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February 3, 2021

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Governor's Office of Planning & Research

Feb 03 2021

STATE CLEARINGHOUSE

Subject: Comments on the Draft Supplemental Environmental Impact Report for Alpine Community Plan Update, General Plan Amendment, County of San Diego (SCH #2018081093)

Dear Ms. Beddow:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Draft Supplement Environmental Impact Report (Draft SEIR) for Alpine Community Plan Update (CPU), General Plan Amendment (GPA). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code (CDFW 2020).

CDFW's Role

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

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. San Diego County (County) participates in the NCCP program through implementation of its approved Multiple Species Conservation Program (MSCP) Subarea Plan in southwestern San Diego County, referred to as its South County MSCP (SC MSCP). The County is also pursuing development of its draft North County and East County Subarea Plans (NC MSCP and EC MSCP, respectively). According to the Alpine CPU, GPA SEIR graphics, most of the western half of the Alpine Community Planning Area (CPA) land occurs in the County's existing adopted SC MSCP plan area and the rest of land to the east contains primarily former Forest Conservation Initiative (FCI) lands located within the County's in-process EC MSCP planning area.

Conserving California's Wildlife Since 1870

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PROJECT DESCRIPTION AND SUMMARY

Proponent: County of San Diego

Project Location: Alpine is an unincorporated community in the eastern portion of the County, approximately 25 miles east of downtown San Diego. The Alpine CPA covers approximately 68,100 acres of land that is characterized by diverse geography, residential land use patterns, and an established town center area. The Alpine CPA is bisected horizontally by Interstate 8 (I-8), with the majority of the population concentrated in and around the Alpine town center, which is adjacent to I8. Cleveland National Forest comprises most of the land in the eastern and northern portions of the CPA. The town of Alpine, which is in the north-central portion of the CPA, is the most densely populated community within the planning area. Local development on both sides of I8 consists primarily of residential/rural-residential, commercial, industrial, and mixed uses. The planning area also includes the communities of Peutz Valley, Japatul Valley, Hidden Glen, Dunbar Lane, and Galloway Valley. The Viejas Indian Reservation and Capitan Grande Reservation are also within the boundaries of the Alpine CPA but are not under the County's jurisdiction.

Project Description/Objective: The project is a comprehensive update to the Alpine Community Plan (Project). The Draft SEIR tiers from the General Plan (GP) Program EIR (County 2011) and the Forest Conservation Initiative (FCI) Supplemental EIR (SEIR) (County 2016 and 2019) and includes updated baseline conditions. The project would further refine the land use patterns established in the GP Update (County 2011). Development of the project must remain consistent with the goals, policies, and planning concepts identified in the County GP and other relevant County plans and programs.

The Project SEIR is programmatic in nature in that it analyzes the reasonably foreseeable impacts of the changes to the plan. The Project does not propose any specific development project that would result in physical impacts on the environment. It is reasonably foreseeable that future individual projects that are implemented under the Project could result in physical impacts on the environment. Additionally, while the Alpine CPU provides guidance and opportunities for future growth within Alpine, it does not mandate development. Approval of the SEIR would include a GPA to incorporate the changes to the Community Plan, including but not limited to land use designations and the mobility network. CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. The Project would also update and refine the use of streamlining under CEQA Guidelines 15183 specific to the Alpine CPA.

Out of six alternatives, the Proposed Project selected is the Village Focused land use designation alternative. The Project would update and refine the current community plan goals and policies. Furthermore, the Project proposes to change land use designations within four of seven subareas. Increased Biological impacts to subareas 2, 4, and 6 will be greater than the proposed impacts defined in the current General Plan and Alpine Community Plan. The seven subareas are: (1) Northwest Village; (2) Tavern Road; (3) Otto Avenue; (4) Northwest Community Planning Area; (5) Eastern Alpine; (6) Alpine Village; and (7) Former FCI Lands Outside of Alpine Subareas 1-6. Alternatives may involve all seven subareas within the Alpine CPA. Alternative 7 is identified in the SEIR as the Environmentally Superior Alternative (ESA). The ESA would place the former FCI land use

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designations of Rural Land 40 (RL-40) or lower density on the Alpine FCI Lands and also on the former FCI lands within the Alpine community planning area (SEIR Appendix A, page 4).

The proposed land use changes could result in increased density and intensity in the CPA compared to the existing land uses. The changes and new designations would concentrate local services and residential density in the existing developed Village area and are intended to support mixed-use and transit-oriented development.

Timeframe: November 2020 Draft SEIR circulation and public review was extended from an end date of December 21, 2020 to February 4, 2021. The estimated SEIR approval date has therefore moved from May 2021 to approximately July 2021.

Biological Setting: The entire Project area is within the Regional MSCP Plan area (San Diego 1998) and contains Biological Core and Biological Linkages. Westerly portions of the Project are within the adopted SC MSCP, including lands identified as Pre-Approved Mitigation Areas (PAMA) and Biological Core Resource Areas (BCREs) and Linkages. Easterly portions of the Project are identified as being within the EC MSCP subarea and contain areas mapped as Focused Conservation Areas (FCA).

