APPENDIX B – 2007 NOP AND RESPONSES

State of California – The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

NOTICE OF PREPARATION

PROJECT TITLE: Equestrian Facilities Project

Cuyamaca Rancho State Park
San Diego, CA

The California Department of Parks and Recreation (CDPR), as Lead Agency under the requirements of the California Environmental Quality Act, is considering the preparation of an environmental document (Environmental Impact Report) for the project identified above. A brief project description and list of anticipated environmental effects to be considered in the environmental analysis are contained in this Notice of Preparation (NOP). Interested persons, organizations, and agencies are encouraged to comment on the scope and content of the information to be included and analyzed in the CEQA analysis. Agencies should comment on the elements of the environmental information that are relevant to their statutory responsibilities in connection with the proposed project. Please send your written response to Karen Miner, CDPR Project Manager, at the address shown below. Responses should include your name or the name of a contact person at your agency or organization, and mailing address. Please send your response at the earliest possible date, but no later than July 11, 2007.

Two previous NOPs were issued for the Cuyamaca Rancho State Park, Los Caballos Equestrian Campground Project. These NOPs addressed the replacement of Los Caballos Equestrian Campground. This NOP is for an entirely new project which will establish new equestrian facilities near the community of Descanso in the southern portion of the park including a campground, day-use amenities, and staging area. Additionally, the project proposes to construct permanent day-use equestrian staging near Paso Picacho and establish connecting trails to these facilities where needed.

For those interested, an informational public meeting, pursuant to Public Resource Code 21083.9, will be held on June 12, 2007 at Descanso Town Hall, located at 24536 Viejas Grade in Descanso. The meeting will be held in a continuous, open forum format and the public may attend anytime from 5:00 p.m. to 8:00 p.m.

All documents pertinent to this project are located at CDPR's Southern Service Center (see following address). The NOP and site map are available on the following websites:

http://www.parks.ca.gov/?page_id=983
http://www.parks.ca.gov/default.asp?page_id=24063

DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON:
Karen Miner, Project Manager
Southern Service Center, California Department of Parks and Recreation,
8885 Rio San Diego, Suite 270, San Diego, California 92108
Fax (619) 220-5400
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PROJECT DESCRIPTION: The proposed project would create new equestrian facilities near the community of Descanso in the southern portion of the park including a campground, day-use amenities, and staging area within Cuyamaca Rancho State Park. The proposed campground project will include approximately 20 individual campsites (including a host site), comfort station, horse corrals, round pens, arena, shade ramadas, picnic areas, hitching rails, landscape and shade tree plantings, day-use equestrian staging, and associated amenities, utilities, and infrastructure. The proposed project would also create a day-use staging area near Paso Picacho, including space for approximately 8 truck and trailer rigs with pull-through parking and amenities. Some trees may need to be removed or thinned. New trails and/or trail connections to existing trails, including the California Riding and Hiking Trail, will be developed as part of the project. Depending on site conditions, restrooms would be on septic and/or a contained vault system, and access to water and power may need to be developed as part of the project.

PROJECT LOCATION: The proposed project is located in San Diego County within Cuyamaca Rancho State Park, and involves two separate project sites. (see attached project location map):

The two sites are:

Merigan Ranch Area – Equestrian Campground, Day-use Facilities and Trailhead Staging, a former agricultural site located adjacent to the unincorporated community of Descanso, at the southern end of Cuyamaca Rancho State Park. Access would be made from Viejas Blvd. off Highway 79.

Paso Picacho vicinity – Equestrian Staging, located on the east side of Hwy 79 across from the existing Paso Picacho use area, along the Cold Stream Trail.

POSSIBLE EFFECTS AND MITIGATIONS: In compliance with CEQA Guidelines Sections 15071 and 15126, and based on the existing resources and anticipated uses of the proposed facilities, potential environmental effects that will be addressed in the CEQA analysis include, but may not be limited to: biological resources (including sensitive species and wetlands), cultural resources (including archeological sites, historical resources, and traditional cultural properties), visual resources (aesthetics), air quality, noise, soils, hydrology, water quality, land use, utilities, traffic and recreation.

Avoidance conditions and mitigation measures will be developed to avoid or reduce potentially significant environmental effects.

Possible environmental effects that may be addressed at each of the sites are as follows:

Merigan Ranch
Cultural resources, land use, sensitive plants, visual resources (aesthetics), air quality, noise, soils, hydrology, water quality, utilities, recreation, and traffic

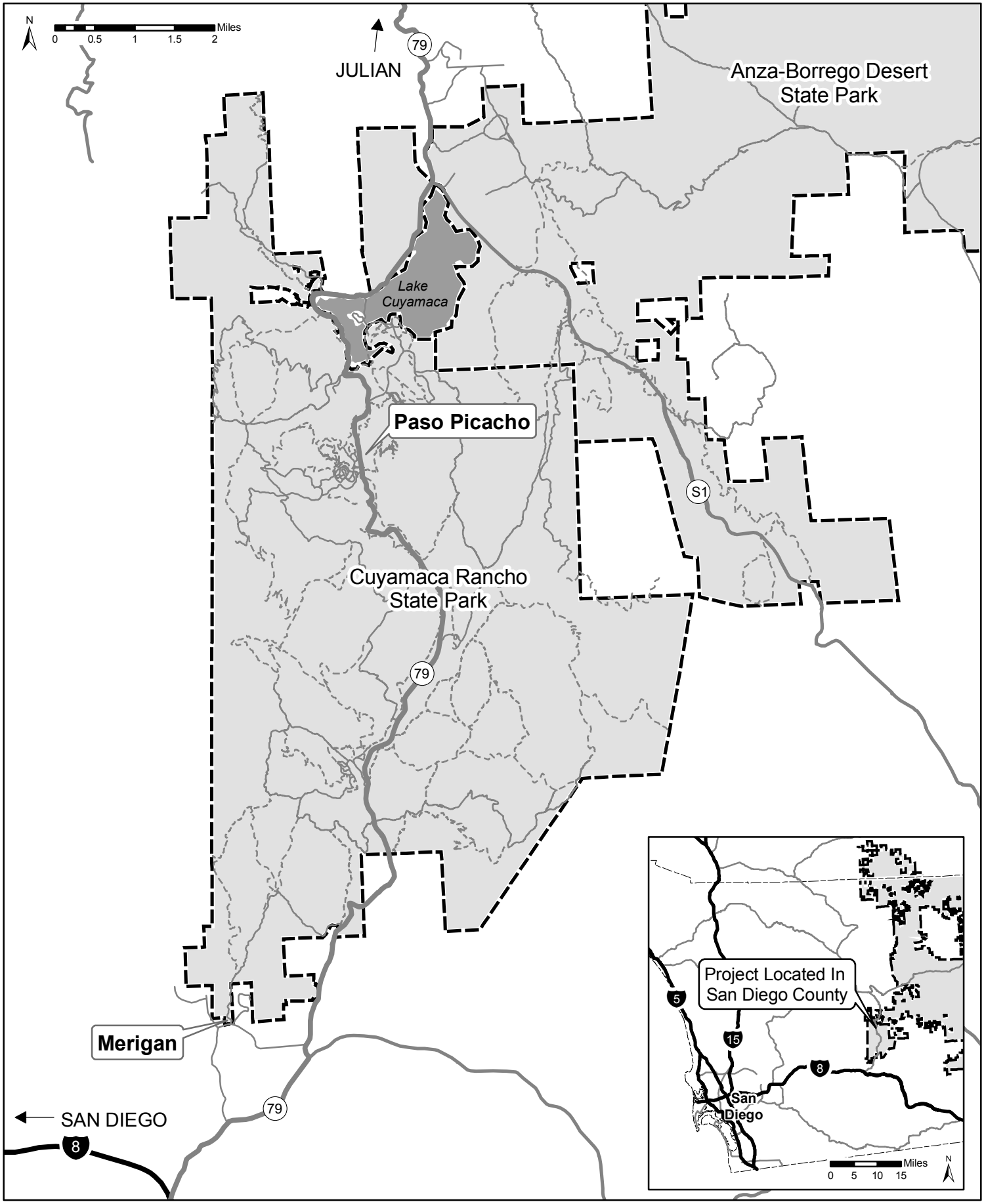
Paso Picacho
Cultural resources, land use, visual resources (aesthetics), sensitive plants, soils, hydrology, utilities, traffic, and recreation

