be made by the County to improve safety of the roads even though their own hired consultants stress that modifications should be made to provide safe access. In addition the RS DEIR states "The project would not include any roadway improvements to South Grad Road, beyond constructing a decomposed granite pathway in the existing right-of-way adjacent to the park. The bike lanes would act as a by-pass in an emergency situation". South Grade does not have existing bike lanes. As noted above, the County recently added signs that state the bikes can share the lane for this very reason.	
I98-19	The Wildfire Section goes on to state "Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site". Alpine is a Very High Fire Hazard Severity Zone and much care needs to be taken to not contribute to this fire risk. Any increase in time to evacuate, even if it is not considered significant, could result in loss of life and property. The Wildfire Section later states "While development of the project would reduce the fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks on site." How can the County promote any development and use County-wide funds that would contribute to an increased fire risk? Is the proposed park in alignment with the February 2022, policy adopted by the Board of Supervisors which was intended to limit development in rural high fire risk areas?	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, of the RS-Draft EIR for additional information concerning applicable ordinances and regulations, and enforcement of County DPR rules and regulations that would reduce wildfire risk. No changes to the RS-Draft EIR are needed.
I98-20	BIOLOGICAL RESOURCES SECTION While I appreciate the improved Biological Resources Section, I am alarmed to see how much has changed. What I mean by this	This comment is acknowledged. Please refer to Section 4.4, *Biological Resources*, of the RS-Draft EIR for a discussion about the impacts of the project on biological resources. Section 4.4

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	is it is alarming to see how much was originally omitted in this section in the original DEIR. The public is relying on the County as the lead agency to do a detailed review of the resources along with a thoughtful consideration of impacts. The first DEIR failed to even acknowledge the presence of numerous listed species and species of special concern until the first round of comments was completed and members of the public raised these concerns in their comment letters.	also describes how implementation of mitigation measures will reduce these impacts to a level considered less than significant. No changes to the RS-Draft EIR are needed.
I98-21	The RS DEIR states "Impacts on Wright's Field Operation of Alpine Park and its associated trails has the potential to increase usage on trails within the adjacent Wright's Field Preserve." Thank you for acknowledging the very likely potential that the Alpine Park will cause spillover effect on Wright's Field. However, the claims that "…Impacts on the Wright's Field trail system from the presence of the active park are not expected to dramatically change the nature or intensity of trail usage at Wright's Field because of both the distance from the park to Wright's Field and the different usage preferences..." and "operation of Alpine Park is not anticipated to result in significant impacts on special-status plants or animals in the adjacent Wright's Field Preserve." The RS DEIR states "The presence of the active park has the potential to draw additional people onto the trails and open space/preserve areas" yet the preserve area is so limited that people will also be drawn to Wright's Field. In addition, the proposed active park will bring a new group of people to the site who might not have otherwise visited the area. It is not unreasonable for someone to continue to explore the area and venture into Wright's Field if they have just finished using the all-wheel park, or wrapped up their ball sporting match, thus the claim that "users who come to the active park for ball sports or skateboarding are not anticipated to also be hiking the distances required to access Wright's Field..." It is important to clarify that the vast majority of those who currently hike Wright's Field are accessing that property already via the County's property so "…hiking the distances required to access Wright's Field regularly…" is not unfathomable as the following statement in this section states	Please see the response to comment O11-5 and MR-2 (Indirect Impacts on Wright's Field) regarding the Wright's Field MSCP Preserve. No changes to the RS-Draft EIR are needed.

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	"users can currently park along South Grade Road to access trails within the County's parcel and do so regularly." Parking to the west of Wright's Field is limited at best as the local streets do not allow for parking to access the field. The public will continue to park on the eastern side to access Wright's Field even if the property is developed into an active park since it is the easiest access point. Parking will still occur on South Grade Road and Calle de Compadres unless no parking zones are created.	
I98-22	CONCLUSION The County continues to make no effort to modify the proposed park to meet the requests of the community. The RS DEIR should be revised to incorporate the publics wishes and to be in compliance with CEQA. Thank you for an opportunity to the RS DEIR and I look forward to reading the Final EIR.	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter I99: Nygaard, Joyce, February 27, 2023

Comment#	Comment Text	Response
I99-1	I have been a resident of Alpine for 24 years. I am concerned about the scope of and plan for the proposed Alpine County Park. Following are my comments on specific sections of the Recirculated DEIR.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I99-2	Section 6: Alternatives The stated County objectives for a park in Alpine are to provide: 1. a place for all Alpine to gather 2. a variety of active and passive uses 3. preserve a portion of the property 4. incorporate natural features 5. recreation opportunities that improve health and wellness 6. protect health and safety 7. is consistent with DPRs mission	Alternative 5 – Passive Park Alternative was analyzed in the RS-Draft EIR in Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details. No changes to the RS-Draft EIR are needed.

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	8. reflect Alpine's heritage The majority of residents of Alpine have repeatedly stated they wanted a passive park at this location. This would include an equestrian staging area, dog park, community garden, picnic and game tables, exercise stations, and trails. A multi-use field which could be used for informal games and gatherings could also be included. This would meet all the projects objectives while keeping in line with the wishes of the community.	
I99-3	However, Alternative 5, the "Passive Park Alternative" in the recirculated DEIR is not a park at all. It is nothing more that a parking lot and not at all what residents supporting a passive park meant by that. Why wasn't an actual passive park alternative included?	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to the portion of the comment about a passive park alternative, please refer to MR-10 (Passive Park Alternative) for additional information on the Passive Park Alternative. In response to the passive park alternative, the County has many passive parks that are similar in size and with similar amenities that were included in Alternative 5. These existing County passive parks include access to trails and a parking area/staging area. Examples of other County passive parks include Morrison Pond, Santa Ysabel, Flume Trail, and Sweetwater, to name a few. See MR-12 (Parks Master Plan) for details related to the parks plan. No changes to the RS-Draft EIR are needed.
I99-4	Alternative 4, the Reduced Project, which the DEIR deems the environmentally superior alternative, eliminates the bike and skate parks but maintains amenities not suitable for this location including a baseball field and basketball courts. The amenities will create noise that cannot be adequately mitigated and increase water usage over a more passive park.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. See MR-13 (Noise and Lighting) for more information on noise impacts. Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. No changes to the RS-Draft EIR are needed.
I99-5	This assessment rightfully concludes that Alternative 2, a Sports Complex, would have detrimental effects to roadway levels of	This comment expressing opposition to Alternative 2 is noted for the record. No changes to the RS-Draft EIR are needed.

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	service, significantly alter the visual character of the site, require field lighting and extended park hours, and have significant impacts on biological resources that cannot be mitigated on site. This alternative should be rejected.	
I99-6	Appendix K This section analyzes the time to evacuate the park and the surrounding areas assuming a wind-driven fire. Their analysis shows that evacuation of the proposed park and surrounding land uses would be between 1 hr. 55 minutes and 2 hrs. 53 minutes. They further conclude that the park project adding 8 to 12 minutes to that evacuation time would not be significant. I submit to you that adding 8 to 12 minutes to an evacuation during a wind-driven fire event can be the difference between life and death. I also question their "research showing there were no fire-caused deaths during an evacuation." Were they here during the Cedar Fire?	The project would not result in significant wildfire, hazards, or transportation impacts that pertain to fire risk. County Fire and Alpine FPD reviewed the evacuation analysis and conclusions derived in this Final EIR. The Cedar Fire took place in 2003, a time that predates the implementation of modern evacuation planning protocols such as the County of San Diego Operation Area Emergency Operation Plan (Annex Q, versions 2008 and 2022), the San Diego County Evacuation Planning Map book in support of Annex Q, and various other strategies and technological aids used in evacuations. Annex Q was developed based on insights gleaned from post-event analyses of major incidents, including the San Diego County Firestorms 2003 After Action Report and the City of San Diego the Cedar Fire After Action Report, among other sources and best practices. Several of these reports can be accessed at readysandiego.org, a site that the project team has examined. The knowledge derived from these after-action reports was instrumental in revising Annex Q and other pertinent documents. It is important to note that in 2003, systems for issuing evacuation alerts were not yet commonplace. As these technologies emerged, a notification system along with a targeted evacuation strategy were put into place. These methods, all detailed in Annex Q, have been effectively used in recent major fires requiring evacuation. Notably, the after-action reports for both the Border Fire in 2016 and the Valley Fire in 2020 did not report any fatalities. Examples of evacuation orders communicated through news, text messages, and other mediums are also documented in these after-action reports, which were examined by the project team.
I99-7	The Recirculated DEIR still leaves unanswered questions about septic vs. sewer (which does not exist in the area), traffic related issues, and accessibility by bike or foot. The County repeatedly states that DPW will address those at a later time. This is irresponsible at best.	Please see the response to comment O8-76. Please refer to Section 4.19, *Utilities and Service Systems*, and Chapter 3, *Project Description*, of the Draft EIR as well as MR-15 (Water and Wastewater) for information on the septic system to serve the facilities and wastewater treatment. As stated in the Draft EIR,

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		an onsite connection to an existing sewer line is one of the two options available for sewage disposal at the project site. See response to comment I88-5 for more information. For additional information on water supply assessment and wastewater, please see Section 4.19, *Utilities and Service Systems*, of the Draft EIR. The sewage disposal option that is deemed most appropriate for the project would be required to comply with all County wastewater treatment requirements. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would establish a pathway to existing Wright's Field Trails (Trail #14) that traverse the project. No changes to the RS-Draft EIR are needed.

Comment Letter I100: Onwingz, December 16, 2022

Comment#	Comment Text	Response
I100-1	Please STOP this madness! No one in Alpine wants these new developments. We are so rich in wildlife and habitat. In an era where we are all about ecology and preservation it makes NO sense to continue to rob our natural habitats in the name ...	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. The County would be preserving land adjacent to the park in perpetuity, providing contiguous preserved land adjacent to Wright's Field Preserve as part of the project. In addition, an RMP will be developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. This comment will be provided to the County of San Diego Board of Supervisors for

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		consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I101: Peck, Audrey, February 21, 2023

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I101-1	Let me introduce myself! My name is Audrey Peck. My husband and I moved to Alpine in December 2021, from the great state of New Hampshire. We not only sold our home of 38 years, we sold our family lake home in VT, and our Florida Condo to purchase this property for 1.6 Million Dollars. We gave up our lives to be near our sons in San Diego. On top of 20,00 real estate taxes and high electric, water, insurance bills, food prices and a state that loves taxes on everything we feel we are barely hanging on! Looking for a community that was rural, with great space, large house lots we were very impressed with the rural charm of this little town! Being New Englanders we love quiet walks in the fields and forests, sunset views, and quality of life that is in the natural world!	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I101-2	I have come to learn about this Community Park that the County of SD wants to develop 'to enhance the quality of life here in Alpine!' Interesting, that NONE of the Board of Supervisors live here and apparently have not listened to the Will of the people who do live here!	Please refer to-MR-11 (Public Outreach) for information regarding the County's outreach efforts to gather community input and MR-12 (Parks Master Plan) for information on park needs in the Alpine community. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I101-3	I have read the DIER for the Alpine Park Project and the portions revised and recirculated under the CEQA. Summary of Project Alternatives with Alternative 6.5.1/ 1 - No Project Alternative This lists 21 things that would not change the existing 'field of dreams!' No changes in aesthetics & visual resources, agriculture & forestry, air quality, biological resources, ENERGY USE, greenhouse emissions, and hazardous materials to name a few. Haven't you just answered your own	See MR-13 (Noise and Lighting) for more information on proposed lighting for the project. As discussed in Section 4.3, *Air Quality*, the onsite sewer treatment system's septic tanks and leach field lines would be buried underground and would not be a source of odors with proper maintenance and operation. Furthermore, the project would implement **MM-AQ-1: Prepare and Implement a Manure Management Plan**, which would reduce odor impacts from onsite manure. Moreover, the

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	question? Isn't this the standard of 'Quality of Life for Alpine Residents?' What are we missing here in Alpine? If you think we want no sunsets due to 'extended lighting of the fields, loud screams from obnoxious parents during baseball rivalries, horse manure to smell, OBSCENE waste of water use, a supervisor/ranger we have to pay and likely give a County Pension to, along with teenagers in the park smoking and setting the place on fire, stuffing the toilets with sand and paper so they overflow, leaving water running, then this Board of Supervisors know nothing about the Alpine Community! There are already plenty of baseball fields at the Middle School. Just recently thousands of tax payer dollars were spent to improve these fields!	presence of a park ranger and a full-time, live-on volunteer would further reduce the risk of unauthorized activities and enforce regulations. See the response to comment O8-76 regarding water usage. No changes to the RS-Draft EIR are needed.
I101-4	In Obective 5: 'Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness while preserving natural and cultural resources.' We have several parks in the cities throughout the SD County. If we want a large place to gather we can choose several places to go. We don't need a Regional Park in Alpine. We have a great park the way it is with trails for horseback riding, dirt bikes, walking paths for walks with dogs, and hiking as well.	Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. The project would be implementing a park and open space on the current County land. No changes to the RS-Draft EIR are needed.
I101-5	The only other alternative is Altrrnative 5 that offers a Passive Park. This is more damaging to flora and fauna, than is Alternative 1, however it is the Second Best alternative.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. With respect to the portion of the comment about a passive park alternative, please refer to MR-10 (Passive Park Alternative) for additional information on the Passive Park Alternative. No changes to the RS-Draft EIR are needed.
I101-6	Alternatives 2,3, and 4 are dismissive of the fact that we live in a high risk fire area! There are constant complaints on social media that another homeowner has lost their house insurance because of such high risk.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives that were considered but rejected, as well as the alternatives that were analyzed. Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.