A Planning Agreement for the NC and EC MSCP planning efforts recently expired and is currently being processed for renewal. Once renewed, Project portions within the EC MSCP would again be considered interim projects and subject to the Habitat Loss Permit (HLP) process which is summarized in the Draft SEIR.

The Draft SEIR identified potentially significant environmental impacts to Biological Resources although a standalone Biological Technical Report was not provided. Per the Project SEIR, nine vegetation community classifications types (consistent with Oberbauer 2005) occur within the Alpine CPA as follows: chaparral, coastal sage scrub, grasslands, marshes, meadows and seeps (includes vernal pools), other woodlands, riparian vegetation, water, urban disturbed habitat, agriculture, and Eucalyptus woodland.

California Natural Diversity Database (CNDDDB) species information, accessed in 2019 for the SEIR, indicates that state rare (SR), CDFW Watch List (WL), fully protected (FP), and species of special concern (SSC); or California Endangered Species Act (CESA)-listed or federal Endangered Species Act (ESA)-listed are known in the project area. These species are listed below and status as a SC or EC MSCP covered species is also indicated respectively as SC or EC. Sensitive plant species known in the Project area include: Cuyamaca larkspur (*Delphinium hesperium* ssp. *cuyamacae*, SR); Dehesa beargrass (*Nolina interrata*, SE, CS); Dunn's mariposa lily (*Calochortus dunnii*, SR, CS); Encinitas baccharis (*Baccharis vanessae*, FT, SE, CS); Gander's ragwort (*Packera ganderi*, SR, EC); Mexican flannelbush (*Fremontodendron mexicanum*, FE, SR); and San Diego thorn-mint (*Acanthomintha ilicifolia*, FT, SE, SC).

Sensitive amphibians and reptiles include: arroyo toad (*Anaxyrus californicus*, FE, SSC, EC, CS); Blainville horned lizard (*Phrynosoma blainvillii*, SSC, EC, SC); California glossy snake (*Arizona elegans occidentalis*, SSC); coast patch-nosed snake (*Salvadora hexalepis virgultea*, SSC, EC); coast range newt (*Taricha torosa*, SSC, EC); coastal whiptail (*Aspidoscelis tigris stejnegeri*, SSC); Coronado skink (*Plestiodon skiltonianus*

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interparietalis, WL, EC); orange-throated whiptail (*Aspidoscelis hyperythra*, WL, EC, SC); red-diamond rattlesnake (*Crotalus ruber*, SSC, EC); silvery legless lizard (*Anniella pulchra*, SSC, EC); southwestern pond turtle (*Actinemys pallida*, SSC, EC, SC); two-striped gartersnake (*Thamnophis hammondi*, SSC, EC); and western spadefoot (*Spea hammondi*, SSC, EC).

Sensitive bird species include: Bell's sparrow (*Artemisospiza belli*, WL); coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*, SSC, EC, SC); coastal California gnatcatcher (*Poliophtila californica*, FT, SSC, SC); Cooper's hawk (*Accipiter cooperii*, WL, SC); golden eagle (*Aquila chrysaetos*, WL, FP, EC, SC); least Bell's vireo (*Vireo bellii pusillus*, FE, SE, SSC, EC, SC); southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*, WL, EC, SC); southwestern willow flycatcher (*Empidonax trailii extimus*, FE, SE, EC, SC); Swainson's hawk (*Buteo swainsoni*, ST, SC); tricolored blackbird (*Agelaius tricolor*, ST, SSC, EC, SC); and yellow-breasted chat (*Icteria virens*, SSC).

Sensitive invertebrates include Hermes copper butterfly (*Lycaena hermes*, FC, EC) and quino checkerspot butterfly (*Euphydryas editha quino*, FE, EC), and sensitive mammals including: American badger (*Taxidea taxus*, SSC, SC); big free-tailed bat (*Nyctinomops macrotis*, SSC); Dulzura pocket mouse (*Chaetodipus californicus femoralis*, SSC); northwestern San Diego pocket mouse (*Chaetodipus fallax*, SSC); pallid bat (*Antrozous pallidus*, SSC, EC); pocketed free-tailed bat (*Nyctinomops femorosaccus*, SSC); San Diego black-tailed jackrabbit (*Lepus californicus bennettii*, SSC, EC); San Diego desert woodrat (*Neotoma lepida intermedia*, SSC); Townsend's big-eared bat (*Corynorhinus townsendii*, SSC, EC); western mastiff bat (*Eumops perotis californicus*, SSC); western red bat (*Lasiurus blossevillii*, SSC); and western yellow bat (*Lasiurus xanthinus*, SSC). CDFW also notes that both mountain lion (*Felis concolor*, State candidate for CESA listing, SC) and Southern mule deer (*Odocoileus hemionus fuliginata*, SC) may also occur in the Alpine CPA but are not listed in the SEIR.