INTENDED USE OF THE CEQA DOCUMENT: The CDPR intends to use the CEQA document for consideration of the environmental effects and mitigation measures when reviewing the proposed project for approval. The EIR will serve as CDPR's CEQA compliance document, as well as serve responsible agencies in the future for any subsequent discretionary actions under their jurisdiction required for implementation of the project.

Attachments: Project Location Map

CALIFORNIA STATE PARKS
SOUTHERN SERVICE CENTER
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

PROJECT LOCATION MAP
EQUESTRIAN FACILITIES



EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers, except "No Impact", that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact does not apply to the project being evaluated (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on general or project-specific factors (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must consider the whole of the project-related effects, both direct and indirect, including off-site, cumulative, construction, and operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether that impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate when there is sufficient evidence that a substantial or potentially substantial adverse change may occur in any of the physical conditions within the area affected by the project that cannot be mitigated below a level of significance. If there are one or more "Potentially Significant Impact" entries, an Environmental Impact Report (EIR) is required.

4. A "Mitigated Negative Declaration" (Negative Declaration: Less Than Significant with Mitigation Incorporated) applies where the incorporation of mitigation measures, prior to declaration of project approval, has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact with Mitigation." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR (including a General Plan) or Negative Declaration [CCR, Guidelines for the Implementation of CEQA, § 15063(c)(3)(D)]. References to an earlier analysis should:

   a) Identify the earlier analysis and state where it is available for review.

   b) Indicate which effects from the environmental checklist were adequately analyzed in the earlier document, pursuant to applicable legal standards, and whether these effects were adequately addressed by mitigation measures included in that analysis.

   c) Describe the mitigation measures in this document that were incorporated or refined from the earlier document and indicate to what extent they address site-specific conditions for this project.

6. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist or appendix (e.g., general plans, zoning ordinances, biological assessments). Reference to a previously prepared or outside document should include an indication of the page or pages where the statement is substantiated.

7. Explanation(s) of each issue should identify:

   a) the criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question and

   b) the mitigation measures, if any, prescribed to reduce the impact below the level of significance.

ENVIRONMENTAL (INITIAL STUDY) CHECKLIST

I. BACKGROUND INFORMATION

Project Title: Cuyamaca Rancho State Park Equestrian Facilities Project **Project ID# 13360**
PCA# 10600

Contact Person: Brina Carey **Telephone: (619) 220-5300**
Location: Cuyamaca Rancho State Park in San Diego County
Checklist Date: 5/11/07

Project Description: The proposed project would provide a new equestrian family and group campground with day-use facilities and overnight parking in the southern portion of Cuyamaca Rancho State Park. The proposed project would also provide permanent equestrian staging facilities located across State Route 79 from the Paso Picacho family campground.

II. ENVIRONMENTAL CHECKLIST

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
1. AESTHETICS.				
ISSUES				
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☒	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

COMMENTS

a-c) The Merigan campground portion of the project is located within the unincorporated town of Descanso. The site is currently an open field along the roadside of Viejas Blvd. and is visible from businesses and residences in the area, as well as the neighboring school. Converting the site will affect the viewshed, during and post construction. Restrooms, shade ramadas, storage facilities, roads, corrals, round pens, arenas, manure bins, high lines and other ammenities will need to be constructed to accommodate park visitors. This will permanently affect the open nature of the field and views across it. Many residences currently have equestrian facilities on their property which are also visible from the road and school. The viewshed from the road may change due to an increase in trees and other vegetation planted as landscape. Viejas Blvd. has been classified as a third priority scenic route in the Scenic Highway Element of the San Diego County General Plan. The potential for significant impacts to scenic vistas, the visual character, and nighttime views of the area as a result of implementing the project will be evaluated in the EIR. The equestrian staging portion of the project will require the removal of trees in order to widen State Route 79 for a deceleration lane, this will require a permit from Caltrans. Some trees may need to be removed to create room for parking. This project may degrade the scenic view from the highway. State Route 79 has been classified as a first priority scenic route in the San Diego County General Plan.

d) Security and other lighting will be put in near the restrooms, pathways, and other facilities. Vehicles entering or departing the park at night will also create a new source of light. An additional description will be available in the EIR.

PROPOSED MITIGATION

The project should incorporate a visual buffer around the campground, which may include native trees and shrubs, earthen berms, boulders, and rustic style ranch fencing, among other items.

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT

2. AGRICULTURAL RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model for use in assessing impacts on agricultural and farmland. Would the project:

ISSUES

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☒	☐	☐	☐
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☒	☐
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	☐	☐	☒	☐

COMMENTS:

a-c) The property was farmed formerly but now is in park ownership and not actively farmed. The proposed Merigan campground will utilize the former agricultural fields and landscape trees will be planted. This action would alter the site and make it unsuitable for farming, but the property is currently fallow and will remain in park use regardless of whether or not the project is approved. It would change from a passive park use to an actively used and developed park area with little or no effect on existing agricultural resources and production. However, the campground site is Farmland of Local Importance and would be removed from the rapidly diminishing agricultural land available in San Diego County.

PROPOSED MITIGATION

No mitigation is proposed

3. AIR QUALITY.

ISSUES

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan or regulation?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations (e.g., children, the elderly, individuals with compromised respiratory or immune systems)?	☐	☒	☐	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

COMMENTS:

a) The project will increase vehicle trips and barbeque/wood fires and their associated air pollution but the amount is insignificant when compared to the vehicle trips and daily combustable use within in the San Diego Air Basin.

b-d) The Merigan campground location, in particular, is sandy and substantial dust (PM10 and PM 2.5) may be raised during construction and operational activities. Water trucks or sprinklers may be necessary to keep the dust down during construction and prior to daily equestrian activities at the campground.

e) The presence of an equestrian campground has the potential for objectionable odors due to large numbers of horses being present and the smell of their waste. The site will be self-contained but some odors may drift to neighboring properties. The potential impact is somewhat lessened by the pre-existing presence of horses and livestock on nearby properties.