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I101-7	There is blantant disregard for the people of Alpine for living in the sanctity of their own homes, able to catch the sunset from their porches, and taking a quiet stroll in the field listening to birds and watching butterflies swoon around the natural wildflowers.	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I101-8	Regardless of which politician purports 'we have plenty of water' the answer is NO, WE DON'T! Padre Dam has offered incentives to use less water and our cost of water has stayed relatively low! Imagine the price Alpine Residents would have to pay for water if they put in a unneeded park with soccer and baseball fields(again, right behind Wright's Field is the JM Middle School with several fields!) This project is ill conceived, and just a way to spend money unnecessarily.	As is noted in Draft EIR Section 4.19, *Utilities and Service Systems*, expected water usage at the project site would not be sufficient to tax the expected available supply. Please refer to MR-15 (Water and Wastewater) for more information. Moreover, conservation measures would be employed to achieve prudent management of onsite water usage. No changes to the RS-Draft EIR are needed.
I101-9	I will never forget the story about the people in this town in Arizona who woke up one morning and there was NO WATER! They thought the pump? No, they called their neighbors, they too, HAD NO WATER! They called all over town and THERE WAS NO WATER! For now, they must carry jugs and go buy water. The man interviewed said these words that pierce my ears. 'You don't think about it until all the water is gone!'	Please see response to comment O8-76. Moreover, conservation measures would be employed to achieve prudent management of onsite water usage. No changes to the RS-Draft EIR are needed.
I101-10	Towns all over America are losing their charm, their quality of life, their sanctity because someone sitting on a Board somewhere thinks they want to build something. Please, allow Alpiners to use our field as WE see fit! Not for a sports complex, not a staging area, not a ranger station, or anything of the like! Keep it a place where the symbiotic nature of man and environment coexist! I want an answer to this letter from ALL 5 Board Members sitting on the Board of Supervisors.	The commenter's opposition to the project is noted for the record. No changes to the RS-Draft EIR are needed.
I101-11	How do you think teenagers and young people behave when they are unsupervised in a large park? Do you think they smoke responsibly? Do you think they won't cause damage to bathrooms when they see a fun challenge on Tik Tok?	The project would recruit a full-time, live-on volunteer as well as full-time park rangers and maintenance staff that would enforce park rules and have regular patrols. Smoking would be prohibited at the park and within the open space. No changes to the RS-Draft EIR are needed.
I101-12	Do you know anything about the insurance if a child or adult is injured from a flying ball, or a skateboarder? Is this yet another	This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical

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	thing Alpine taxpayers will be expected to pay for on top of a park we don't want to begin with?	environmental impacts presented in the RS-Draft EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I101-13	How will our water rates be affected by the pricing at Padre Dam when the expected usage of over a million gallons every year? What happens when we wake up in drought plagued Eastern SD County and WE HAVE NO WATER?	Please see response to comment O8-76 as well as MR-15 (Water and Wastewater). Moreover, conservation measures would be employed to achieve prudent management of onsite water usage. No changes to the RS-Draft EIR are needed.

Comment Letter I102: Peck, Audrey, February 27, 2023

Comment#	Comment Text	Response
I102-1	I have written to you in hopes that the Board of Supervisors will understand the precarious position Alpine residents are already in with the almost constant drought conditions that plague us, and fire hazards that threaten us.	The County appreciates the comments submitted on the RS-Draft EIR. This is an introductory comment to more in-depth comments later in the letter. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. Please refer to MR-9 (Wildfire) and Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not expose people or structures to significant risks associated with wildfires. No changes to the RS-Draft EIR are needed.
I102-2	In communication with other Alpine residents I have learned that fire insurance is not something that comes easily. Several people have been either dropped by their insurance companies and have had to find other companies, or their insurance company has raised their rates so high that it becomes unlivable to stay here.	Regarding keeping people safe from fire, the County coordinated with Alpine FPD. Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not expose people or structures to significant risks associated with wildfires. No changes to the RS-Draft EIR are needed.
I102-3	Now add, Wrights Field, where the Board of Supervisors feel that it is somehow their right and responsibility to shove something down our throats that it is clear the majority of Alpine Citizens do not want. The structures, the heat from hundreds of automobiles with gas and oil spewing and spilling from some, the careless disposal of cigarette butts, the danger from car fires on Route 8 East and with the right wind is in the firing line of Wrights Field.	Please see the response to I102-2 above. No changes to the RS-Draft EIR are needed.

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I102-4	Excessive (no, OBSCENE) Water Consumption is another area that goes completely against the State of CA mitigation for the future of our State. Because Joel Anderson says we have plenty of water DOES NOT MAKE THAT STATEMENT TRUE! There is no other government official in the State of CA that I have heard that has EVER said those words in fact, Anderson's words are very irresponsible. The State has been in a drought for years, we all know it, and it's our job as conservationists who care about the future of our children and grandchildren, and the livability of this state for citizens for the next generations that follow.	This commenter's concern with the water usage of the proposed park is acknowledged. The Draft EIR provided impacts and mitigation measures to the project area. Please refer to Chapter 4, *Environmental Analysis*, of the Draft EIR for a discussion of project implementation in relation to environmental impacts and mitigation measures. The Draft EIR takes a conservative, good-faith approach in its environmental analyses, often assuming the greatest level of future development. Please also refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR, as well as MR-15 (Water and Wastewater), which discuss any impacts for both water and sewer services. Impacts and mitigation measures are discussed in Section 4.19.4.3. Section 4.19.2.1 also discusses the water supply and service boundary of PDMWD. Please also refer to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, which states that the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Please see response to comment O8-76 for additional information. No changes to the RS-Draft EIR are needed.
I102-5	Politicians, government officials, and the like have a responsibility to listen to their constituents, and if they don't, they don't belong in those positions. There are consequences for planners whose plans backfire, and most often that is seen in the next voting cycle.	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I102-6	Making CA safe and healthy, with clean air and water, food to table sustainability, and protecting natural resources for future generations is the best we can bring to our Golden State. We all know the danger of the water table of the Colorado River is dangerously low and has been. Most Western states rely on the Colorado River for water. It is a natural treasure. Padre Dam will be under undue hardship to use 16,000,000 gallons yearly and it will end up costing Alpine residents more in their bill. Most of of us try to use less water not MORE WATER.	Please see the response to I102-4, above. No changes to the RS-Draft EIR are needed.
I102-7	In the survey about the park there were so few people that wanted the ball fields that that plan should have been taking of the table.	The commenter's preference for retaining a passive park use for the project site is noted for the record. Please also refer to MR-10 (Passive Park Alternative) for more information regarding a

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	In summary, the majority of residents don't want the park. It does not meet any of your goals about 'adding quality of life.' It does just the opposite. There is nothing that realistically mitigates the fire hazards, and there is nothing that can mitigate the potential for graffiti, setting fires, causing destruction to the property, possible injuries to those participating in bicycle or skate board activities. A Passive Park is the only idea that makes this park any better than what it is now. A shaded structure with a few picnic tables, and a children's playground swing set/slide/climbing apparatus (playscape) would be sufficient. The schools have all the grassy fields you need for baseball, and soccer. Where do the kids ride their skateboards when people build skate parks in other cities and towns? If you guessed in the road and on sidewalks you would be right.	passive park alternative. See MR-12 (Parks Master Plan) for information on park needs in the Alpine community. The commenter's opposition to the project is noted for the record. No changes to the RS-Draft EIR are needed.
I102-8	Thank you for the opportunity to write. I am hoping that members on the Board of Supervisors vote their conscience, not for a 'popular idea at the time' that comes with a very consequential risk to residents of Alpine.	The author's preference for no project is noted for the record. The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter I103: Peck, James, February 26, 2023

Comment#	Comment Text	Response
I103-1	I moved to Alpine in December of 2021 and now have lived here for fourteen months. My wife Audrey and I chose Alpine due to its unspoiled terrain and natural beauty. We own 2 acres of naturally landscaped land surrounding our house for which we recently were awarded a Certified Wildlife Habitat designation from the National Wildlife Federation due to our "conscientious planning, landscaping and sustainable gardening' which provides wildlife with a "quality habitat" with "food, cover and places to raise their young". We drive frequently on South Grade Road on the way to the local Albertson's on Alpine Boulevard and pass the beautiful, unspoiled Alpine Park and we walk those trails often with our two dogs.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

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	In my previous town of Plaistow, New Hampshire, I served in town government in many elected positions including the Planning Board for which I was Chair for a number of years. In Plaistow, in fact, in all of New England, residents and voters have a direct control of government and politicians listen to the will of the people before proceeding. None of them would ever think of imposing a project of the magnitude of the proposed Project against the wishes of the majority of residents.	
I103-2	**ALPINE DOESN'T WANT ALTERNATIVES 2, 3 or 4:** I have read in detail about all the public outreach efforts you have conducted on this project which is summarized extremely well by the group Preserve Alpine's Heritage ("PAH) in the following link which I request that you incorporate into my submission and also request you read, and that all the Board of Supervisors read: _Summary DPR Public Outreach and Community Concern PAH 2021.pdf (preservealpinesheritage.org)	This comment is acknowledged. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I103-3	Every meeting, survey and poll on the Project did not support alternatives 2 through 4 in any shape or manner. To wit: 1. See page 4 on the link which summarizes the May 2019 Questionnaire and the August 2019 Survey. Only 2 respondents out of 141 (1.4%) wanted baseball & basketball. Only 6 (4%) wanted pickleball and 8 (6%) wanted a community garden, yet they are included in alternatives 2 through 4. Only 16 (11%) wanted a skatepark, yet there it is in those alternatives. Same with field and court lighting where the overwhelming majority did not want them. 2. See page 8: January 14, 2021- 76 of 91 (84%) of unique commentators did not support the park. Only 25 of 395 comments (6%) were in support! 3. See page 9: At the Board of Supervisors Budge Meeting in June of 2021, 214 out of 341 (63%) did not support the park. Many of those that did support it were in fact from out of Alpine and bike enthusiasts looking for bike trails and facilities here.	Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

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	4. See page 9: At the Board of Supervisors Land Use Meeting on October 20, 2021, 42 out of 52 (81%) of public comments were opposed to the park design. 5. As far as I can find, there has been no public outreach in the past two years, certainly not aimed the 15,000 Alpine residents. My wife and I have not received any outreach since we've been here.	
I103-4	**ALL OR NOTHING:** According to PAH, no one requested Alternative 5, Passive Park It is essentially the same as Alternative 1, No Project, so does nothing for our community. In fact, the Alpine Community wants a passive park with picnic areas, a natural amphitheater, play areas for children and maintained trails for hiking and riding. The non-consideration of this requested alternative certainly violates CEQA requirements The Board of Supervisors now are forced to choose all or nothing essentially.	Please refer to MR-12 (Parks Master Plan) and Chapter 6, *Alternatives*, of the RS-Draft EIR and the response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives in compliance with CEQA requirements. No changes to the RS-Draft EIR are needed.
I103-5	I am strongly opposed to Alternatives 2 through 4 because they are NOT what our community wants. I am also not strongly supportive of Alternatives 1 or 5, but 5 is closest to what the community wants. The majority do not want pickle ball! The majority do not want baseball and basketball! The majority do not want lighted courts and a skatepark!	The commenter's preference for Alternative 5 with modifications and suggestions for other project alternatives are noted for the record. No changes to the RS-Draft EIR are needed.
I103-6	**EXCESSIVE WATER CONSUMPTION/NO ASSESSMENT DONE:** I'm also very opposed to the excessive usage of millions of gallons of water to irrigate the significant turf area and trees during a severe drought and when many Alpine residents have difficulty getting fire insurance. As a past planning professional, I would never vote on the 5 current alternatives without knowing whether there would be sufficient water to irrigate. See page ES-35 & 36 of the Executive Summary, Impact4.19Utilities and Service Systems, Impact-Util-1: Operation of the Project has the potential to require new or	Please see the response to comment I102-4, above, as well as MR-15 (Water and Wastewater).

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	expanded water facilities and Impact-UTIL- 2: Insufficient Water Supplies available to serve the project during operations. The BOS are being asked to vote on alternatives 2 through 4, BEFORE even knowing the extent of these critical impacts. The "mitigation measure" offered is only that before building permits are issued the DPR will coordinate with PDMWD to ensure the capacity exists. Back in NH, our Planning Board would have rejected any proposals, before this impact was known. I would strongly suggest that this assessment be done not just by PDMWD before voting, but also with a non-biased state agency to ensure the conflicting profit motive of Padre Dam does not bias that assessment. Also, alternate uses of the millions of gallons of water MUST be looked at. California has many competing needs of water and I would suggest that another sports park in a community that doesn't want it is seriously irresponsible.	
I103-7	**WILDFIRE IMPACT:** See page ES-36 of the Executive Summary: Impact 4.20 Wildfire. It states that "Implementation of the project would not result in any potentially significant impacts related to wildfire'. Clearly, that's an absurd statement given the significant number of trees added to the park in Alternatives 2 through 4. There are no trees there today, so any wildfire would not spread as quickly as it would with a sports park	Please refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR for discussions regarding how the project would not expose people or structures to significant risks associated with wildfires. See MR-9 (Wildfire) for additional information. No changes to the RS-Draft EIR are needed.
I103-8	**TRAFFIC EMISSIONS & SAFETY:** I see no study of the impact of increased traffic on the environment or public safety. Back in NH , the plan would be thrown out by the town Planning Board and the State until those studies are done. No Supervisor should vote for alternatives that increase greenhouse gases and endanger the citizens of Alpine without a traffic survey. South Grade Road has been the site of many accidents and the park would definitely increase the risk.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. Please also refer to MR-8 (Greenhouse Gases and Energy). No changes to the RS-Draft EIR are needed.
I103-9	**EXISTING BALL FIELDS:** Finally, I would point out that there are ball fields within a mile of the proposed park at Joan MacQueen Middle School that the	Please see MR-12 (Parks Master Plan) for information on park needs in the Alpine community. This comment does not raise specific issues related to the adequacy, accuracy, or

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	county has access to. These fields are underutilized as is. Why not use them? Who needs more fields?	completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I103-10	**SUMMARY:** The DEIR has significant flaws and is not in the best interest of the 15,000 Alpine residents. The Board of Supervisors, especially District 2 Supervisor, Joel Anderson, who lives in Alpine, have not listened thus far to the Alpine community. Alternatives 2 through 4 should not be chosen. It's time to sit with the community and create a passive park that protects the environment, meets the needs and wants of Alpine residents, and meets the EIR objectives.	The commenter's opposition to Alternative 2 and Alternative 4 is noted for the record. The Passive Park Alternative was included in the RS-Draft EIR. This alternative includes a smaller, nature-based park. Please see MR-10 (Passive Park Alternative) for additional information. No changes to the RS-Draft EIR are needed.