COMMENTS AND RECOMMENDATIONS

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

Recommendation 1. CDFW recommends that an additional Project Objective be added to Section 1.1 of the SEIR to emphasize the County's long-standing commitment to preservation of wildlife and natural resources in the CPU area and throughout San Diego County. The Objective should further clarify that any subsequent individual projects under the SEIR will comply with and support the conservation goals of the County's approved SC MSCP, and those of an approved EC MSCP to the maximum extent possible if/when adopted. This should include maintaining full function of the wildlife movement corridors such as the one extending from the south end of El Capitan Reservoir to Peutz Valley Road/I-8 (via Chocolate Canyon), as well as avoidance/minimization of impacts to SC MSCP narrow endemic species and to major populations of SC MSCP covered species.

Recommendation 2. The Alpine SEIR tiers off the 2011 GP FEIR and the 2016 FCI SEIR and carries over all significant and unmitigated impacts to biological resources previously identified in those documents. Through use of the CEQA 15183 it is unclear if significant and unavoidable

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impacts to identified special status plants and wildlife species, riparian habitat and other sensitive natural communities, and wildlife movement corridors and nursery sites could potentially occur with adoption of the SEIR. The SEIR indicates that subsequent projects would be reviewed by the County for potentially significant biological resources present. If present, the County's "Guidelines for Determining Significance – Biological Resources" would be applied and appropriate mitigation measures would be applied, as required. The County's commitment to the SC MSCP will require use of standardized mitigation ratios for projects within that approved NCCP area. For subsequent projects outside of the SC MSCP plan boundary, notwithstanding the use of CEQA 15183 provisions, CDFW recommends affirming that when performing review, the County will continue to apply mitigation ratios for species and vegetation communities as are currently commonly applied for projects in the NC and EC planning areas.

Recommendation 3. The Conservation and OpenSpace Element policies intend to promote a balance of connectivity for wildlife and the community. CDFW acknowledges that the NCCP program is based on creating a balance between conservation and compatible development. Various CPU alternatives are likely to result in additional or wider roads passing through conservation lands, and these can easily result in impacts to local or regional movement corridors that could render them non-functional for some species. Therefore, during the Significance Determination process, CDFW recommends that the analysis include a thorough assessment of road designs incorporating bridges or large culverts as well as smaller scale design features and directional fencing to facilitate safe movement for both large and small animal species. Specific information to improve wildlife corridor usage has been developed by the U.S. Geological Survey (USGS), San Diego Management and Monitoring Program, and others through funding provided under San Diego Association of Governments (SANDAG) Transnet Environmental Mitigation Program.

Recommendation 4. In addition to the proposed zoning changes, the SEIR assumes there will be a Transfer of Development Rights (TDR) pilot program undertaken whereby development units within areas targeted for conservation can be relocated into areas which will be developed. CDFW has no objection to the concept and supports this 'clustering' approach to better consolidate development, which should also result in less habitat fragmentation and reduce edge effects on conserved lands. However, it must also be recognized that if state or federal funds have been used to acquire and conserve specific lands, which were presumably purchased at a fair/appraised market value that included consideration of the number of development units on an acquired parcel, there must be some mechanism to compensate for the value of the units which would be transferred. Otherwise, an entity receiving those transferred units could be viewed as having received a 'gift of public funds' and be in conflict of the original purchase for conservation purposes. CDFW and the Wildlife Conservation Board (WCB) request to be consulted in developing the TDR pilot program.

Recommendation 5. To enable a clearer understanding when reviewing forthcoming projects, CDFW recommends providing one or more graphics which clearly show potential increased intensity/density elements with Alpine Subareas 1-7 in relation to Biological Core and Linkages identified in the adopted SC MSCP and draft EC MSCP. This may aid identification of measures to reduce detrimental edge effects when reviewing forthcoming projects.

Recommendation 6. In the notes of Table 2.4-4, "SR" (State Rare) should be defined for Special-Status Plant Species with Potential to Occur within the Alpine Community Plan Area.

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Recommendation 7. On Table 2.4-4 and 2.4.5, CDFW recommends indicating if the Special-Status Plant and Animal Species are covered by the SC MSCP or proposed for coverage under the EC MSCP.

Recommendation 8. As general guidance to reduce detrimental edge effects to adjacent conserved lands, CDFW recommends future development projects demonstrate compatibility with biological resource areas by the use of non-reflective glass, and reduce direct and indirect impacts from grading of when creating manufactured slopes or establishing brush management areas. Stormwater drainage and toxins should be dissipated and filtered before release and chemicals and sediment be prevented from entering natural areas. Project lighting should be shielded and directed away from biological areas, and during the breeding season construction noise impacts should be reduced to 60dBA or less (1 hour rated) at the edge of the biological resource line. Additionally, barriers, signage and fences should be used to protect natural areas from invasive or exotic species, domestic animals, and unauthorized human encroachment.

Filing Fees

The Project, as proposed, could 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 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).

Conclusion

CDFW appreciates the opportunity to comment on the SEIR to assist the County in adequately identifying, analyzing, and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming documents and hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Holly Smit Kicklighter, Senior Environmental Scientist (Specialist), at Holly.SmitKicklighter@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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David Mayer
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