PROPOSED MITIGATION

Both during project operations and project construction, specific guidelines for dust control will be implemented to prevent, or reduce below significance, the spread of contaminant dust both on and off the site. Additional mitigation may be proposed prior to the approval of the project subject to the planning and public review process.

4. BIOLOGICAL RESOURCES.

ISSUES

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a sensitive, candidate, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands, as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

COMMENTS:

Several sensitive species of flora and fauna are known to occur within Cuyamaca Rancho State Park and could potentially be impacted by the project. Surveys are in progress to determine the full extent and significance of the impacts to sensitive species, habitat, and wetlands and will be detailed in the EIR. It is the intention of the California Department of Parks and Recreation (CDPR) to mitigate the adverse effects on these resources to the fullest extent feasible.

a) There are several species in the park which are either state or federally listed. Surveys are being conducted to determine whether these species occur within the project boundaries.

b) The Sweetwater River and Descanso Creek are in the vicinity of the Merigan campground project and the equestrian staging area is located near Cold Stream. Appropriate Best Management Practices (BMPs) will be put into place to avoid unnecessary damage or disturbance to these project sites.

c) Surveys are being conducted to determine the potential for wetland areas to exist within the proposed area. Based on recent surveys, the likelihood for wetland areas to exist is unlikely. Additional information will be included in the EIR.

d) The project may interfere with movement of native species. The Merigan campground site is potential habitat for Arroyo toad dispersal; however there is no breeding habitat at this site. Further studies will be conducted to determine this and potential impacts and mitigation will be discussed in the EIR.

e-f) The proposed project will not conflict with any local policies or ordinances protecting biological resources. San Diego County is in the process of preparing a Multiple Species Conservation Program (MSCP) Plan for the East County, which would include the areas of Descanso and Cuyamaca. The MSCP Plan has not yet been finalized or adopted. The County does not have authority over lands owned by the State of California, however, CDPR can participate in the MSCP Plan on a voluntary basis.

PROPOSED MITIGATION

Potentially significant resources will be avoided wherever possible through sensitive design and construction; impacts to resources that cannot be avoided, will be mitigated. The design and proposed mitigation will be detailed in the EIR.

5. CULTURAL RESOURCES.

ISSUES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource, as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to§15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
d) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?	☐	☐	☐	☒

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT

COMMENTS:

Cuyamaca Rancho State Park is rich in historical and archaeological resources. Surveys will be conducted to identify cultural features and determine the significance of impacts to these sites.

a) There are some culturally significant features in the vicinity of the project areas. These features will not likely be impacted by the proposed projects.

b-c) There is a large number of known archaeological resources within the park and cultural resource specialists will examine the project sites to conclude whether there are any unknown sites. With the implementation of grading for facilities, there is a slight chance of disturbing unknown buried resources. The Merigan site has been previously disturbed due it its use as an agricultural field. Additionally, some project locations are close to known archaeological sites and sacred sites. Design avoidance and mitigation will be detailed in the EIR.

d) Due to limited anticipated grading, primarily in recent sedimentary soils, it is not expected that there would be significant adverse effects to paleontological resources.

PROPOSED MITIGATION

CDPR will avoid known cultural features and ,should an unknown underground resource be discovered, work will shift from that area until a qualified cultural resource specialist can evaluate the discovery. Additional mitigation and avoidance measures will be developed and incorporated in the EIR.

6. GEOLOGY AND SOILS.

ISSUES

Would the project:

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area, or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable, as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☐	☒

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available for the disposal of waste water?	☐	☒	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?	☐	☐	☒	☐

COMMENTS:

a) The project is located in Southern California, an area known for seismic activity. It is not anticipated that construction of the projects would expose people or property to a high risk of danger due to seismic activity, although the risk of a landslide in the event of a catastrophic seismic event cannot be completely eliminated. The project will require some grading and landform changes but the risk of substantial adverse effects will be eliminated through proper engineering and site design. The sites to be graded are mostly flat, however during construction and until revegetated slopes mature, the project will have greater risk of soil erosion and landslides. The use of appropriate BMPs to support these areas will be proposed in the EIR.

b) The park generally has highly erodable surface soils. Soil surveys will be conducted before the development of the new facilities. High levels of visitor and equine use may increase loss of topsoil.

c-d)The soil at the Merigan campground site is sandy and will need to be compacted prior to construction.

e) A septic system that operates to Regional Water Quality Control Board standards will be utilized.

f) It is not expected that there would be significant adverse effects to paleontological resources due to the soil horizon that would be disturbed by grading. An evaluation will be made as part of the EIR.

PROPOSED MITIGATION

The use of appropriate BMPs to support areas with a risk of soil erosion or landslides will be proposed in the EIR.

7. HAZARDS AND HAZARDOUS MATERIALS.

ISSUES

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment?	☐	☐	☐	☒

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Be located in the vicinity of a private airstrip? If so, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death from wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☒	☐	☐

COMMENTS:

a-b) The transport of hazardous materials is not anticipated for this project.

c) The proposed Merigan campground site is in close proximity to a school and residences. During the construction phase there may be emissions from construction equipment. Dust may be raised during construction and operational activities and as a result of daily equestrian activities.

d) The project sites are not hazardous materials sites.

e-f) The proposed project sites are not located in the vicinity of airports or private airstrips.

g) During an emergency evacuation, traffic may increase due to high visitation at the campground or equestrian staging areas.

h) The park is prone to wildfires and an increase of visitors could increase the fire hazard.

PROPOSED MITIGATION

A hose or sprinkler system will need to be implemented to minimze dust level in the campground. Park rangers will evacuate the park or limit campfire activities during times of high risk from wildfires.

8. HYDROLOGY AND WATER QUALITY.

ISSUES

Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐

		POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
c)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?	☐	☐	☒	☐
d)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?	☐	☐	☒	☐
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
f)	Substantially degrade water quality?	☐	☒	☐	☐
g)	Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map?	☐	☐	☐	☒
h)	Place structures that would impede or redirect flood flows within a 100-year flood hazard area?	☐	☐	☒	☐
i)	Expose people or structures to a significant risk of loss, injury, or death from flooding, including flooding resulting from the failure of a levee or dam?	☐	☐	☐	☒
j)	Result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

COMMENTS:

There are rivers, streams, and wells in the vicinity of the project sites, as well as seasonally wet meadows. The project will not construct facilities in such a way as to cause substantial environmental damage.

a) A Storm Water Pollution Prevention Plan (SWPPP) will be required for this project to identify potential sources of pollution and practices to reduce waste discharge.

b) While the project will result in increased use of water comsumption, an impact to groundwater supplies is not anticipated.

c-d) Grading will be minor and not substantially alter drainage patterns. If trails are constructed to incorporate creek or stream crossings there may be impacts. Additional information, design measures, and mitigation will be further identified in the EIR.

e-f) Use of the equestrian facilities will result in higher than normal levels of water consumption, well impacts, deposit of animal waste, and may increase runoff into streams and creeks. An increase in impervious and compacted soils may result in higher levels of runoff.

g-i) The project will not be within a 100-year flood hazard area or expose people or structures to risk as a result of flooding.

j) Due to its location, the project is not likely to result in inundation by seiche, tsunami, or mudflow.