Comment Letter I104: Phelps, JP, January 10, 2023

Comment#	Comment Text	Response
I104-1	Where can I find a detailed map of the new proposed park in Alpine along South Grade Rd? I want to see exactly what the boundaries are for the park itself within the stated parcel numbers; including the entrance/exit roads.	Please refer to Figures 3-1 and 3-2 in Chapter 3, *Project Description*, of the Draft EIR for maps of the project including project boundaries and entrance and exit roads. The property Assessor's Parcel Numbers for the proposed park and open space are 404-171-12 and a portion of 404-170-63. No changes to the RS-Draft EIR are needed.

Comment Letter I105: Plis, Judy, January 30, 2023

Comment#	Comment Text	Response
I105-1	As a resident of Alpine, I am totally against the proposed project that is currently proposed for Wright's Field. we do not need to have multi use Turf areas, baseball field, all-wheel area, bike, skills area, recreational courts fitness stations restroom facilities, play area etc.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I105-2	People who move to Alpine like the open space and do not want to see Wright's field become a haven for the homeless, drug	The project would implement a park and open space on the current County land adjacent to Wright's Field. An RMP will be

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	addicts and the criminal element that will be drawn to this area when there are bathroom facilities etc. put in place.	developed prior to formalizing trails and before opening the open space to the public. Activities to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration on the open space as applicable. Through these strategic measures to mitigate impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve. The project would require a live-on volunteer who would live on site. Additionally, ranger patrols would be on site during hours of operation. Maintenance staff would also be required. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I105-3	There will be a considerable amount of traffic that will take place on the 2 lane windy road.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.
I105-4	How does the county propose to pay for all of the above and pay the salaries of the rangers etc.? I feel that this just means that our taxes will be raised to support this endeavor.	The project is funded by County General Funds. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No further response is required and no changes to the RS-Draft EIR are needed.
I105-5	Since this is also in a high risk fire zone, what are the insurance fees going to be on the facilities etc.? That to will amount to a rise in the taxes for those of us that live in Alpine.	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Further detail is also available in the Alpine Park Fire Evacuation Plan Analysis (Appendix K of the RS-Draft EIR). County DPR coordinated with Alpine FPD regarding a long-term fuel modification program with the goal to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage

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		to adjoining properties, provide protection for County DPR/BCLT site development, and ensure safe public refuge at key sites. No changes to the RS-Draft EIR are needed.

Comment Letter I106: Ranucci, Denae, February 27, 2023

Comment#	Comment Text	Response
I106-1	I am writing to comment on the DEIR regarding the Proposed Alpine Park Project. My name is Denae Ranucci and I have lived in the Alpine Community for most of my life. I went to local public schools, played local sports and have enjoyed being a part of the community so much my husband and I bought our home here. I am the mother to two young boys – and as such, find myself in one of the major demographics targeted in this park development. I am opposed to this project as projected and have the following concerns with the DEIR as written:	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I106-2	TRANSPORTATION Would parking in the lot require payment? Parking fees, even minimal ones such as the $3 fee for regional parks like Flinn Springs County Park will be difficult for many families to afford. Two of the goals will not be able to be met if a fee is imposed, they are as listed: 1. Create a place where all Alpine residents can gather and connect as a community. 2. Anticipate, accommodate, and manage a variety of active and passive recreational uses, as well as an open space preserve, that benefit all members of the Alpine community, both now and in the future.	The park will not include parking fees. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The project would include up to 240 parking spaces, although the parking all spaces are not expected to be occupied during typical operation. Should parking overflow occur, County DPR will work with DPW and the San Diego Sheriff's Department to enforce parking regulations, including ticketing or towing any vehicles parked within a no-parking area. It is noted that parking is allowed within the public right-of-way as long as it does not create a safety issue. As the park is constructed, County DPR will continue to monitor parking usage and coordinate with DPW to install "No Parking" signs where appropriate. No changes to the RS-Draft EIR are needed.
I106-3	If fees are imposed, people will need to find free ways to get to the new park. This could mean parking along South Grade. The DEIR specifies that "no parking" signs will be placed there. Who would enforce these no parking signs on South Grade?	Please see the response to comment I106-2 above. Parking fees are not included as part of the project. Also see MR-7 (Transportation and Safety) for additional information on

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		transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.
I106-4	If parking along South Grade is not an option, then community members will try to walk. The only safe way to walk to the park right now, and the shortest route from the center of town, is through the Wright's Field Preserve. What analysis was done to understand what kind of increase in amount of foot/bicycle traffic will be seen through the Wright's Field preserve? How many people coming to the park does the Department of Parks and Recreation (DPR) expect to come to the park from this route? What impacts will this increased traffic have on the preserve?	Please refer to MR-2 (Indirect Impacts on Wright's Field). In addition, an RMP will be developed prior to formalizing trails and before opening the Alpine Park Preserve to the public. In addition, the project would include a DG pathway along the frontage of the park for pedestrian access. A striped crossing across South Grade Road would be included in the all-way stop as an additional safety measure for pedestrians, equestrians, and bicycle users. No changes to the RS-Draft EIR are needed.
I106-5	BIOLOGICAL EFFECTS The section regarding Impacts on Wright's Field is underdeveloped in my opinion. Wright's Field and surrounding areas were used multiple times throughout the DEIR to argue smaller impacts/percentages on habitat loss and sensitive species. Is the county allowed to use surrounding land as part of their argument or lower impact? Even if that land is privately owned? I do know that there are proposals for other local developments, and the continuation of the open space land as it stands is unlikely to remain. The County can only control its owned land. Since the surrounding land is not part of the project scope/county maintained land, why is it included in the overall assessment of habitat loss for sensitive species? (Example: 4.4.4.3: "Impacts on 22.4 acres of native habitats (see Table 4.3-4, below, under Threshold 2) are anticipated from construction of the proposed park. The impacts represent approximately 4.9 percent of the total available open space and conserved lands within the immediate vicinity of the County's parcel. These existing open space and conserved lands include 1) the Wright's Field Preserve; 2) contiguous privately held open space lands, including some with conservation easements; and 3) the proposed preserve lands within the remainder of the County's parcel.")	The impact acreages listed in Table 4.4-3 are presented in the context of the regionally available habitat for the noted species groups in the adjacent Wright's Field Preserve and within privately held, directly contiguous open space lands in the immediate vicinity of the project. Please see **MM-BIO-1** through **MM-BIO-10** in Section 4.4, *Biological Resources*, of the RS-Draft EIR for more information No changes to the RS-Draft EIR are needed.

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I106-6	Impact-BIO-2 Was analysis done to ensure that the leech lines would not result in impacts to the Engelmann Oaks? I understand they are outside the 50-foot root protection zone.	Significant impacts on Engelmann oaks are disclosed in the RS-Draft EIR and mitigation is proposed to reduce those impacts to less-than-significant levels. Although no grading would occur within the canopy of Engelmann oaks, grading may occur outside of the canopy but within 50 feet of oaks within an area termed the "root protection zone." Twenty-five Engelmann oaks are present within areas where grading would occur in a root protection zone. This impact was disclosed as potentially significant, and the County will mitigate through **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures**. No changes to the RS-Draft EIR are needed.
I106-7	Impact- BIO-3: Impact-BIO-3 states "If QCB can no longer be found on either the County's preserve or within the adjacent Wright's Field in a normal flight-year at the end of the 5-year restoration period, the County will secure a specific off-site parcel that will contribute meaningfully to the species' long-term conservation.". Based on the above mitigation, the County is using the Back Country Land Trust's (BCLT) neighboring Wright's Field Preserve as part of the project scope. I believe this should be adjusted to reflect the presence of QCB on the county's owned property itself, especially since most mititagtion efforts are to be focused on that land.	Wright's Field MSCP Preserve is not part of the project but will be used to help assess QCB mitigation success because it is part of the MSCP preserve system and is adjacent to the proposed Alpine Park Preserve. QCBs are present in very low numbers in the County-owned property and Wright's Field vicinity, based on recent focused surveys. This butterfly species is able to fly freely between the two parcels. The observation of QCB on either parcel would result in USFWS considering all host plants as occupied habitat. No changes to the RS-Draft EIR are needed.
I106-8	MM-BIO-9 How will this project support and conform to the implementation of the Habitat Conservation Plan for Regional Butterflies, including the Quinoa Checkerspotted Butterfly, currently in development? The purpose of the Habitat Conservation Plans and Multiple Species Conservation Plans (MSCP) is to maintain large zones of protected space for species, rather than piecemealed lots of protected land. The County has a great opportunity with this Alpine parcel to contribute to the MSCP, but as part of the mitigation efforts, have reported they will be purchasing land and/or credits for the removal of native grassland:	A Low-Effect Habitat Conservation Plan will be prepared for this project as part of the USFWS Section 10 ITP process. Please see **MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat** in Section 4.4, *Biological Resources*, of the RS-Draft EIR for more information on preservation of onsite QCB habitat and QCB mitigation. **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** would provide compensatory habitat-based mitigation with the County's Biological Mitigation Ordinance to mitigate potentially significant impacts on Tier I, Tier II, and Tier III habitats and will be implemented within open space and/or within offsite location(s). No changes to the RS-Draft EIR are needed.

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	MM-BIO-9: Provide Compensatory Habitat-Based Mitigation. To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its BMO to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within open space preserve and/or within offsite location(s). **Table 4.4-5. Mitigation Requirements** Tier[a] | Total Impacts | Mitigation Ratio | Mitigation Requirement | On-site Mitigation[b] | Off-site Mitigation Tier I | 14.86 | 2:1 | 29.73 | 17.48 acres of preservation plus 4.84 acres of restoration (see **MM-BIO-10**) | 7.41 acres of restoration in Wright's Field Preserve (see **MM-BIO-10**) Tier II | 3.97 | 1.5:1 | 5.95 | 5.95 | None Tier III | 3.57 | 1:1 | 3.57 | None | 3.57[b] [a] Tiers correspond to those described in the County's BMO and mitigation sites will meet the criteria for BRCA. [b] Habitat-based mitigation for permanent direct impacts on non-native grassland will be satisfied through purchase of credits and/or land acquisition of a similar high-quality non-native grassland in an off-site location. BCLT is supposed to be preserving Wright's Field in perpetuity and some of the land was already used as mitigation for other projects, is restoration of already preserved land considered a valid substitution for Mitigation as proposed in MM-BIO-9?	
I106-9	It is my opinion that a passive, nature-based park could be used to meet the project goals. It may not include all the of the bells and whistles as listed in the current proposed plan but could create a welcoming and open space for all to gather, while maintaining more of the sensitive habitat and showcase the current natural beauty present. I believe that the current alternatives are not consistent with feedback from the community, nor the best effort to meet project goals with the least environmental impact.	The commenter's preference for a passive park alternative is noted for the record. Alternative 5 – Passive Park Alternative was analyzed in the RS-Draft EIR Chapter 6, *Alternatives*. See MR-10 (Passive Park Alternative) for further details. No changes to the RS-Draft EIR are needed.
I106-10	Thank you for you time and consideration of my input and questions. I appreciate the review of this as the project continues.	These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I107: Ripperger, Ronald, February 26, 2023

Comment#	Comment Text	Response
I107-1	I previously commented on the proposed Alpine Park some time ago in an email to you. As I understand, the public comment period for this proposed Project ends February 28. So, here are some of my thoughts for you to consider:	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I107-2	1. After all I have seen in the Draft EIR I really think the best Project is the No Project option. However, things do change and other ideas can be included as helpful "upgrades" to the land.	Please see response to comment O3-4. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of Alternative 1 – No Project Alternative and its relationship to the project objectives. No changes to the RS-Draft EIR are needed.
I107-3	2. Some improvements to Wright's Field would be a benefit to local folks who use that area for walking or walking their dogs. These improvements could include paths for walking and just like one of the options in the draft document a horse trail. In addition, a rail fence around the property would be nice for aesthetic reasons.	This comment is acknowledged. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. The project would be implementing a park and open space on the current County land adjacent to Wright's Field. No changes to the RS-Draft EIR are needed.
I107-4	3. Like I mentioned in my previous email restrooms will attract the homeless at some point and that won't be a good thing for our community.	Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. A full-time, live-on volunteer, in addition to park ranger patrols during park operation hours, would be present. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I107-5	4. A skate park component, in my opinion, will be noisy and create a noise element that will disturb the local residents. In fact, any activity that will require lighting will then impact area residents along with the additional traffic volume.	Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. Please also see MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the RS-Draft EIR are needed.
I107-6	5. If a park does go forward, in my view it should just include what I mentioned above for paths and fencing along with minor parking and perhaps a picnic area. Once baseball fields go in then you would require night lighting, perhaps more parking, definitely restrooms (would be needed for just a picnic area anyway), etc.	This comment is acknowledged. Please also see MR-13 (Noise and Lighting) for more information on noise and lighting impacts. No changes to the RS-Draft EIR are needed.

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I107-7	6. Final thought is perhaps some hybrid between Option 4 & 5 would be a compromise.	Please see response to comment O3-4. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of Alternative 1 – No Project Alternative and its relationship to the project objectives. No changes to the RS-Draft EIR are needed.

Comment Letter I108: Root, Jody, December 23, 2022

Comment#	Comment Text	Response
I108-1	Thank you for sending the modified sections of the DEIR. I ran an electronic comparison if the modified sections to the original and it is not consistent with what was distributed to the community. I am concerned how fair it is to the Alpine residents who are interested in this project to understand the changes without seeing all the strike-outs and additions. I will share the document with you if that would help. With other projects that I have worked on, when dealing with modified documents, the parties always share all the modifications with the other parties. Look forward to hearing from you.	The County appreciates the comment submitted on the RS-Draft EIR. The County replaced Section 4.4, *Biological Resources*, completely in December 2022 to analyze impacts more fully on special-status species. After the Notice of Availability was issued for the RS-Draft EIR, the County replaced the *Preface*, *Executive Summary*, *Hazards and Hazardous Materials*, *Wildfire*, and *Alternatives* sections to correct minor typographical errors. No new information was presented in these replaced documents. To account for these typographical errors, the County extended the public comment period for the RS-Draft EIR by 14 days for a total review period of 74 days. No changes to the RS-Draft EIR are needed.