PROPOSED MITIGATION

A hydrology and water quality study is being completed and the results will be included as part of the EIR. The project will require a SWPPP and conformance with accepted BMPs for water quality and stormwater runoff. BMP's will be

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT

incorporated in the design of facilities. Manure will be cleaned up regularly and managed on site or removed to appropriate disposal locations. The EIR will contain additional design and evaluation of potential water quality issues.

9. LAND USE AND PLANNING.

ISSUES

Would the project:

a) Physically divide an established community?	☐	☒	☐	☐
b) Conflict with the applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐

COMMENTS:

a) The Merigan campground portion of the proposed project is located within a portion of the Park that extends into the County of San Diego unincorporated community of Descanso. It is also located adjacent to a school and across from several equestrian related businesses. Many of the residents in this section of Descanso keep horses and livestock on their property but some rural homes are without livestock. The introduction of the campground and its users will create a change in this portion of Descanso with increased activity, noise, traffic, and lights. This change may serve as a beneficial focal point for some members of the community, primarily those that would seek to utilize the amenities at the campground, but may serve to alienate other residents.

b) The proposed project is consistent with the Cuyamaca Rancho State Park General Plan. Access to the road by the campground, however, is under the jurisdiction of the County of San Diego, as are the neighboring school and privately owned properties. CDPR is not aware of any conflicts with local zoning and will coordinate with the County of San Diego in the implementation of this project. CDPR will also coordinate with school officials to reduce or eliminate potential traffic and noise impacts to the school from construction or operation of the campground.

c) CDPR will coordinate, during the course of this project, with all appropriate resource agencies and the County of San Diego to ensure that the project is in conformance with any applicable planning efforts.

PROPOSED MITIGATION

CDPR will hold at least one public meeting in the community of Descanso to involve the public in the planning process for the campground and other equestrian facilities. Additionally, CDPR will coordinate with all appropriate resource agencies and the County of San Diego to ensure that the project is in conformance with any applicable planning efforts. Additional mitigation may be proposed or implemented during the planning and public review process prior to project approval.

10. MINERAL RESOURCES.

ISSUES

Would the project:

a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state?	☐	☐	☐	☒

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

COMMENTS:

a-b) The site contains sandy soil but no other known resources. The site is currently owned by CDPR and would not be subject to mining for mineral resources.

PROPOSED MITIGATION

None proposed

11. NOISE.

ISSUES

Would the project:

a) Generate or expose people to noise levels in excess of standards established in a local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☒	☐	☐
b) Generate or expose people to excessive groundborne vibrations or groundborne noise levels?	☐	☒	☐	☐
c) Create a substantial permanent increase in ambient noise levels in the vicinity of the project (above levels without the project)?	☒	☐	☐	☐
d) Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project?	☒	☐	☐	☐
e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) Be in the vicinity of a private airstrip? If so, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

COMMENTS:

a-b) Primarily during construction, the project would increase noise levels from equipment and tools used for construction. There are sensitive receptors located immediately adjacent to the campground site and both day-use sites. A school and homes are located next to the campground site and the southern day-use site. The Paso Picacho campground and park employee facilities are located near the northern day-use site. Additionally, if large trucks are required to bring equipment to the site, there would be an increase in noise along the sites' access roads. It is anticipated that construction near these sensitive receptors could be limited to after 7 AM and before 7 PM

c-d) The proposed project will create both a permanent and temporary increases in the ambient noise levels. These noises will include the ingress and egress of vehicles to the facilities, the loading and unloading of horses and other livestock, and converstions between people at each location. Special events could increase these levels on a temporary basis and are subject to CDPR approval.

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT

e-f) there is no airstrip near the project sites.

PROPOSED MITIGATION

It is anticipated that work near sensitive noise receptors would be limited to after 7 AM and before 7 PM.

12. POPULATION AND HOUSING

ISSUES

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

COMMENTS:

The project is located fully within the park property and no home would be displaced or built.

PROPOSED MITIGATION

N/A

13. PUBLIC SERVICES.

ISSUES

Would the project:

a) Result in significant environmental impacts from construction associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	☐	☒	☐	☐
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
CDPR?	☐	☒	☐	☐
Other public facilities?	☐	☐	☒	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT

COMMENTS:

The project is a government (park) project and would require additional staff and other long-term financial commitments for maintenance and operations. The cost would be partially offset by camping fees or other use fees. Park rangers supply law enforcement and The California Department of Forestry (CDF) provides fire protection to park users. Assistance could be required from agencies such as CDF or local law enforcement. The campground and southern day-use will be adjacent to a school but should not require additional service from the school except for the potential children of one or two new employees needed for park operations. The potential for activities at the campground to disrupt school activities exists due to the new source of noise and human activity. There should be a visual and noise buffer between the campground and school. A nominal amount of new public services such as trash, water, and electricity will be required for the campground and southern day-use area.

PROPOSED MITIGATION

The project design should incorporate a visual and noise buffer or berm between the proposed campground and the school.

14. RECREATION.

ISSUES

Would the project:

a) Increase the use of existing neighborhood and regional CDPR or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☒	☐	☐

COMMENTS:

a-b) Implementation of the project will improve the equestrian recreational experience. The project could lessen impacts to other existing equestrian facilities in the region. The project may affect existing recreational use patterns by proposing to create new facilities at a new location within the park and improve existing facilities focused on one user group at the park. There may be concerns from non-equestrian user groups because the proposed facilities are equestrian focused. There is potential, however, for the community to utilize the facilities at the proposed Merigan campground site for non-equestrian activities. Proximity to Interstate 8 and the town of Descanso will allow for the campground facilities to be accessed with ease, therefore park visitation may increase. The project may also result in increased visitation to the adjacent community park thereby accelerating deterioration.

PROPOSED MITIGATION

During times of heavy use or special events, increased staffing may be required.

15. TRANSPORATION/TRAFFIC

ISSUES

Would the project:

a) Cause a substantial increase in traffic, in relation to existing traffic and the capacity of the street system (i.e., a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☒	☐	☐	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
b) Exceed, individually or cumulatively, the level of service standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Cause a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	☐	☐	☐	☒
d) Contain a design feature (e.g., sharp curves or a dangerous intersection) or incompatible uses (e.g., farm equipment) that would substantially increase hazards?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Result in inadequate parking capacity?				
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☒	☐

COMMENTS:

a-e) The project will increase vehicle miles traveled in a nominal amount when compared to the traffic volumes in the region and on the nearby roadways. The project will, however, increase the types of large vehicles towing horse trailers in the immediate area of the campground and southern day-use area. These vehicles are slow moving and can cause increased traffic queues, especially on weekends and holidays or during special events. A mitigating factor is that the Merigan campground is not far from Interstate 8.

f)The existing day-use parking for equestrian staging is inadequate in both the northern and southern portions of the Park and the project should improve parking. A new driveway will provide better access into the southern day-use area. The northern day-use area will be constructed to Caltrans' requirements to allow safe ingress and egress onto State Highway 79.

g) The project does not provide for alternative transportation such as bicycle racks or bus turnouts since it is an equestrian facility - however, trail connections to the local community could allow for walking or equestrian access to the campground facility.