Comment Letter I109: Root, Jody, December 27, 2022

Comment#	Comment Text	Response
I109-1	It is all the sections	This comment is acknowledged. Please see the response to the comment I108-1. No changes to the RS-Draft EIR are needed.

Comment Letter I110: Root, Jody, February 28, 2023

Comment#	Comment Text	Response
I110-1	Thank you for extending the comment period on the Recirculated Portion of the DEIR ("RDEIR"). However, I am not	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the

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	sure anymore that our comments are being considered in this process.	Final EIR for the project. No changes to the RS-Draft EIR are needed.
I110-2	I love Alpine. In my over 40 years living here I have been fortunate to be involved many community organizations including AYSO, Bobby-Sox, Kiwanis, Alpine Union School Board, Little League and Alpine School Foundation, to name a few. I think I know Alpine, and its residents, fairly well. I expect more than most of the people working on this Project. The comments on the DEIR, and the other input the County has received from Alpine residents on the Project, is consistently negative and is in line with my assessment of the community's view. The County's Project is just that, the County's and not Alpine's.	This comment is acknowledged for the record. The comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. Please see MR-11 (Public Outreach) for additional information regarding public outreach. No changes to the RS-Draft EIR are needed.
I110-3	The failure to address many of the issues that were raised in the comments to the DEIR in the RDEIR, and the County's attempt to bolster its position by including an Alternative that was created just to reject the passive park concept is deceptive, at best. A number of Alpine residents have offered to sit down with the County to discuss true alternatives to the Project, but that has not occurred. If that happened an Alpine Park that is consistent with the natural environment of its location could be created that meet most, if not all, of the objectives outlined in the DEIR. Why, if the County is trying to build a park for Alpine, won't it sit down in a true working group format and create a proper Alpine Park. Alternative 5 is embarrassing!	Please refer to MR-11 (Public Outreach) for more information on the County's public meetings and the public outreach efforts and MR-10 (Passive Park Alternative). Please also refer to the response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives. No changes to the RS-Draft EIR are needed.
I110-4	In addressing need for a park, the DEIR and RDEIR does not mention the various "County" initiatives that will decrease the population in unincorporated areas, including Alpine. The new Regional Plan shows a decrease population in Alpine in the future. In addition, there is an effort to limit development in unincorporated areas due to pollution and other environmental reasons, further reducing growth, not the 61% increase in population for central Alpine mentioned in the DEIR and RDEIR.	Please see the response to comment I80-8 for why the Draft EIR utilized SANDAG Series 13. The PMP found the Alpine CPA to have a deficit of local parkland. See MR-12 (Parks Master Plan) for more details related to the need for park facilities. No changes to the RS-Draft EIR are needed.
I110-5	I hope the County is aware its lack of attention to input from Alpine residents will lead to continued opposition. I just do not understand why the County does not act reasonably to achieve a winning scenario.	Please see MR-12 (Parks Master Plan) for information about park needs in the Alpine community. Please refer to MR-11 (Public Outreach) for more information regarding public

Comment#	Comment Text	Response
		meetings and the public outreach efforts in relation to the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter I111: Scriber, Michael, January 13, 2023

Comment#	Comment Text	Response
I111-1	Thank you for the maps. It is very difficult to know which is the best alternative without the details of how the areas will be mapped out. It is my understanding that Alternative 3 has the parking pulled away from the road, but I can't tell that in the maps. I think that is a good idea, from a safety point of view. I like Alternative 3 and 4, but I can't pick between them without the details.	The County appreciates the comment submitted on the RS-Draft EIR. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I111a: Scriber, Michael (Voicemail), January 13, 2023

Comment#	Comment Text	Response
I111a-1	I was reading through the Alpine Park Project and I just have one comment about the summary. If you could call me back that would be great.	This comment is a transcribed voicemail received by the County regarding the RS-Draft EIR. The County spoke to Michael Scriber over the phone and followed up by email as noted in the responses to comments I112-1, I113-1, and I114-1, below. No changes to the RS-Draft EIR are needed.

Comment Letter I112: Scriber, Michael, February 2, 2023

Comment#	Comment Text	Response
I112-1	Do you have layouts for the alternatives for the Alpine park? These would be really helpful to understand these different alternatives.	The County appreciates the comment submitted on the RS-Draft EIR. Each of the alternatives discussed in the RS-Draft EIR are developed at a conceptual level but not into a fully developed plan. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I113: Scriber, Michael, February 8, 2023

Comment#	Comment Text	Response
I113-1	I'm sure that it would take a lot of work to fully design each alternative. What I think would be useful for the public is a rough sketch of the options, so that they can better be understood. Are these alternatives going to be voted on? I think that some of them are really good ideas that may be to what the community is looking for.	The County appreciates the comment submitted on the RS-Draft EIR. Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives. The final decision on the project or alternative that would ultimately be implemented falls upon the County Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment Letter I114: Scriber, Michael, February 13, 2023

Comment#	Comment Text	Response
I114-1	Thank you for clarifying my confusion, Emily. I thought that the alternatives were still on the table. That is unfortunate, because I get the impression that people would prefer one of the alternatives.	The County appreciates the comment submitted on the RS-Draft EIR. Please see the response to comment I113-1, above. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I115: Simper, Julie, February 7, 2023

Comment#	Comment Text	Response
I115-1	Attached, please find my public commentary regarding the Alpine County Park DEIR Recirculation. Thank you for your time, consideration, and for keeping me informed of all communications and developments related to the proposed Alpine County Park project.	The County appreciates the comments submitted on the RS-Draft EIR. This is an introductory comment to more in-depth, comments later in the letter. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I115-2	As a community member living in Alpine for over 12 years, I want to thank you for the opportunity to comment on the Alpine County Park Project's ("Project") Draft Environmental Impact Report (DEIR) Recirculation. I respectfully submit the following for consideration and response.	This comment is noted for the record. No changes to the RS-Draft EIR are needed.
I115-3	**Project Alternative: A Nature-Based Park**	This comment expressing opposition to the project is noted for the record. Please also see MR-11 (Public Outreach) for

Comment#	Comment Text	Response
	The proposed 25-acre park plan goes far beyond the 12-15-acre community park concept originally presented to local residents. We expected a park more aligned with the natural and rural location. The County of San Diego Department of Parks and Recreation (DPR) acknowledges this discord when it states in its Frequently Asked Questions document: "Early conversations about the search for a park in Alpine may have referenced smaller acreage, however, the purchase of the 98-acre parcel made it possible to expand acreage opportunities for both active and passive uses." This unjustified increase has taken much of the community by surprise and is a fundamental source of dissatisfaction and distrust. The community was also led to believe by local leadership that the park would be smaller and more nature-based. To illustrate, Back Country Land Trust board member and Alpine Community Planning Group Member George Barnett stated in 2019: "My understanding is that the County will also plan on passive uses, that is – no active sports playing fields. Maybe there'll be picnic places, a pavilion, a kiddie playground, or things of that nature that town's people want." The currently proposed 25-acre park design was released late summer 2020. The size and scope were a surprise and shock to most of the community who were expecting, and generally in support of, a significantly smaller park. As a result of the unexpected scope of the currently proposed Alpine County Park, as awareness of the design increases, so does the opposition.	additional information regarding public outreach. No changes to the RS-Draft EIR are needed.
I115-4	Under Chapter 6, Alternatives, the DEIR now outlines how the DPR considered other alternatives to the proposed park: a no project alternative, an even larger sports complex option, two other slight variations on the current active 25-acre project, and now a passive park alternative. Of these alternatives, the option that best aligns with the nature-based park as initially presented and generally supported by the community is the passive park alternative. Furthermore, the results of the DPR public outreach reveal that a nature-based park is precisely what the community has	The commenter's preference for the Passive Park Alternative is noted for the record. Please refer to MR-11 (Public Outreach) for additional details related to the County's outreach efforts with the Alpine community. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	requested: "… the top five activities the responders selected were walking/jogging, riding a mountain bike on a trail/in a park, nature, dog park, and picnicking. The 5 activities with the fewest votes were swimming pool, football, softball, bocce ball, and tennis/pickleball. The top five elements chosen from the questionnaire were natural areas, restrooms, sidewalks and trails, shade trees, and drinking fountains. The least preferred elements were court and field lighting. The top five elements selected from the image boards were multi-use trails, bike park, dog park, nature-based play, and picnic shelter. The least favored were horseshoe pits, table tennis, tennis, softball, and youth football." Clearly, the Alpine community strongly prefers nature-based activities over sports-facilities. Additional support for building a passive, nature-based park instead of an extensive 25-acre sports park is that the abutting Joan MacQueen Middle School is planned for major renovation of its existing and extensive sports facilities. Once again, Back Country Land Trust board member and Alpine Community Planning Group member George Barnett stated: "Plansto refurbish La Crosse, soccer and softball fields at abutting Joan MacQueen Middle School, plans that include a football field, render surplus such facilities at a community park." We agree.	
I115-5	Based on all of the above, we therefore ask: • Given this significant qualitative and quantitative data and input, including lack of population growth as proven by the recent census, how can DPR justify the design of the proposed 25-acre park with extensive sports facilities as meeting a local Alpine need? • Isn't the passive park option the best in that it minimizes the impact on the environment and rural setting, provides appropriate recreational activities that respect and complement the Wright's Field Ecological Preserve, and protects the preserve from habitat destruction due to fragmentation, encroachment, and overflow use from a park?	Please refer to MR-12 (Parks Master Plan) for details related to the need for the proposed park. Please also refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I115-6	**Inadequate and Biased Public Outreach** The proposed park design was released to the public late summer 2020. Since then, the County has extended many requests for public comment as part of the official planning process. In response, a significant proportion of Alpine community members have responded with thousands of commentaries; the majority of which express critical questions and concerns regarding the proposed park design. In fact, when analyzing the public records of these official meetings and calls for comment, approximately 65% have expressed concerns/questions and only 35% have voiced support. These concerns have been categorically dismissed by local and County public representatives and are not represented in the County of Parks and Recreation public outreach data. Despite this strong and disproportionate showing of opposition, the DPR omits any mention of concern from its reporting on the meeting. Its public outreach summary states: "A conceptual park design was shared with the attendees after which a question-and-answer period took place. The meeting was scheduled from 7:00 PM to 8:30PM and several questions from the attendees were asked and answered before the meeting time had ended. The questions that were left unanswered during the meeting, were answered following the meeting and then posted online at the Department of Parks & Recreation, Alpine Park web page." This descriptions whitewashes and misrepresents the overwhelming public comment which did not support the proposed design. View details and analysis of the public outreach and community concerns here.	This comment is acknowledged. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. No changes to the RS-Draft EIR are needed.
I115-7	Given that the strong public comments of concern/opposition were categorically dismissed by the County, one must therefore ask: • Why are there public calls for comment during the planning process if the majority of commentary will simply be ignored? • Why are the increasing community concerns not being taken into consideration?	Please see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	• How can the Department of Parks and Recreation state it is designing a park for the Alpine community when it ignores the input provided by a significant/majority number of Alpine residents?	
I115-8	**Inexistant and Unsafe Non-Automotive Access to the Park Site** There are no continuous bike/pedestrian pathways or public transportation directly servicing the proposed park location. As stated on page 4.17-2 under "4.17.2.1 Existing Transportation Conditions" the closest bus stop is approximately 0.88 miles north of the project site". The DEIR goes on to state that "There are no bike facilities along South Grade Road adjacent to the project site." The DEIR also acknowledges that along South Grade Road there currently are no sidewalks or other pedestrian facilities. The sidewalk to be included along the park perimeter will not connect to any of the existing pathways or public transportation leading to other parts of Alpine; most importantly, to the inhabited town center.	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.
I115-9	Therefore, serious questions and concerns are as follows. • The DPR calls the project a "drive to" park and has repeated that the only recommended non-automotive access is via Wright's Field. Why does the DEIR not address this major gap in the park design and provide solutions to address the lack of safe and appropriate access for those on foot or other non-vehicular modes of transportation? • If the park closes at dusk and the Alpine town center is 1-2 miles away on foot, how can the rugged trails with no lighting in Wright's Field be considered safe and appropriate access before the sun comes up and/or once the sun goes down? • How will non-vehicular access via the dangerous South Grade Road be controlled and/or discouraged? • If only accessible via automobile, dangerous roadways, or rocky/uneven/unlit trails, how does the park location promote equitable access for all?	Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. No changes to the RS-Draft EIR are needed.