PROPOSED MITIGATION

During construction and special events, traffic control may be required.

16. UTILITIES AND SERVICE SYSTEMS.

ISSUES

Would the project:

a) Exceed wastewater treatment restrictions or standards of the applicable Regional Water Quality Control Board?	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities?	☐	☒	☐	☐
Would the construction of these facilities cause significant environmental effects?	☐	☒	☐	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities?	☐	☐	☒	☐
Would the construction of these facilities cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?	☐	☒	☐	☐
e) Result in a determination, by the wastewater treatment provider that serves or may serve the project, that it has adequate capacity to service the project's anticipated demand, in addition to the provider's existing commitments?	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations as they relate to solid waste?	☐	☒	☐	☐

COMMENTS:

To facilitate the project, permanent infrastructure will need to be installed. A septic system and new utility connections would be installed at the Merigan campground. Septic systems will comply with the standards appropriate for the area. An RV waste station dump site will be provided as well as water and electrical hookups for RVs. Storm water or drainage facilities would be constructed as part of the project. A watering system will need to be implemented to reduce dust impacts at the campground. Trash and manure will be collected frequently. Manure may be composted to avoid impacts to the local landfill. Additional information, design measures, and mitigation will be further identified in the EIR.

PROPOSED MITIGATION

Avoidance or relocation of any existing utility easements may be required. Additional information, design measures, and mitigation will be further identified in the EIR.

III. MANDATORY FINDINGS OF SIGNIFICANCE.

Would the project:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal?	☐	☒	☐	☐
b) Have the potential to eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
c) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probably future projects?)	☒	☐	☐	☐

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly?	☐	☒	☐	☐

COMMENTS:

a-b) The proposed project sites are in areas which have sensitive cultural and natural resources. California Department of Parks and Recreation (CDPR) will survey these areas and avoid areas known to have significant or sensitive resources. The full extent and significance of impacts to cultural resources, sensitive species, habitat, and wetlands will be detailed in the EIR. It is the intention of CDPR to mitigate any adverse effects to these resources to the fullest extent feasible.

c) The proposed projects will have cumulative impacts on Cuyamaca Rancho State Park as well as on the towns and residents nearby. The Merigan campground site and the equestrian staging area will allow for a greater capacity of park visitors to utilize the park and may ultimately result in impacts such as increased use of park-wide trail connections and a rise in traffic, which would include big rigs, rv's, and trailers. Aside from the proposed Equestrian Facilities projects, there are also other projects being developed or proposed for development within and surrounding the park. These include Federal Emergency Management Agency (FEMA) projects from the 2003 Cedar Fire, Americans with Disabilities Act (ADA) improvements and upgrades, trail connections, and projects being developed in neighboring towns. An increase in facilities and trails would intensify visitation at other locations within the park as well as surrounding towns and businesses.

d) The proposed Equestrian Facilites projects may result in some impacts to humans, especially in the neighboring town of Descanso. The proposed Merigan campground site is in the vicinity of a school, businesses, and residences. There will be high levels of visitation and recreational use at this site and as a result of this there may be more noise, an increase in water and utility usage, a decrease in air and water quality, and aesthetic impacts, among other things. However, the project is not considered to have substantial adverse impacts to humans. A further assesment of these impacts will be detailed in the EIR.

IV. PRELIMINARY DETERMINATION

On the basis of the Initial Study,

☐ I find that the proposed project could not have an adverse effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect because the mitigation measures described in the attached Mitigation appendix will be required. A NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project may have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

PREPARER: Brina Carey

TITLE: Park and Recreation Specialist **DATE: 5/11/07**

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Carlsbad, California 92011
(760) 431-9440
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California Department of Fish & Game
South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
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In Reply Refer To:
FWS-SDG-4913.3

JUL 11 2007

Ms. Karen Miner
Project Manager
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, California 92108

Subject: Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Proposed Equestrian Facilities Project, Cuyamaca Rancho State Park, San Diego County, California (SCH# 2007051074)

Dear Ms. Miner:

The U.S Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) dated May 11, 2007. Subsequent to our receipt of the NOP, we received a notification from the State Clearinghouse, dated May 17, 2007, that the review period for the NOP was extended by the California Department of Parks and Recreation (Parks) to July 11, 2007. The Wildlife Agencies have identified potential effects of this project on wildlife and sensitive habitats. The comments provided herein are based on the information provided in the NOP, our knowledge of sensitive and declining vegetation communities, and our participation in regional conservation planning efforts.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program.

The proposed project would establish new equestrian facilities near the community of Descanso in the southern portion of Cuyamaca Rancho State Park, including a campground with approximately 20 individual campsites, comfort station, horse corrals, landscape and tree plantings, as well as day-use amenities, and staging area. Additionally, the project proposes to construct permanent day-use equestrian staging near Paso Picacho that would accommodate approximately eight truck and trailer

rigs and establish connecting trails to these facilities where needed. New trails and/or trail connections to existing trails, including the California Riding and Hiking Trail, will be developed as part of the project.

The Wildlife Agencies' primary concern regarding the proposed project is the potential for impacts to a number of sensitive wildlife and plant species, their habitat, and the long-term conservation of those species, specifically the arroyo toad (*Bufo californicus*: federally endangered), the least Bell's vireo (*Vireo bellii pusillus*: federally endangered), Parish's meadowfoam (*Limnanthes gracilis* ssp. *parishii*: State endangered), Cuyamaca larkspur (*Delphinium hesperium* ssp. *cuyamacae*: State rare), and Cuyamaca Lake downingia (*Downingia concolor* ssp. *brevior*: State endangered). Additionally, we are concerned by the fact that both of the proposed project sites are located in the vicinity of creeks and/or rivers where impacts to riparian areas may occur.

We offer our comments and recommendations in the attached enclosure to assist Parks in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources. In summary, our comments address the following issues: (1) compliance with CEQA, ESA, and CESA; (2) protocol-level species surveys for listed species with potential to occur in the project area; (3) the requirement for a Streambed Alteration Agreement from the Department if the project will result in substantial direct impacts to adjacent streams; (4) analysis of the potential effects of runoff into adjacent streams; (5) use of only native and non-invasive plant species in the landscape and shade tree plantings at the campground; and (6) general information to be included in the DEIR.

We appreciate the opportunity to comment on this NOP. If you have questions or comments regarding this letter, please contact Meredith Osborne of the Department at (858) 636-3163 or Cara McGary of the Service at (760) 431-9440.