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I115-10	**Insufficient Analysis of Impact to Wright's Field Multiple Species Conservation Plan** In 2003, the Back Country Land Trust (BCLT) and the County of San Diego County Department of Parks and Recreation (DPR) submitted an application to the Environmental Enhancement and Mitigation Program (EEMP) to obtain funds to purchase the remaining 142-acre land as Phase IV of the Wright's Field Multiple Species Conservation Plan (MSCP). These efforts were unsuccessful and the majority of this land is now owned by the County as the location being considered for the proposed Alpine County Park. View application, including map on page 39, here.	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I115-11	In the application, the BCLT and DPR state: • The acquisition of this land "is critical to the biological and physical integrity of this MSCP preserve. The Phase IV parcel is entirely comprised of native grassland, coastal sage scrub, Engelmann oak woodland, and vernal pool habitats." (Page 7 of the application) • In addition, the application also addresses sensitive habitats on this land and on Wright's Field MSCP and how the "viability of species within them is increased when they are protected together in an integrated whole". It further outlines how critical this land is as a wildlife corridor. This entire document describes how important this parcel of land is to the integrity of the adjacent Wright's Field MSCP and the surrounding natural environment/ecosystem.	The comment does not raise specific issues related to the analysis of environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I115-12	Therefore, I submit for consideration and response, the following. • How is it reasonable/acceptable that both the BCLT and DPR now claim the opposite and state that the 25-acre park will not impact Wright's Field MSCP? • How many people will access the park via these trails? • Where are the thorough studies of the impacts to Wright's Field in the DEIR?	The commenter poses questions regarding the analysis of impacts on Wright's Field MSCP Preserve. Please see MR-2 (Indirect Impacts on Wright's Field) regarding indirect effects on Wright's Field. The RS-Draft EIR identifies potentially significant impacts on sensitive biological resources, including indirect effects on the adjacent Wright's Field, and provides mitigation to reduce those effects to less-than-significant levels, following guidance in CEQA and within the County Guidelines for Determining Significance. **MM-BIO-1** through **MM-BIO-9 and** APM-BIO-1 would reduce the project's impacts on any species identified as a candidate, sensitive, or special-status

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	• What are the biological impacts on Wright's Field Ecological Preserve from fragmentation, encroachment, and overflow use from a large active park? • How will this be appropriately mitigated considering that Wright's Field MSCP is recognized as a unique resource in San Diego County?	species in local or regional plans, policies, or regulations or by CDFW or USFWS to a less-than-significant level. In comments I115-10 and I115-11, the commenter refers to a 2003 grant application prepared by BCLT and the County that includes a discussion of "Phase IV" of the Wright's Field project. The Phase IV boundaries include the currently owned County parcel, plus a 40-acre privately held parcel at the southwest corner of Wright's Field, which is still privately held at present. When the Phase IV parcel was described as a wildlife corridor, it included this privately held parcel, which would indeed provide a key access point along Chocolate Creek to points west of Wright's Field. But that parcel was not acquired by County DPR and is not part of the project. Furthermore, additional residential development has occurred since the 2003 grant application that substantively changed how wildlife can move to the north and east of the County parcel. Specifically, three large houses to the north of the County parcel along Engelmann Oak Lane were built after the 2003 grant application; they further restrict movement of terrestrial mammals to the north. Two additional homes east of the intersection of South Grade and Boulder Oak Lane were also built after the 2003 grant application was prepared. Those homes constrain wildlife movement from the far northeastern corner of the County parcel to points farther east. No changes to the RS-Draft EIR are needed.
I115-13	**In Conclusion** Based on the data and the information included in the DEIR, I am simply not convinced that the proposed 25-acre park is what is best for the community, the natural location, or what the majority of local residents want/need. Not only are existing recreational facilities in Alpine underutilized and not properly maintained, but available County survey data does not support inclusion of many of the facilities in the current plans. Therefore, Alternative 5 of a Passive Park is the option that best meets the larger community's expectations and expressed needs.	The commenter's preference for Alternative 5 – Passive Park Alternative is noted for the record. The County appreciates Julie Simper for submitting comments on the RS-Draft EIR. These comments will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	Thank you for your time, consideration, and for keeping me informed of all communications and developments related to the proposed Alpine County Park project.	

Comment Letter I116: Smith, Mary, February 14, 2023

Comment#	Comment Text	Response
I116-1	Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report. (DEIR) I have been a resident of Alpine for 38 years and my husband since 1960. We have experienced all the changes of Alpine through 60+years. We have raised 3 children in Alpine, have been a part of the community through many sports, schools and attending an Alpine church. Even our children are choosing to live and raise their children in Alpine. Living in Alpine provides a person, couple or family with a clear and clean environment. We are away from the local cities and combustion of crowds and traffic by choice. This is a major reason why people move to Alpine. Wright's Field has been a topic of many discussions through the years on how to protect and preserve the natural land mass including the adjacent land areas. Due to the town's commitment the land area was deemed a preserve. My preference for the use of this land; ALTERNATIVE 5 Passive Park Alternative.	The County appreciates the comments submitted on the RS-Draft EIR. The commenter's preference for Alternative 5 – Passive Park Alternative is noted for the record. The project would be implementing a park and open space on the current County land adjacent to Wright's Field. An RMP will be developed prior to formalizing trails and before opening the open space to the public. The RMP will include long-term management and monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space. See MR-4, Natural Resource Mitigation, for additional information. Moreover, the County has proposed additional signage, a live-on volunteer, and a park ranger to monitor the Alpine Park Preserve and Alpine Park, as well as a formalized staging area for parking, which would minimize impacts on these special-status species from unauthorized activities (e.g., off-trail trampling, building of jumps/berms within the trails, parking in unauthorized areas). No changes to the RS-Draft EIR are needed.
I116-2	**Regional park description:** Is an area of land, preserved on account of its natural beauty, historic interest, recreational use, or other reason. The ("other reason") would be to protect Wrights Field with this adjacent land. Under alternatives 2, 3 and 4 " Any Sport Complex" will destroy the use and beauty of Wrights Field; not to mention the wildlife and natural environment. Also, the need to address the noise	The project and Alternative 2, Alternative 3, and Alternative 4 would be compatible with the objective of providing for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the open space portion of the property. The project and Alternative 2, Alternative 3, and Alternative 4 would have a live-on volunteer living on site as well as park rangers patrolling the area daily for both the park and open space. The project and Alternative 2, Alternative 3, and Alternative 4 would have designated trails with trash cans that would be

Comment#	Comment Text	Response
	pollution, air pollution of potentially 1000 people gathering in an already developed area? The fire danger alone is frightening. How will we evacuate our homes with a 1000 visitors in a ("Sports Complex")? South Grade is the interior roadway to and from Albertsons, schools and to town. The traffic congestion will be miserable, this is only a 2 lane road that can not be extended. (Alternative 2, 3 and 4 Parks) of this size needs to be easily accessible on and off the freeway, and on a main road. Has the Parks and Recreation Dept. approached Grossmont Unified School District to incorporate a ("Community Sport Complex") with the future Alpine High School on Alpine Blvd.? (A better suited location for a ("Community Sport Complex") Parks and Recreation have a responsibility to the taxpayers of Alpine to protect their citizens. This park will not be safe for children to travel to and from by themselves on South Grade Rd. The complications are numerous and the costs are numerous! We need to keep Alpine clean and not polluted by fumes and noise pollution. My preference for the use of this land; ALTERNATIVE 5 Passive Park Alternative. Alternative 5: will enhance the beauty of Wrights Field and will be more welcoming to the Community and its visitors.	emptied daily to prevent trash from accumulating; therefore, staff members would be on site daily. The designated parking area of the project and Alternative 2, Alternative 3, and Alternative 4, with staff on site, would prevent the public from parking within sensitive habitat and thereby potentially negatively affecting natural and cultural resources. In addition, the project and Alternative 2, Alternative 3, and Alternative 4 would include native grassland restoration that would benefit QCB habitat through the removal of nonnative invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field. The project and Alternative 2, Alternative 3, and Alternative 4 would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine. The project and Alternative 2, Alternative 3, and Alternative 4 would provide a four-way stop to slow down traffic on South Grade Road, in addition to adding crosswalks and a walking path for the public. Please refer to MR-9 (Wildfire) for information concerning wildfire factors, response, evacuation, and other sufficient controls that would be in place to-reduce wildfire risks. Please also refer to Section 4.20, *Wildfire*, and Section 4.9, *Hazards and Hazardous Materials*, of the RS-Draft EIR, and the FEOA included as Appendix J of the RS-Draft EIR. Please also refer to the Alpine Park Fire Evacuation Analysis prepared by Chen Ryan Associates. This analysis assessed the time required for evacuation from the project site under several scenarios (e.g., a wind-driven fire that results in a required evacuation, affecting the project site and surrounding community). For a conservative scenario, the analysis assumes that all the households, businesses, and vehicles would leave together once an evacuation order is issued. Specifically, the evacuation analysis assumes that up to 240 vehicles would evacuate from the project site. This assumption represents full occupancy of the project site. The analysis also assumes that up to 4,029 vehicles and 4,432 vehicles would evacuate the

Comment#	Comment Text	Response
		surrounding land uses under the existing and cumulative scenarios, respectively. Please see MR-7 (Transportation and Safety) for additional information on transportation impacts, roadway operation and safety, and project access. The commenter's preference for Alternative 5 – Passive Park Alternative is noted for the record. The County appreciates Mary Smith for submitting comments on the RS-Draft EIR. These comments will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment Letter I117: Smith, Ron, February 14, 2023

Comment#	Comment Text	Response
I117-1	My name is Ron Smith. I am a Alpine resident and have been since 1960. I live at 2202 Rancho Summit Alpine Ca. I am also a licensed contractor. I have reviewed the EIR for the proposed Alpine park. I have the following questions, concerns and comments.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I117-2	Greenhouse gases, emissions and climate change. Parking lot to have 250 to 275 parking spaces. That means potentially 275 vehicles driving long distance to a remote park if alternate #2,#3 or #4 are built. Why is such a large regional park being considered in a remote town? Won't that many vehicles driving a long distance, add to greenhouse gases?	The project includes an active park for local recreational use in approximately 25 acres of the site, and open space that would span approximately 72 acres of the remaining project site. The onsite parking lot will include up to 240 parking space. The project's daily trips were provided in the Transportation Impact Study (Appendix I of the Draft EIR). CalEEMod defaults were used for the trip distances. As shown in Appendix B of the Transportation Impact Study (PDF page 110), these distances vary from 9.5 miles to 7.3 miles, with diverted, primary, or pass-by trips. Please also refer to MR-8 (Greenhouse Gases and Energy). No changes to the RS-Draft EIR are needed.
I117-3	Utilities and service systems. Project description, overview states for utilities, the project proposes to connect to existing sewer system, or including a septic system to serve restrooms. I did not find in the report a section that addresses the add strain this would put on the existing sewer system. Would a septic	Please refer to Section 4.19 *Utilities and Service Systems*, of the Draft EIR for information on the septic system to serve the facilities and wastewater treatment. The project wastewater facility would not have a significant impact on groundwater resources. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	system have any effect on the groundwater? Is the EIR incomplete if it did not properly address, sewage, disposal?	
I117-4	In closing please consider going with the most environmentally sensitive alternates, #1 or #5. A passive park would fit best in a rural small town like Alpine. Thanks for listening.	The commenter's preference for retaining a passive park use for the project site is noted for the record. Please also refer to MR-10 (Passive Park Alternative) for more information regarding a passive park alternative. No changes to the RS-Draft EIR are needed.

Comment Letter I118: Smith-Ward, Lori, February 2, 2023

Comment#	Comment Text	Response
I118-1	Alpine does NOT need this park. Leave the open space land alone. Just another way to destroy our beautiful Alpine. This is a total waste of tax payer money. Alpine does NOT need the extra traffic and influx of people who don't respect our area and lifestyle.	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I119: Stanko, Allen, February 24, 2023

Comment#	Comment Text	Response
I119-1	I am opposed to the plan for the new county park in Alpine. I'm sure my opinion doesn't really matter, but here goes anyway. A new park in Alpine will just attract homeless people. And I think that's why you're just going ahead with your plans to build the park. Once the park is built and the homeless start taking it over, that will alleviate some of homelessness in other parts of San Diego. You are trying to ruin the character of Alpine. You are trying to make Alpine's park just like Well's Park in El Commode. Alpine is a beautiful place to live... for now at least anyway ! We don't need your stinking park idea !	The County appreciates the comment submitted on the RS-Draft EIR. The commenter's opposition to the project is noted for the record. An RMP will be developed prior to formalizing trails and before opening the open space to the public. Moreover, the County has proposed additional signage, a live-on volunteer, and a park ranger to monitor the Alpine Park Preserve and Alpine Park, as well as a formalized staging area for parking, which would minimize impacts on these special-status species from unauthorized activities (e.g., off-trail trampling, building of jumps/berms within the trails, parking in unauthorized areas). This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment Letter I120: Stout, Yolaine, February 28, 2023

Comment#	Comment Text	Response
I120-1	Thank you for the opportunity to respond to the recirculated draft EIR for the Alpine County Park Project. In addition to the comments I sent to the original draft EIR on November 13, 2021, (attached) I have the following concerns and questions.	The County appreciates the comments submitted on the RS-Draft EIR. This is an introductory comment to more in-depth comments later in the letter. The commenter included a copy of the comment letter submitted for the Draft EIR, which the County responded to in the Final EIR and does not constitute new substantive comments on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. The commenter's opposition to the project is noted for the record. No changes to the RS-Draft EIR are needed.
I120-2	**Section 4.4 Biological Resources:** Page 4.4-47 MM-BIO-10: Native Grassland Mitigation In Table 4.4-5. Mitigation Requirements Table, Tier I habitats (Engelmann oak woodland and Valley needle grassland) appear to be combined in the amount of 14.86 acres, yet in the paragraph below **"**MM-BIO-10: Native Grassland Mitigation," 6.88 acres of open Engelmann Oak woodland is to be used as part of the 2:1 mitigation ratio for the native grassland. We have estimated that the total amount of grassland alone to be impacted by the park portion of the project is conservatively 18 acres – meaning a minimum of 36 acres needs to be mitigated. In addition, 6.88 acres of open Engelmann Oak woodland would require their own mitigation. Even if one uses the RC DEIR 14.86 acres figure, insufficient grassland exists onsite to mitigate at a 2.1 ratio. The RC DEIR is then using offsite restoration of native grasslands to make up the difference.	Mitigation for native grasslands was revised in the RS-Draft EIR in consultation between the County and the wildlife agencies (CDFW and USFWS). See MR-3 (Native Grassland Impacts) for additional details. No changes to the RS-Draft EIR are needed.
I120-3	It is glaringly clear that not only is Valley Needle Grassland a Tier 1 highly endangered habitat, it is rare enough that no equal or better quality grassland exists that is adequate for mitigation. With this form of "mitigation," the Valley Needle Grassland is dying a death of a thousand cuts. This is not mitigation, it is manipulating numbers to enable destruction. The soils that support this grassland, once removed is permanent. No amount of "restoration" can replace the soils necessary to support a grassland and all of its great variety of accompanying species.	Mitigation for native grasslands was revised in the RS-Draft EIR in consultation between the County and the wildlife agencies (CDFW and USFWS). See MR-3 (Native Grassland Impacts) and **MM-BIO-10: Native Grassland Mitigation**, which includes Valley needlegrass grassland restoration, for additional details. For additional information and an analysis of a range of reasonable alternatives, please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a full discussion of the alternatives

Comment#	Comment Text	Response
	Why are the "no project" or "passive park project" alternatives not being utilized instead?	considered but rejected. No further response is required. No changes to the RS-Draft EIR are needed.
I120-4	Offsite mitigation is proposed in the form of native grassland restoration on the Wright's Field Preserve owned by the Back Country Land Trust. According to CEQA "15070(a)(1) of the CEQA Guidelines: Mitigation measures must be enforceable through permit conditions, agreements, or other legally- binding instruments. Mitigation measures must be designed to achieve the greatest extent feasible of the objectives of the environmental resource that is being impacted."	Please see response to comment I120-2 regarding mitigation for native grasslands. See MR-3 (Native Grassland Impacts) for additional details. No changes to the RS-Draft EIR are needed.
I120-5	What assurances does the public have that there is an existing, enforceable, measurable and ongoing contract between the Back Country Land Trust and the County of San Diego? Who will oversee and be legally responsible for the restoration? BCLT or the County? Is there an existing signed and written agreement? Why isn't this included in the draft EIR? What happens if BCLT fails to uphold its end of the agreement? Who determines exactly where on Wright's Field and how the restoration will occur? It has been determined (see article below) that the needle grasses on Wright's Field are genetically UNIQUE with a variety of differentiating alleles. Who will gather seeds from Wright's Field to be used for propagation, assuming this will be done? Exactly what type of restoration will be used? Will the public be able to monitor the process and the progress? The following is an article showing the unique nature of Wright's Field purple needlegrass – (indicated as "J" on these tables. Knapp, E.E. and Rice, K.J. (1998), Comparison of Isozymes and Quantitative Traits for Evaluating Patterns of Genetic Variation in Purple Needlegrass (Nassella pulchra). Conservation Biology, 12: 1031-1041. https://doi.org/10.1046/j.1523-1739.1998.97123.x Table 1. Location, location code, county, and elevation of the sites from which N. pulchra populations were sampled in California.	Please see the Mitigation Monitoring and Reporting Program (EIR Attachment 1) that lists the responsible parties for the implementation, monitoring and reporting, and verification of the implementation of the environmental mitigation measures required by the Final EIR for the project. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	Location of population (code) — *County* — *Elevation (m)* — *Weather station location*[a] Dye Creek Preserve (A) — Tehama — 160 — Red Bluff (7292) Parrott Ranch (B) — Butte — 33 — Chico (1715) Cosumnes Preserve (C) — Sacramento — 6 — Lodi (5032) Jepson Prairie Preserve (D) — Solano — 6 — Fairfield (2934) Ring Mountain Preserve (E) — Marin — 170 — Kentfield (4500) Pecho Coast Trail (F) — San Luis Obispo — 75 — Pismo Beach (6943) Vandenberg Air Force Base (G) — Santa Barbara — 50 — Lompoc (5064) Santa Rosa Plateau Preserve (H) — Riverside — 550 — Vista (9378), Elsinore (2805)[b] Camp Pendelton Marine Base (I) — San Diego — 25 — Vista (9378) Alpine (Wright's field) (J) — San Diego — 595 — Alpine (136) [a]*Location of the nearest National Oceanic and Atmospheric Administration weather station from which climatic variables at each site were estimated. Station number is in parentheses.* [b]*Average of Vista and Elsinore values was used, except that 10 cm was added to the annual precipitation estimate (R. Wills, personal communication).* Table 3. Summary of banding phenotype frequencies for eight polymorphic stains in the 10 N. pulchra populations evaluated.* *Stain* — *Banding phenotype* — *Population* A B C D E F G H I J AAT 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 0.69 0.88 2 — — — — — — — — 0.31 — 3 — — — — — — — — — 0.12 ACP 1 1.00 0.16 1.00 1.00 1.00 1.00 0.93 0.98 1.00 1.00 2 — — — — — — 0.07 0.02 — — 3–10 — 0.84 — — — — — — — — ADH 1 — — — — — 0.45 0.81 0.89 1.00 0.89 2 — — — — 0.87 — — — — — 3 1.00 0.74 0.15 0.53 0.13 0.10 — — — — 4 — 0.26 0.53 0.47 — 0.45 0.19 — — — 5 — — — — — — — 0.11 — 0.11 6–7 — — 0.32 — — — — — — — MNR 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 0.91 1.00 1.00 2 — — — — — — — 0.09 — — PGD 1 1.00 1.00 1.00 0.97 1.00 1.00 0.97 0.94 1.00 0.85 2 — — — 0.03 — — 0.03 0.06 — 0.15 PGI 1 0.75 0.56 0.63 0.10 0.42 0.55 — 1.00 0.49 0.96 2 0.25 0.44 0.35 0.82 0.58 0.35 — — — — 3 — — 0.02 0.08 — 0.10 — — — — 4–5 — — — — — — 0.06 — — — 6–8 — — — — — — 0.94 — — — 9–10 — — — — — — — — 0.51 — 11 — — — — — — — — — 0.04 PGM 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 0.94 1.00 2 — — — — — — — — 0.06 — TPI 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 0.94 1.00 2 — — — — — — — — 0.06 — Plants scored (mean) 57.0 52.9 52.9 39.6 53.0 28.9 36.0 47.9 32.4 25.5 Polymorphic stains (%) 9.1 27.3 18.2 27.3 18.2 18.2 36.4 36.4 36.4 36.4 Phenotypes/stain (mean) 1.09 1.91 1.45 1.36 1.18 1.36 1.64 1.45 1.45 1.36 *Mean number of individuals scored, percentage of enzyme systems that were polymorphic, and mean number of banding phenotypes per enzyme system are given in the last three rows.	
I120-6	In Section 7(a)(1) of the Endangered Species Act (ESA) of 1973, federal agencies are required to "utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this Act." The section further requires that these programs include specific provisions for the development and implementation of conservation plans.	This comment does not identify specific environmental impacts or address the adequacy or accuracy of the EIR. No further response is necessary. No changes to the RS-Draft EIR are needed.
I120-7	In addition, the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS) have jointly issued guidelines for the development of conservation plans under the	Long-term management of the open space would occur as part of the County's commitments as a signatory to the MSCP; as required under the County's MSCP Subarea Plan, an RMP will be

Comment#	Comment Text	Response
	ESA. These guidelines emphasize the importance of establishing clear and measurable goals and objectives for the conservation plan. The guidelines state that "the purpose of the conservation plan is to provide a clear and concise statement of the proposed conservation measures that will minimize the impacts of the proposed action and ensure the survival and recovery of the species." No such goals and objectives are provided for the restoration of offsite native grasslands in this RC DEIR, therefore the public and interested agencies cannot evaluate its effectiveness, which is the purpose of an EIR. Therefore, the DEIR is inadequate.	developed prior to formalizing trails and before opening the open space to the public. Alpine Park Preserve will be managed in perpetuity in accordance with an RMP that will outline management activities to be carried out by the County. The activities to be included in the RMP are long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space, as applicable. See MR-4, Natural Resource Mitigation, for additional details. Mitigation measures presented in the Draft EIR have been revised to clarify that the County would provide compensatory mitigation and habitat restoration, as well as monitoring regardless of the status of the ITP. No changes to the RS-Draft EIR are needed.
I120-8	**Chapter 6: Alternatives** 6.4.2.5 Alternative 5 – Passive Park Alternative While I appreciate the inclusion of a Passive Park Alternative in this new draft portion of the EIR, it is wholly inadequate in that it does not consider the most common and desired amenities of a passive park. The RC DEIR states, “No restrooms or similar facilities that would require a higher level of on-site maintenance and ranger presence would be developed, but there would be a kiosk and a bench in a disturbed area at the trail head.” Seriously? The chosen active park concept requires a much higher level of maintenance and ranger presence. So, on the one hand, the passive park is rejected because restrooms would require onsite maintenance, but the preferred alternative has both restrooms and onsite maintenance?	The project site consists of rural land with vegetation and existing trails. Please refer to MR-10 (Passive Park Alternative) for more information regarding the Passive Park Alternative included in Chapter 6, *Alternatives*, of the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I120-9	The Passive Park Alternative is described in the most minimal terms – trails (existing), a kiosk and a single bench – as if a kiosk and a bench are the only passive park possibilities. This is egregiously inadequate. Why is the County Parks and Recreation ignoring the wishes of the greater Alpine community in regards to what THEY wish to see? Why is it listening to handful of self-interested individuals who serve special interest groups? The greater Alpine	Please see response comment to I20-8. No changes to the RS-Draft EIR are needed.

<table>
<tr><th>Comment#</th><th>Comment Text</th><th>Response</th></tr>
<tr><td></td><td>community wants something far simpler, cheaper and less environmentally destructive than the current “preferred” boondoggle.</td><td></td></tr>
<tr><td>I120-10</td><td>From September 2017 to April 2018, A Park 4 Alpine conducted a survey of 494 Alpine residents as to their wishes for park amenities without regard to location.
By far, the most desired amenities were PASSIVE in nature – which was actually a surprise to all of the organizers.
The following table is a summary of the results.
Combined positive responses: Would very much like to see/ One of my top choices/ My absolute top choice
<table>
<tr><td>1</td><td>Lots of shaded areas</td><td>91.22%</td></tr>
<tr><td>2</td><td>Park benches</td><td>83.42%</td></tr>
<tr><td>3</td><td>Picnic areas</td><td>80.93%</td></tr>
<tr><td>4</td><td>Dog park</td><td>72.41%</td></tr>
<tr><td>5</td><td>Bike path and stands</td><td>68.45%</td></tr>
<tr><td>6</td><td>Trailhead for hiking, biking or horseback riding</td><td>67.92%</td></tr>
<tr><td>7</td><td>Parcourse (a guided trail with stops for outdoor exercising).</td><td>64.96%</td></tr>
<tr><td>8</td><td>Larger playground</td><td>63.54%</td></tr>
<tr><td>9</td><td>Pavilion, gazebo</td><td>62.53%</td></tr>
<tr><td>10</td><td>Barbecue areas</td><td>59.40%</td></tr>
<tr><td>11</td><td>Amphitheater</td><td>44.62%</td></tr>
<tr><td>12</td><td>Bocci ball, horse shoes, shuffle board</td><td>41.32%</td></tr>
<tr><td>13</td><td>Swimming pool</td><td>39.90%</td></tr>
<tr><td>14</td><td>Soccer fields</td><td>37.91%</td></tr>
<tr><td>15</td><td>Softball/baseball fields</td><td>37.02%</td></tr>
<tr><td>16</td><td>Frisbee area</td><td>35.17%</td></tr>
<tr><td>17</td><td>Skateboard park</td><td>34.89%</td></tr>
<tr><td>18</td><td>Basketball fields</td><td>34.87%</td></tr>
<tr><td>19</td><td>Gymnasium</td><td>31.20%</td></tr>
<tr><td>20</td><td>Tennis courts</td><td>31.12%</td></tr>
<tr><td>21</td><td>Volleyball courts</td><td>29.17%</td></tr>
<tr><td>22</td><td>Football fields</td><td>28.72%</td></tr>
</table></td><td>Please see the response to comment I20-8, above. Please also see MR-11 (Public Outreach) for additional information regarding public outreach. No changes to the RS-Draft EIR are needed.</td></tr>
</table>

Comment#	Comment Text	Response
	23 Batting Cages 23.30% 24 Racquet ball court 20.10% The results of this survey were submitted to County Park officials, presented at the APG on several occasions, and handed to County officials during their proposed park presentations in Alpine. A Park 4 Alpine also made a formal presentation of the results in a meeting with Dianne Jacob and her staff. As can be seen, the active amenities were in the minority. Does the County really want to destroy endangered habitats, spend millions of taxpayer dollars and create a park that the fewest people in Alpine want to utilize?	
I120-11	A passive park can be so much more than a kiosk and a bench. This description is almost insulting. The County itself has built many passive amenities throughout. They know better. The RC DEIR equates a "passive park" with a nature preserve. They are not the same. Why did the Passive Park Alternative get such short shrift with no consideration for other passive amenities? A Passive Park Alternative would meet all of the objectives laid out by the County.	County DPR has multiple passive parks throughout the County that include access to trails and a parking area/staging area, similar amenities that are included in the passive park alternative. Examples of other County passive parks that include a staging area for the public trail include Morrison Pond, Santa Ysabel, Flume Trail, and Sweetwater, to name a few. No changes to the RS-Draft EIR are needed.
I120-12	Objective 1: Create a place where all Alpine residents can gather and connect as a community. Emphasis is on the word "all." In an active park, people with disabilities, the elderly and the very young are excluded. In a passive park, all people of all abilities can enjoy the open space and passive amenities.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. Although the project would be consistent with this goal, Alternative 5 would not provide a space for the community to be active or congregate. No changes to the RS-Draft EIR are needed.
I120-13	Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community, both now and in the future. Again, with the emphasis, on the word ALL, Alpine does have plenty of active sports fields that have met the needs of sports groups. These fields are already underutilized. Why does the County want to build more? The needs of the remainder of Alpiners have gone unnoticed. NO passive parks have been	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. Alternative 5 would not address these concerns or contribute to responsibly furthering the region's growth. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	funded by the County in Alpine. If the County is bent on spending money on sports fields, let them be built elsewhere - not on Tier 1 habitats.	
I120-14	Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. Hello. A passive or NO park alternative meets this objective hands down. Wright's Field – as it is historically known - is a biological, cultural and geological wonder that clearly meets the MSCP requirements above and beyond.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. No changes to the RS-Draft EIR are needed.
I120-15	Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design. Where feasible? Wright's Field contains more than "natural features." It contains five of California's most endangered habitats. Why are we even considering destroying even a portion of it for sports fields that can be enjoyed elsewhere in Alpine? And for additional sport fields that the majority does not want?	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. The project would have a community park that would meet this objective. No changes to the RS-Draft EIR are needed.
I120-16	Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreational opportunities that improve health and wellness while preserving significant natural and cultural resources. Health and wellness while preserving significant natural and cultural resources. Please explain how a sports field preserves natural or cultural resources? Exceptional: Wright's Field is exceptional all by itself. It is a precious and rare native grassland that has never been plowed – and is the product produced by clay brought down from an ancient mountain ridge to the east that no longer exists. It is an ancient riverbed with the remnants from those ancient mountains. The birds, the insects and the butterflies that use the grassland are all unique and tied to the historical context of its creation. And destroy it for what??? Wright's Field is unique not only to San Diego County, but to the world. It is a treasure that cannot be valued or compared to a ball field. Children get this.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. The project would help the County achieve these policy objectives or make progress toward enhancing the health and wellness of the community. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	Health and wellness studies have repeatedly shown that just being in nature is a biological, spiritual and cultural NEED. Recreational opportunities do not equate with sports. Walkers, joggers and exercisers are seen regularly simply enjoying the existing trails. Why aren't trails considered as "active" recreation? Must all "active" recreation be competitive?	
I120-17	Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design. Crime Prevention through Environmental Design? What? Who wrote this objective? Studies have repeatedly shown that nature has a profound and peaceful effect on a person's mental and physical health. All by itself, nature is crime preventative.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. The project would protect the public health and safety by acting as a temporary safe refuge area and staging area for Alpine FPD should a fire occur in Alpine. The project would provide a four-way stop to slow down traffic on South Grade Road, in addition to adding crosswalks and a walking path for the public. There would also be active monitoring by rangers daily and a live-on volunteer living on site to protect the area from crime under the project. No changes to the RS-Draft EIR are needed.
I120-18	Objective 7: Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations. Again, a passive park alternative more easily and less expensively meets these standards.	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. Please also see MR-12 (Parks Master Plan). The project would provide an opportunity to develop a portion of the property as an active park and conserve a substantial portion of the property as open space. No changes to the RS-Draft EIR are needed.
I120-19	Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine. Architectural elements that reflect the rural nature of Alpine? The "rural nature" of Alpine first began with the Kuumeyaay who used Wright's Field as its main source of food – as evidenced by the abundant archaeological artifacts described in various EIRs that have attempted to destroy this precious land. The grassland of Wright's Field itself was called by the early Spanish settlers "Mesa del Arroz" – or "tableland of rice." The native grass seeds were collected by the Kuumeyaay and cooked as one would rice. The grasslands once attracted deer to be used	Please refer to Chapter 6, *Alternatives*, of the RS-Draft EIR for a detailed discussion of the alternatives and their relationship to the project objectives. The project would be consistent with County of San Diego General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. The project would meet this objective. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
	as meat and hide. The grassland nesting birds provided meat and eggs. The native bulb plants were cooked as potatoes or carrots. Essentially, everything the Kuumeyaay needed to survive was provided by Wright's Field. Not only was it seen as their heritage, the first Spanish colonizers saw Wright's Field as a valuable place to grow other grass varieties such as barley. Additionally, they could allow cattle to graze upon the nutritionally rich native grasses. Their rural lifestyle is witnessed by the numerous historic rock walls, dams and rock/clay foundations on the preserve. Wright's Field was also the location of the white settlers' famous "Jackass Mail Trail" whose trail is supposed to have led directly through the location of your active park leach fields – from grassland to grassland. "Architectural design" need be nothing more than interpretative signage. Guided walks and a website devoted to it. Less is FAR more. Why do we not want to preserve Alpine's rich, unique and irreplaceable rural, historical, geological, biological heritage and why are we forcing a project of common park amenities that only a minority want or could be built elsewhere? Why destroy a heritage that cannot be replaced?	
I120-20	Please do keep me notified of all future meetings, publications and reviews of this project.	The County appreciates the comments submitted on the RS-Draft EIR and will ensure the commenter is on the project mailing list. These comments will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment Letter I121: Thompson, Terri, December 16, 2022