Sincerely,

For Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

For Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

Enclosure(s) 3

- Wildlife Agency Comments
- Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities
- Sensitivity of Top Priority Rare Natural Communities in Southern California

cc: State Clearinghouse

Wildlife Agency Comments and Recommendations on the Notice of Preparation of a DEIR for the Proposed Equestrian Facilities Project, Cuyamaca Rancho State Park

Specific Comments

1. Take authorization pursuant to CESA and the federal ESA must be obtained if the project has the potential to result in "take" of state and/or federally listed species of plants or animals (e.g., arroyo toad, least Bell's vireo, Parish's meadowfoam, Cuyamaca larkspur and Cuyamaca Lake downingia) either during construction or over the life of the project. Permits authorizing take are issued to conserve, protect, enhance, and restore listed threatened or endangered species and their habitats. Early consultation is encouraged, as modification to the project and mitigation measures may be required in order to obtain take authorization. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to state listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

2. To guide project planning to avoid/minimize impacts to listed species and other sensitive species, we recommend that protocol-level surveys be conducted for any such species with the potential to occur within the project site. Surveys should be performed no more than one year prior to an application for a permit from the Wildlife Agencies, and the DEIR should include the survey results.

3. The Department will require a Streambed Alteration Agreement, pursuant to Section 1600 *et seq.* of the Fish and Game Code, with the applicant prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a Lake or Streambed Alteration Agreement for a project that is subject to the California Environmental Quality Act (CEQA) requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the Lead Agency's CEQA documentation for the project. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the final document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A Streambed Alteration Agreement notification form may be obtained by writing to the Department of Fish and Game, 4949 Viewridge Avenue, San Diego, California 92123-1662, or by calling (858) 636-3160, or by accessing the Department's web site at http://www.dfg.ca.gov/1600.

4. The DEIR should provide information on the potential indirect impacts to the adjacent and downstream riparian and aquatic habitats from changes in hydrology resulting from the

proposed project. The DEIR should also discuss the potential for contamination from surface runoff from both the staging area and the campground.

5. The Wildlife Agencies recommend the use of native plants to the greatest extent feasible in the landscape areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed or otherwise introduce invasive exotic plant species to the landscaped areas adjacent and/or near mitigation/open space area and/or wetland/riparian areas. Exotic plant species not to be used include those species listed on Lists A & B of the California Invasive Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999.' This list includes such species as: pepper trees, Tasmanian blue gum eucalyptus, myoporum, black locust, tree of heaven, pampas grass, fountain grass, ice plant, capeweed, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained by contacting the California Invasive Plant Council at 1442-A Walnut St. #462, Berkeley, CA 94709, or by accessing their web site at http://www.cal-ipc.org.

General Comments

To enable the Wildlife Agencies to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, wildlife, and other biological resources, we recommend the following information be included in the DEIR.

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

2. Analyses of a range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity, where appropriate.

3. A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis on identifying state and federally listed endangered, threatened, rare, or proposed candidate species, California Species of Special Concern and/or Protected or Fully Protected species, and locally unique species and sensitive habitats. Specifically, the DEIR should include the following.

   a) Discussions regarding the regional setting, pursuant to CEQA Guidelines, § 15125(c), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.

b) A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Enclosure 2, revised May 2000).

c) A current inventory of the biological resources (to include rare, threatened, and endangered as defined by CEQA Guidelines, §15380, and other sensitive species) associated with each habitat type on site and within the area of potential effect. This should include sensitive fish, wildlife, reptile, and amphibian species. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

d) Discussions regarding seasonal variations in use of the project area and vicinity by sensitive species, and acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. The results of focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Wildlife Agencies.

4. A thorough discussion of direct, indirect, and cumulative project-related impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DEIR should include the following.

a) Specific acreages and descriptions of the types of wetlands, coastal sage scrub, and other habitats that would potentially be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.

b) Detailed discussions, including both qualitative and quantitative analyses, of potential direct effects on listed and other sensitive species (fish, wildlife, plants) and their habitats within the area of impact of the proposed and alternative projects.

c) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any proposed or existing reserve lands.

i) Impacts to wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated.

ii) Discussions of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion

and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

iii) If applicable, a discussion of the effects of any project-related dewatering or ground water extraction activities to the water table and the potential resulting impacts on the wetland/riparian habitat, if any, supported by the surface and groundwater.

d) Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats.

e) A thorough discussion assessing the consistency of this project with regional conservation planning efforts.

f) A cumulative effects analysis as described under CEQA Guidelines, § 15130, assessing the impacts of the proposed project in conjunction with past, present, and anticipated future projects, relative to their impacts on native plant communities and wildlife.

5. A thorough discussion of mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Specifically, the DEIR should include/address the following.

a) Mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Measures to fully avoid and otherwise protect Rare Natural Communities (Enclosure 3) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

b) Where avoidance is infeasible, mitigation measures that emphasize minimization of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable (e.g., it would not adequately mitigate the loss of biological functions and values), off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The Wildlife Agencies generally do not encourage the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown these efforts are experimental in nature and do not provide for the long-term viability of the target species.

c) Mitigation measures to alleviate indirect project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.

d) Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open

space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.

e) A requirement that a Wildlife Agency-approved biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the Lead Agency and the Wildlife Agencies.

f) Plans for restoration and revegetation, to be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria (e.g., percent cover of native and non-native species; species richness); (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

g) Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect adverse impacts. These should include a legal mechanism (e.g., conservation easement) by which the mitigation areas would be preserved in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals, particularly cats. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.

h) Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site biological open space easements, if applicable. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR) should be completed to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available on an annual

basis to implement the MMP. A draft MMP, PAR results, and proposed funding mechanism should be submitted to the Wildlife Agencies for review and approval prior to initiating construction activities; the final plan should be submitted to the Wildlife Agencies within 90 days of receiving approval of the draft plan.

i) To avoid impacts to nesting birds, the DEIR should require that all clearing and grubbing occur outside the avian breeding season. The general breeding season for nesting birds occurs approximately February 15 through September 15; however raptors may begin breeding as early as January. If project construction, other than clearing and grubbing, is necessary during the avian breeding season, a qualified biologist should conduct a survey for nesting birds within three days prior to the work in the area to ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. Unless site-specific conditions warrant a reduction, we recommend a minimum width of 300 feet (500 feet for raptors) be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be affected by the construction.

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

a. Experience conducting floristic field surveys;
b. Knowledge of plant taxonomy and plant community ecology;
c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project

area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.

c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.

e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:

a. Project description, including a detailed map of the project location and study area.
b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
c. Detailed description of survey methodology.
d. Dates of field surveys and total person-hours spent on field surveys.
e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
h. Recommended measures to avoid impacts
i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
l. Name of field investigator(s).
m. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.