Comment#	Comment Text	Response
I121-1	Please remove me from this email list, I have moved away from Alpine.	This comment is acknowledged and the contact information will be removed from the mailing list. No further response is required. No changes to the RS-Draft EIR are needed.

Comment Letter I122: Van Hyfte, Debbie, December 17, 2022

Comment#	Comment Text	Response
I122-1	Please remove my name from your email list; I no longer live in California.	This comment is acknowledged and the contact information will be removed from the mailing list. No further response is required. No changes to the RS-Draft EIR are needed.

Comment Letter I123: Walker, Virginia, February 9, 2023

Comment#	Comment Text	Response
I123-1	1) From your report, all the oaks ,where you placed the horse parking , will die. Maybe not right away, but they will die because you will be stirring up the ground in their area, as well as putting the bathroom and septic system there. No matter the care you give them, which will cost money, they will die because you will have disturbed the soil in their area too much.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. A significant impact on Engelmann Oaks was identified in Section 4.4, *Biological Resources*, of the RS-Draft EIR. **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures** would be implemented to reduce impacts to less-than-significant levels. As part of **MM-BIO-2**, the County will monitor the health of all Engelmann oaks within 200 feet of the project for 5 years following construction. Mortality or serious declines in the health of the Engelmann oaks during this period will be mitigated at a 3:1 ratio. No changes to the RS-Draft EIR are needed.
I123-2	2) With the growth of people and our drought, how are you going to justify the water use at this park. Most people here in Alpine don't want taxes raised to pay for the water.	Please see the response to comment O8-76. For additional information on water supply assessment and wastewater, please refer to Section 4.19, *Utilities and Service Systems*, of the Draft EIR as well as MR-15 (Water and Wastewater). No changes to the RS-Draft EIR are needed.
I123-3	3) Goal LU-6 Development- Environmental Balance. This states that a built environment should be in balance with the natural environment. Well this park is not in balance with the environment around it. The homes around this area and Wrights Field next door do not match with this park. This park does not follow LUY-10.2. and I could name. so many more parts and pieces of your Recirculated Sections of Draft EIR.	This comment expressing opposition to the project is noted for the record. Please see MR-12 (Parks Master Plan) for more information about park needs in the Alpine community. No changes to the RS-Draft EIR are needed.

Comment#	Comment Text	Response
I123-4	My feeling of what you should do with this park area which would avoid so many of the points in the Recirculated EIR is: 1) Up at the entrance where there is just dirt, should be graded and a small black top parking area. I would have to walk it with someone that could measure and tell me. The rest of it could be graveled or decomposed granite for horse parking only. 2) Here in this area you could place 2 port-a-potties,. 3). In this area, somewhere along the road edge put your Pickle Ball courts. No matter where you put them they will need to be fenced. The horse parking area would be away from this area. Blacktop to Pickle ball courts could be ADA appropriate with a paved path, and ADA approved with the Port-a-potties in the same area. 4) you could put picnic tables under the oaks, that would not make them die and several other places in this area. 5). You would not need any one living here either. 6) With the money you have, go somewhere else in Alpine and make a skate park. It should be somewhere the kids could get too. If is big enough add some basketball courts. I have seen several small pieces of land that would work for this sort of thing.	This comment suggests alternate uses for the project site. Please refer to response to comment O3-4 for additional information on how the Draft EIR and the RS-Draft EIR examined a reasonable range of project alternatives. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.
I123-5	My feeling is you supervisors, especially Mr. Anderson, wants this huge park so that he/they can be known for getting this in here. I feel if you met just Alpine residents that you would have a different outlook as to what we want as a park. Maybe, Mr. Anderson, you could hold a town hall meeting here in Alpine. Not a meeting from the whole county like you did at the start of this. People outside of Alpine would ask for everything, just like they did, but the people of Alpine wouldn't. Thank you for listening and reading this. There are a lot more points in that revised RIE that you are violating also.	This comment is acknowledged. Please also see MR-11 (Public Outreach) for additional information regarding the County's outreach efforts. This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the RS-Draft EIR. No changes to the RS-Draft EIR are needed.

Comment Letter I124: Williams, Patrick, January 5, 2023

Comment#	Comment Text	Response
I124-1	Hello DPR CEQA folks. I tried to open the link below and it is not working. Could you check the path and let me know if it can be repaired? If not, can you please send the defensible space requirements letter to me by email?	This comment was regarding technical difficulties opening the RS-Draft EIR and was responded to by County DPR staff. No changes to the RS-Draft EIR are needed.
I124-2	Thank you Anna, I was continuing to work on it and found that it opened smoothly in another browser (chrome). It was freezing in safari. Other attachments opened smoothly in Safari. Thank you for getting back to me.	The County appreciates the comments submitted on the RS-Draft EIR. These comments will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

Comment Letter I125: Williams, Patrick, February 28, 2023

Comment#	Comment Text	Response
I125-1	Please find attached my comment letter for the Alpine County Park RDEIR. My comment is focused on examination of Project site fire and site fire egress evaluations. Kind thanks for your service to the County.	The County appreciates the comments submitted on the RS-Draft EIR. This is an introductory comment to more in-depth comments later in the letter. These comments will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.
I125-2	I am pleased to provide my comments on the CR Associates (2022) Alpine County Regional Park Fire Evacuation Analysis and the Rhode Associates (2020) Alpine County Regional Park Fire & Emergency Operational Assessment. I feel that extremely important direct fire hazards and fire egress hazards presented in these reports have been sidestepped in Project Planning and that these comments will help focus attention on grave site hazards from toxic gases due to the Project's hill-top location and also to refute the unsupported conclusion that the project has manageable large group egress potential. These two issues alone should disallow this site as a permanent location for mass gathering activities. To facilitate review CRA'22 and RA'20 directly quoted text is produce in Black - *and PLW comments are in produced in Blue.*	This is an introductory comment to more in-depth comments later in the letter. Please see response to comments I125-3 through I125-15, below. No changes to the RS-Draft EIR are needed.

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I125-3	PLW summary of CRA page one • *The evacuation analysis assumes that up to 240 vehicles would evacuate from the proposed Project site. (Project site map (Figure 2) shows 260 parking stalls plus as many as 12 horse truck and trailer rigs so as presented this study undercounts equivalent site parking by at least 32 and as many as 50 – or as much as 20%.* • *CRA analysis indicates it would take up to 2 hours and 31 minutes to evacuate the existing land uses (per the egress study Figures 3, 4) via South Grade Road and Alpine Boulevard (Scenario 1).* • *The analysis also assumes up to 4,029 vehicles and 4,432 vehicles [sic] would evacuate from the surrounding land uses, under the Existing and Cumulative scenarios, respectively. (my estimate is at least 5300 for the Project area per the egress study and in the Project-adjacent areas immediately to the E and ESE not included in the egress study per CRA Figure 3).* summary of study bullets: • *It would take up to 2 hours and 31 minutes to evacuate the existing land uses via South Grade Road and Alpine Boulevard (Scenario 1). If the TWLTL (two way left turn lane) along Alpine Boulevard is utilized as an evacuation lane, then the evacuation time reduces to 1 hours and 33 minutes (Scenario 2).* • *Evacuating the Project Traffic only (Scenario 3) would take up to 31 minutes.* • *Evacuating all existing land uses and the Project would take up to 2 hours and 40 minutes to evacuate the existing land uses via South Grade Road and Alpine Boulevard (Scenario 4). If the TWLTL (two way travel lane) along Alpine Boulevard is utilized as an evacuation lane, then the evacuation time reduces to 1 hours and 41 minutes (Scenario 5). Thus, the Project increases the total evacuation time by 9 Minutes and 8 Minutes, respectively.*	The project includes up to 240 parking spaces, which is analyzed in the evacuation technical report. If changes are made to the parking spaces during final design, the evacuation conditions will be reassessed. Additionally, the total number of existing vehicles was determined by CRA, leveraging data on average vehicle ownership in the area from the U.S. Census, the Institute of Transportation Engineer Parking Generation rate, and a review of aerial images, as detailed in Attachment A of the evacuation memorandum. The assumption, as outlined in Attachment A, adopted a conservative approach by presuming maximum occupancy of high-demand areas like the Shadow Mountain Grace Church and Janet Montana Café, even though the aerial image reviews suggested that these sites were not fully occupied. The commenter did not offer a reliable source to validate the "estimate" mentioned in the comment. No changes to the RS-Draft EIR are needed.

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	• *Evacuating all cumulative land uses and the Project would take up to 2 hours and 53 minutes to evacuate the cumulative land uses via South Grade Road and Alpine Boulevard (Scenario 4). If the TWLTL along Alpine Boulevard is utilized as an evacuation lane, then the evacuation time reduces to 1 hours and 50 minutes (Scenario 5). Thus, the Project's increase the total evacuation time by 12 minutes and 8 minutes, respectively.*	
I125-4	*I assert that given the issues discussed below, including of that of ignoring up to 1000 vehicles egressing from Palo Verde Ranch and Rancho Palo Verde onto South Grade Road that these estimates are substantially in error and that South Grade Road is very likely to be in gridlock during fire passage, even without the Project's addition of up to 280 equivalent vehicles. I leave it to staff to explain why ≥200 adjacent estate homes were not included in this study that are in addition to the 4029 study vehicles and the up to 280 Project vehicles merging onto South Grade Road and Alpine Boulevard. Will the maximum number of vehicles traveling from the study area be corrected to more than 5300 vehicles to better represent maximum vehicles?. How is it defensible to insert a mass gathering Project for "up to thousands of daily users" (quote: Rhodes, 2020) into this existing extreme hazard site?*	The commenter did not provide information to justify the assumption of gridlock. As referenced in Annex A and other evacuation plans, the current standard practice of targeted evacuation helps mitigate the risk of gridlock and facilitates a more manageable evacuation procedure. After-action fire reports demonstrate successful evacuation of the areas mentioned. Given that fire evacuation orders are contingent on various factors such as the scale, location, date/time, among others, it is infeasible to model all potential scenarios where a fire could occur. Instead, the evacuation analysis focuses on areas that use the same roads as the project site and are likely to receive evacuation orders concurrently with the project site. This approach still overestimates the scale of evacuation by assuming a mass evacuation, whereas the current protocol is to order targeted evacuations (as exemplified in other fire action reports). Therefore, it is unlikely that Rancho Palo Verde and adjacent areas would be ordered to evacuate at the same time as the project site and this was not included in the analysis. It is noted that the fire evacuation area and assumption were developed in coordination with the County Fire department due to its expertise and understanding of the area. No changes to the RS-Draft EIR are needed.
I125-5	CRA page two • managers may halt evacuations of the Project at any point during an evacuation event to move traffic that is of higher priority. The Project may also serve as a temporary evacuation point for evacuees from other areas due to its	See the response to comment I125-4. No changes to the RS-Draft EIR are needed.

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	design as a fire-resistant zone. Evacuations throughout San Diego County operate on a priority basis, with those populations that are of greatest risk or highest exposure considered the highest priority. Downstream traffic flow is managed to move these populations first and the Project provides an opportunity to protect the park uses and nearby residents (if they evacuate to the Project's site) while prioritizing movement of populations that are at greater risk, reducing the evacuation times for those populations, possibly substantially. • Neither CEQA, nor the County has adopted numerical time standards for determining whether an evacuation timeframe is appropriate. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. The County considers a project's impact on evacuation significant if the project will significantly impair or physically interfere with implementation of an adopted emergency response or evacuation plan; or if the project will expose people or structures to a significant risk of loss, injury, or death involving wildland fires. *Should we conclude that the absence of County or CEQA standards permits the building of a mass gathering park in a zone with a very high fire hazard and a multi hour evacuation model? Doesn't this present a very high probability to "expose people or structures to a significant risk of loss, injury, or death involving wildland fires"?* Based on the evacuation simulations above, evacuation traffic generated by Project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed. This "worst-case" evaluation is not required by CEQA; requirements of the Annex Q for the determination of evacuation times. The roadway network and vehicle input assumptions have been selected to simulate a "worst-case"	

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	evacuation scenario that would occur when park usage if the highest. This "worst-case" evaluation is not required by CEQA; indeed, CEQA requires the application of reasonable standards and criteria only. Nonetheless, this preparer imposed a "worst-case" evaluation out of an abundance of caution. In an actual wildfire event, it is likely that fewer park users would be presented on site and fewer residents/customers would be presented in the evacuation area. While other evacuation scenarios are also possible, such as evacuation during morning or evening peak hours, however, during those hours, residents are likely to be away from their respective homes, and park users are not likely to arrive at the Project, thus they are already in a safe area. Under an evacuation order, first responder and law enforcements would not allow residents to return an endangered area. Therefore, the worst case is when everyone is already at home and attempt to leave all at once with all their vehicles.	
I125-6	Assumptions (CRA page three) Scenario 1 (e.g. Figures 3, 4) neighborhood evacuation without park. 2h31m Scenario 2 same as scenario 1 except that central TWLTL on Alpine Blvd is utilized for egress. 1h31m Scenario 3 project only is evacuated as illustrated on Figure 6 *[Figure 6 not in report]*. 31m Scenario 4 is combination of Scenario 1 and Scenario 3. 2h40m Scenario 5 is combination of Scenario 2 and Scenario 3. 2h41m Scenario 6 is same as Scenario 1 but with 10% anticipated residential growth. 1h43m Scenario 7 is same as Scenario 6 but with use of central TWLTL on Alpine Blvd for egress. 2h50m Scenario 8 is same as Scenario 6 with addition of project traffic. 1h53m Scenario 9 is same as Scenario 7 with addition of project traffic. 2h55m	See the response to comment I125-4. No changes to the RS-Draft EIR are needed.

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	All of the Scenarios appear to assume that most of Palo Verde Ranch and most of Rancho Palo Verde will NOT BE EVACUATED (see CRA Figure 3) --> up to 300 estate homes averaging 4 to 6 net bedrooms will also be competing to evacuate to Alpine Boulevard, possibly by as much as doubling model estimates of evacuation times for South Grade Road.	
I125-7	Evacuation assumptions: *Residences were assumed to have 2.1 vehicles per address and states this is conservative as a significant number of addresses were assumed to be vacant. The CRA study also does not evaluate that a high percentage of Project-adjacent homes have ADU's. I also assert that the vacancy rate in Project adjacent homes is well below 5% based on Alpine's very-low home sale and home rental offerings.* Assumes 3142 residential vehicles, 811 "commercial site" vehicles and 61 church vehicles for a total of 4029 without park and 4269 with 240 park vehicles - *(Park actually has ca. 280 equivalent vehicles with ca. 12 truck-and-horse-trailer spaces and ca. 20 "reserved" spaces.* Assumes just 2% of vehicles would be trucks with trailers from "national averages". This seems incredibly low in this high livestock-ownership and RV-user area *(estimate of trucks and trailers therefore probably underestimated by at least 2x to 4x).*	The commenter did not provide evidence regarding the assumption about accessory dwelling unit construction. However, the analysis conducted included a 10-percent increase in project traffic, which would account for accessory dwelling units in the area. No changes to the RS-Draft EIR are needed.
I125-8	*Conclusions of this study are unrealistic and in error in the following instances:* *Total vehicle space at the park is understated (discussed above).* *Study evacuation subareas (Figure 3) does not include some 200-300 estate homes in Rancho Palo Verde and Palo Verde Ranch subdivisions. This omission is not presented, discussed or explained. Those residences commonly contain ADU's in addition to primary dwellings and net vehicles for these properties is likely 3 to 5 equivalent vehicles, and up to 1000 additional vehicles merging onto South Grade Road in addition to the 4029 vehicles evaluated as "existing" and up to 280 Project vehicles.*	Please see the response to comment I125-4 regarding the Rancho Palo Verde assumption and the response to comment I125-7 regarding accessory dwelling units. See the response to comment I125-3 regarding parking spaces. No changes to the RS-Draft EIR are needed.

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I125-9	*Past successes in San Diego County evacuation are taken as comfort in the CRA study conclusions. Please see Rhode Associates (2020) Alpine County Regional Park* *Fire & Emergency Operational Assessment which asserts the Park site and Alpine as a whole* *"...are situated to arguably pose one of the worst Wildland-Urban Interface conditions in the County of San Diego and is in a known location of repetitious major wildfire occurrence. Such locations of repeat occurrence are known as "historical wildfire corridors""* *Past luck and serendipity is a very weak argument to overlay additional burdens to Alpine wildfire planning, however small, and adding of at least 10% to egress traffic on two lane South Grade Road is very hard to justify in the face of the Rhode 2020 evaluation and very likely violates the San Diego County codes and ordinances regulating expansion (and building of permanent mass gathering facilities in areas of very high wildfire danger?)*	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.
I125-10	Additional Fire Risk from Project: (Rhodes Associates 2020, Page 9-12) Risk 3 "It is likely that human use will increase on the site with this development with an associated increase in the intensity of wildfire ignition risks. A University of Colorado, Boulder study (National Academy of Sciences, 2017) identified that 84% of all wildfires nationally were human caused during the period 1992-2012, and this risk should be addressed." *In other words overflow of Project site foot and bike traffic onto high fuel and dry fuel areas immediately adjacent is a grave fire risk on its own and the likelihood of human caused fire ignited directly on Park and BCLT property must be considered nearly impossible to fully (or even fractionally) "mitigate".*	Please refer to MR-9 (Wildfire) and Section 4.9 *Hazards and Hazardous Materials,* of the RS Draft-EIR for information regarding wildfire and emergency response and evacuation. The historical unregulated public use of these lands would be regulated and managed by County DPR. This includes the introduction of new and enhanced fire prevention measures. Development of the sports fields, associated parking, public facilities, and support buildings would include landscaping to isolate these facilities from the surrounding wildland, a requirement of the fire and building codes. This would reduce wildfire exposure and ignition risks. County DPR would coordinate with the utility service provider to consider undergrounding the adjacent electric utility services. Additional fuel reduction measures would also be implemented to further isolate these uses for public safety and ignition resistance. No changes to the RS-Draft EIR are needed.
I125-11	Rhode 2020: Facility Fire-Safe Design (Rhodes Associates 2020,Page 12-13) "The installation of manicured, irrigated landscaping such as lawns and other fire resistive plantings will offer a fire safe area where the two dog parks, three soccer fields	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.

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	and a baseball diamond are proposed. Additionally, the paved parking lot, basketball and pickleball courts, equestrian area and other cleared assets will serve as not only a buffer to protect the park from wildfire spread, but also provide a Temporary Safe Refuge Area (TSRA) for humans and animals for safe haven during wildfire." *The project is on a HILLTOP LOCATION relative to fire propagating from the east through thousands of acres of mature vegetation and 300 estate homes, attends the possibility of producing a literally toxic smoke environment at ground level across the Project site. A Project area cross section from Viejas Creek just east of the park illustrating this geography is below. The cross sections shows that the hilltop location is not insignificant with gradients as step as 25% just east of the Project. Why have the fire egress and planning studies ignored this rather obvious hazard to the park site that very plausibly could result in an inhospitable scenario for a Project-site TSRA?*	
I125-12	Figure Caption: air photo and topographic cross-section from Viejas Creek in Palo Verde Ranch to the entrance of the proposed Project. Note that maximum gradient down-to-the-east is 25% and that more than 200 estate homes and a vast area of old growth chaparral are located adjacent and E of the project and another 100 estate homes are located ESE and S of the proposed Project:	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.

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	 "It is likely that park facilities such as its parking lot(s) and equestrian staging will serve as the nearest emergency safe refuge for park users recreating in its open space, and may also serve the emergency needs of nearby park neighbors during a regional wildfire. For this reason, parking and equestrian areas should provide broad expanses of non-combustible surfaces that are absent of combustible ground cover (including in planters) with at least two hundred feet of clearance from native vegetation whenever possible. Trees within these facilities should be maintained in a trimmed state, free of dead plant material and lower limbs removed. Fuel modification of adjacent native fuels may be used in coordination with development of these developed areas when necessary to achieve minimum recommended fuel clearance widths." *Providing two hundred feet of clearance from native vegetation as advised above to develop the site ass a TSRA would double the area cleared for the active use park and certainly would violate the biological mitigation proposed in the Project EIR.*	

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I125-13	Rohde Associates 2020: Summary of Findings (Page 26-27) *The first of these should give great concern to reviewers of this EIR:* " 1. The two-adjoining park/reserve facilities, while managed separately by County Parks and BCLT, have many relationships and ties both geophysically and ecologically. They also share a similar wildfire risk, and fire prevention outcomes will be shared for better or worse by both facilities. A rich history of wildfire affects these lands, as does an annual experience of dangerous wildfire conditions." " 2 ...They also plan to implement restrictions on overnight use, smoking, use of open flame, and vehicle access as part of its overall fire prevention program. These are appropriate and effective mitigations for the park given its fire history and onsite fire hazards." *Given the above that the adjoining BCLT ownership and acquired Park property has NEVER BEEN PATROLLED BY LAW ENFORCEMENT OR BY BCLT STAFF is suddenly going to have a supervision for hundreds of new users and transiting youth is fantastically unrealistic!*	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks on site. The County will implement adequate measures and restrictions to ensure safety and security for new users. In addition, the project would employ onsite staff that would provide new security for park facilities upon buildout. No changes to the RS-Draft EIR are needed.
I125-14	3. A long-term fuel modification program is needed to protect the County park/BCLT Reserve from wildfire impacts due to offsite ignition, and to protect neighboring development from wildfire moving through or from park/reserve lands. Alternatives for completion of this effort are detailed in this study. The fuel modification program should be designed to achieve fire prevention needs while minimizing environmental impacts and maintaining habitat. 4. Funding resources for fuel modification maintenance has been inconsistent for BCLT reserve lands. County Parks and BCLT need to collaborate with various stakeholders and government entities to acquire long-term funding and resources to support fuel modification. *Is this permanent fuel modification expense explicitly accounted for in the Project planning?*	Permanent fuel modification expenses are explicitly accounted for in the project planning phase. The County will continue to maintain an existing 100-foot buffer adjacent to the northern project boundary and a 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by Alpine FPD. The County would create an additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint. The County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel. BCLT has conducted some fuel modification and planned other sites. County DPR will collaborate with the BCLT to construct fuel breaks on adjacent BCLT parcels. Please refer to MR-9 (Wildfire) for additional information regarding fuel modification. No changes to the RS-Draft EIR are needed.

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I125-15	6. Development of the Alpine Regional Park in accordance with the County of San Diego proposed park design and local fire and building codes will develop fire safe facilities that will be resilient to wildfire. The park will also be positioned to provide temporary safe refuge in its sports fields, parking, and equestrian facilities to the greater community in case of wildfire. *As above the project is on a HILLTOP LOCATION relative to fire propagating from the east through more than 1000 acres of mature vegetation and 250 estate homes attends the possibility of literal TOXIC SMOKE passing at ground level through the Project site. A cross section from Viejas Creek immediately east of the park illustrating this geography is attached. The cross sections shows that the hilltop location is not insignificant with gradients as step as 25% just east of the Project. Why have the fire egress and planning studies ignored this rather obvious hazard to the park site that could plausibly result in a mass casualty scenario if the Project is designated as a TSRA?*	Please refer to MR-9 (Wildfire) for information regarding wildfire factors, emergency response and evacuation, and other sufficient controls that would be in place to reduce wildfire risks. No changes to the RS-Draft EIR are needed.
I125-16	8. Park development will not present unmitigable impacts or a significant increase in call volume for local emergency services and may be developed without addition to existing regional fire resources or establishment of new or unreasonable wildfire risks. *The Rhode and CR Associates studies provides useful discussion of mitigation of wildfire risk in Alpine but in particular the CRA evaluation is wholly deficient in supporting this statement on the basis of the Project egress and fire hazard issues evaluated in this comment letter.*	This comment is acknowledged. Please see responses to comments I125-3 through I125-15, above. No changes to the RS-Draft EIR are needed.
I125-17	I am pleased to provide these comments on the CR Associates fire evacuation analysis of 31 October 2022 and the Rhode Associates fire and emergency operational assessment of 17 August 2020. I feel that fire issues have been sidestepped in Project planning and that these comments will help focus attention on grave site hazards from the Project's hill-top location, and the implausible and unsupported conclusion that the project has manageable egress potential. These two issues	The County appreciates the comments on the RS-Draft EIR. These comments will be shared with the County of San Diego Board of Supervisors. No changes to the RS-Draft EIR are needed.

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	alone should disallow this site as a permanent location for mass gathering activities. Kind thanks for your attention to this comment letter.	

Comment Letter I126: Smith, Sheri (Voicemail), December 20, 2022

Comment#	Comment Text	Response
I126-1	Hi Anna, my name is Sheri Smith and I'm calling regarding the Notice of Availability for the draft Environmental Impact Report for the Alpine Project and it says documents are available for review. What I'm wondering is if these documents actually show the detail of the plans. We live in Alpine Heights East which we have turn to into Via Viejas and concerned about where parking and the entrance to the County park is going to be. It sounds like a wonderful project, but it looks like it's pretty ambitious with all the different activities that are going to be available and I'm more concerned about parking and people parking on the streets kind of impeding the entrance to Via Viejas and the amount of traffic getting into there. I just wanted to know what kind of traffic control there will be there on South Grade and if this plan, the documents that are available for review, are going to give that kind of detail for us.	The County appreciates the comment submitted on the RS-Draft EIR. Please see MR-7 (Transportation and Safety) for additional information on project access and roadway operation and safety. This comment will be provided to the County of San Diego Board of Supervisors for consideration as part of the Final EIR for the project. No changes to the RS-Draft EIR are needed.