S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh
S1.2	Southern Foredunes
	Mono Pumice Flat
	Southern Interior Basalt Flow Vernal Pool

S2.1	Venturan Coastal Sage Scrub Diegan Coastal Sage Scrub Riversidean Upland Coastal Sage Scrub Riversidean Desert Sage Scrub Sagebrush Steppe Desert Sink Scrub Mafic Southern Mixed Chaparral San Diego Mesa Hardpan Vernal Pool San Diego Mesa Claypan Vernal Pool Alkali Meadow Southern Coastal Salt Marsh Coastal Brackish Marsh Transmontane Alkali Marsh Coastal and Valley Freshwater Marsh Southern Arroyo Willow Riparian Forest Southern Willow Scrub Modoc-Great Basin Cottonwood Willow Riparian Modoc-Great Basin Riparian Scrub Mojave Desert Wash Scrub Engelmann Oak Woodland Open Engelmann Oak Woodland Closed Engelmann Oak Woodland Island Oak Woodland California Walnut Woodland Island Ironwood Forest Island Cherry Forest Southern Interior Cypress Forest Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes Active Desert Dunes Stabilized and Partially Stabilized Desert Dunes Stabilized and Partially Stabilized Desert Sandfield Mojave Mixed Steppe Transmontane Freshwater Marsh Coulter Pine Forest Southern California Fellfield White Mountains Fellfield
S2.3	Bristlecone Pine Forest Limber Pine Forest

ERIC GIBSON
INTERIM DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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July 11, 2007

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COMMENTS ON THE NOTICE OF PREPARATION FOR THE CALIFORNIA STATE PARKS EQUESTRIAN FACILITIES PROJECT

The County of San Diego has received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) for the Equestrian Facilities Project dated May 11, 2007, received on June 20, 2005 and appreciates this opportunity to comment. In response to the document the County, as a responsible agency under CEQA Section 15381, has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County, reasonable alternatives and mitigation measures that the County recommends be evaluated in the environmental document.

The County Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and Department of Environmental Health (DEH) staff have completed its review and have the following comments regarding the content of the above documents:

GENERAL COMMENTS

1. The County recommends exploring an alternative location for the proposed Merigan campground due to potentially significant impacts that could result from constructing the project at this location. While the County values the

recreational and equestrian amenities that this project would provide, there is concern that the proposed location of the campground and equestrian staging area at the Merigan site would have significant impacts to the rural, unincorporated community of Descanso. To avoid and/or minimize the impacts to the community of Descanso and to the elementary school adjacent to the Merigan site, alternative locations for the project components at Merigan should be fully explored in the EIR. Given the large size of Cuyamaca State Park, identifying an alternative location that would reduce impacts should be feasible.

AESTHETICS

2. The proposed campground at the Merigan site is located directly adjacent to the Descanso Elementary school and rural residential uses in the community of Descanso. The proposed equestrian uses and campground at the Merigan site may significantly impact the visual character and quality of the site and its surroundings. The project may also impact scenic vistas in the area, including views from Highway 79, a first priority scenic route identified in the County of San Diego General Plan. The NOP recognizes this potential impact and suggests a visual buffer may mitigate these potential impacts. The County suggests that the EIR also evaluate the availability of alternative sites for the proposed campground as a means to avoid significant impacts to scenic vistas and to the visual character and quality of the rural community of Descanso.

AIR QUALITY

3. The proposed campground at the Merigan site is located directly adjacent to the Descanso Elementary school and residential uses, both of which are considered as sensitive receptors. The project could increase emissions of criteria pollutants during construction and as part of ongoing operations. The proposed equestrian and campground facilities could increase airborne dust and increase exposure of particulate matter to sensitive receptors. The EIR should evaluate the project's potential impact to sensitive receptors and the direct and cumulative increase of particulate matter emissions for a basin which is currently in non-attainment for particulate matter. The EIR should fully evaluate all potential emissions of criteria pollutants and air quality impacts to sensitive receptors, including diesel particulate emissions from construction and from the traffic generated by the project.

BIOLOGICAL RESOURCES

4. The County of San Diego is currently developing the East County Multiple Species Conservation Plan (ECMSCP). This is a 50-year plan to conserve approximately 156 species and to streamline development in the eastern portion of the unincorporated County. The ECMSCP will apply to the unincorporated areas adjacent to and surrounding much of the California State Parks proposed project area. The County requests that habitat connections

from the State Park to the ECMSCP planned preserve be considered in the development of the California State Parks proposed Equestrian Facilities Project. In addition, the County requests that all information regarding the potential environmental impacts of the project, particularly impacts to sensitive plant or animal species, be provided to the County for consideration in the context of the ECMSCP.

CULTURAL RESOURCES

5. Recorded archaeological sites are located in the Merigan Ranch area (SDI-8855, SDI-8297 and SDI-18119). Numerous surveys have also been done, many in the 1980s and early 1990s; some reports are more recent such as the Hector survey in 2006. Previous surveys should be reviewed for adequacy and a field survey is recommended to identify the location of previously surveyed sites. In addition, the field survey should determine whether unknown sites are located in the project area.

6. Recorded archaeological sites along the east side of Highway 79 across from the Paso Picacho Campgrounds that may be impacted by the proposed staging area include SDI-9075 and SDI-900; many others are within one-half mile of the project. Numerous surveys have been conducted previously, many in the 1970's, 1980's and 1990's; some more recently following the Cedar Fire of 2003. The previous work should be reviewed for adequacy and a field survey is recommended to relocate the previous sites and to identify undiscovered sites.

7. Project design should take into account avoidance of significant archaeological sites, both historic and prehistoric.

8. Testing of impacted sites is recommended to determine significance, boundaries and adequate mitigation.

9. The County recommends that Native American monitors be present during both the survey of the proposed Merigan project area and testing of any impacted prehistoric site.

GEOLOGY AND SOILS

10. The project proposes to install an on-site sewage disposal system to Regional Water Quality Control Board (RWQCB) standards to treat wastewater at the proposed Merigan Ranch campground area. The County Department of Environmental Health (DEH) is responsible for permitting the installation of septic systems in throughout the County of San Diego, including incorporated cities with San Diego County. State Park land however, falls under the jurisdiction of the RWQCB. Recently, DEH reviewed proposed septic systems for a subdivision along Maggio Drive (approx. 1 mile east of the Merigan site).

Due to high groundwater and the inability of the septic system designs to meet groundwater separation requirements, the project was denied. Large meadow areas in Descanso can be suspect for seasonal high groundwater. In addition, the County has been monitoring groundwater levels from a well located on the Merigan site and in one year groundwater levels were found to be within two feet from the surface (Attachment A). The County recommends that the ability of the site's geology to support a septic system or sewage treatment plant at the Merigan Ranch be fully investigated at this time. It should not be assumed that a septic system or a package sewage treatment plant will be feasible at this location. If the site cannot safely support a sewage disposal system, alternative locations for the campground should be investigated.

HAZARDS AND HAZARDOUS MATERIALS (VECTORS)

11. The EIR should address the potential for vectors, such as flies, rats and mosquitoes to be supported onsite from proposed manure storage, storage of feed for horses, and any standing water sources such as water troughs for horses. Vectors can represent a significant health and safety impact, if potential vector breeding sources are not properly managed. Furthermore, the proximity of children and residential uses on neighboring unincorporated County land increases the importance of properly managing potential vector breeding sources to ensure nuisances and public health concerns are not generated. The County of San Diego considers potential impacts from vectors during discretionary project reviews and has developed draft guidance for addressing potential vector breeding sources associated with a proposed project. This draft guidance is available at http://www.sdcdplu.org/dplu/docs/BPR/Vectors-guide.pdf. The guidelines and report formats for preparing vector management plans included herein may be of assistance to address the potential vector impacts of the project. When these Guidelines are finalized, they will be available online at http://www.sdcdplu.org/dplu/Resource/3~procguid/3~procguid.html.

NOISE

12. The NOP indicates that there will be a substantial increase in noise levels as a result of the project and nearby sensitive receptors (i.e. the school) would experience this noise level increase. The NOP states, "construction near these sensitive receptors could be limited to after 7 am and before 7 pm." This measure does not reduce the potential noise impacts to sensitive receptors at the school because these are the hours that children will be in school. The EIR should include an analysis of the noise impacts of the project and should ensure that noise levels on unincorporated County lands do not exceed the standards outlined in the County of San Diego Noise Ordinance, available online at http://www.sdcounty.ca.gov/dplu/Resource/docs/3~pdf/NoiseOrdinance.pdf.

HYDROLOGY AND WATER QUALITY

13. The proposed campground and equestrian facilities at Merigan Ranch would require groundwater. This portion of the County is entirely groundwater dependent and there are a number of groundwater users in the unincorporated portion of the County directly adjacent and within the project site's watershed. Adjacent groundwater users include the adjacent elementary school and Well #5 of the Descanso Community Water District (DCWD). Well #5 is the only well being used by the DCWD to serve the Descanso community, and is located downgradient of the proposed Merigan campground site. From 2000 to 2004, the well provided from 90 to 110 acre-feet of water per year to over 300 metered users, consisting largely of residential homes.

    Based on the potential impacts to groundwater supply and groundwater quality that the project may have on existing and potential future groundwater users (to the maximum allowable density as allowed by the County's General Plan) in the unincorporated community of Descanso, the project should perform a detailed cumulative groundwater investigation. The investigation should be completed by a California Certified Hydrogeologist. The County can provide a list of qualified consultants that could conduct the investigation. The groundwater investigation should include the following to evaluate potentially significant impacts:

    a. <u>Potential Cumulative Impacts to Offsite County Groundwater Users.</u> Groundwater recharge should be evaluated based on at least the past 30 years of monthly precipitation for the watershed. The computer program RECHARG2 (utilizes the Thornthwaite Method, known as the soil moisture balance methodology) or similar and acceptable methodology should be used to calculate groundwater recharge. Estimates of groundwater storage capacity should be estimated for each hydrogeologic unit at the project site and within the project's watershed. Groundwater demand taking into account all existing and potential groundwater users at the maximum buildout of the County General Plan should be estimated. Using (1) estimated monthly groundwater recharge that has occurred in the watershed over the past 30 years, (2) the amount of estimated groundwater in storage, and (3) groundwater demand at maximum buildout of the basin; the long-term groundwater availability of the watershed must be evaluated. The evaluation should utilize the past 30 years of recharge to indicate whether groundwater in storage would be sufficient for a 30 year period of groundwater demand at the maximum buildout of the watershed. If groundwater in storage is reduced to a level of 50% or less by groundwater extraction through the 30 year period, the project would have significant impacts to groundwater supply and an alternative site should be selected.

b. Well Interference to Offsite Users. Offsite well interference should be analyzed to ensure the project does not create impacts to offsite County well users. A well test or tests should be performed to show the estimated amount of groundwater drawdown induced from offsite wells, including Well #5 of the DCWD. The County uses estimates of offsite drawdown as a screening tool to determine whether significant groundwater impacts could result from a project. The County recommends estimating offsite well drawdown over a five year period, and if results indicate a water level decrease of 20 feet or more in any offsite wells, the project could have significant groundwater impacts.

c. Groundwater Dependent Habitat. If there is any groundwater dependent habitat onsite or adjacent to the proposed wells to be used for the Merigan site, an analysis should be performed to evaluate the potential impacts from groundwater extraction on groundwater dependent habitat. If the project would drawdown the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels, the County would consider this to be a significant impact.

d. Water Quality Impacts. Groundwater beneath the project site has been monitored by the County since 1990 in a well called DES-07 located in the middle of the Merigan parcel (see Attachment A – Groundwater Levels at the Merigan Ranch Site). Water levels have been as shallow as 2 feet below the ground surface. With groundwater conditions being this shallow, manure and potential septic systems onsite would have a direct conduit for elevated levels of nitrate and bacteria (including fecal coliform) to enter into the groundwater and may impact offsite and adjacent groundwater users. The community drinking water well, Well #5 located directly adjacent and downgradient of the project parcel, is of particular concern. Based upon the onsite groundwater conditions recorded, there could be a significant impact to the water quality of offsite groundwater users as a result of the project.

TRAFFIC AND TRANSPORTATION

14. The EIR should provide a "with" and "without" project traffic analysis for the near term/opening day and long-range scenarios.

15. The EIR should assess the projects' potential impacts to the following County and Caltrans roadway segments and intersections:

- SR-79
- Sunrise Highway / S-1
- Viejas Boulevard (SA 360)

- Riverside Drive @ Viejas Boulevard
- SR-79 @ Sunrise Highway
- Viejas Boulevard @ Project Driveway (Merigan Site)
- Viejas Boulevard @ SR-79
- SR-79 @ Old Highway 80
- SR-79 @ Project Driveway (Paso Picacho Site)

16. The EIR should reference the County's Guidelines for Determining Significance and Report Format Requirements for Traffic and Transportation. The traffic analysis should follow the format requirements for facilities within the unincorporated area as specified in the County's approved guidelines. The Guidelines area available at the DPLU website, http://www.sdcounty.ca.gov/dplu/Resource/3~procguid/3~procguid.html#trans.

17. The EIR/project's trip generation assumptions should consider all activities/events associated with the uses identified in the project description (Pg.2) such as campsites, the arena, and horse corrals.

18. The EIR should identify the uses and associated trip generation assumptions for the two individual project sites.

19. The EIR should identify/assess the traffic impacts associated with special events that will attract visitors to the project sites.

20. The EIR should provide recommended mitigation measures for all of the project's potential traffic impacts associated with the campground and equestrian facilities and special events.

21. The project's trip generation assumptions should be based on/consider the peak period and peak season, such as weekends & holidays and summer, for use of the proposed campground and equestrian facilities.

22. The EIR should assess the project's potential impacts to an existing elementary school located along Viejas Boulevard. The EIR should specifically address the project's potential impacts to the school's parent pickup/drop off locations.

23. The EIR should discuss/assess emergency access for the project sites.

24. The EIR should assess the parking requirements for the project's proposed uses. The parking requirements should consider regular activities and special event activities.

25. The NOP indicates that large truck and trailer rigs will utilize the project sites/facilities. The EIR should assess the ability of the project's two-lane access roads to adequately accommodate traffic from large trucks and trailer

rigs. The EIR should discuss potential impacts from large vehicles towing trailers and queues that can form from their slower travel speed.

26. The EIR should identify/assess the project's access driveways onto the County and Caltrans roadway systems. The EIR should verify that adequate corner sight distance will be provided at the project's access driveways/intersections.

27. The EIR should contain conceptual striping/signing plans for the proposed project entrances. Also, any additional right of way dedications needed to accommodate acceleration and turn lanes to accommodate these vehicles should be in the conceptual striping plans.

28. The EIR should include a brief summary of the County's General Plan 2020 (GP 2020) Circulation Element (CE) Road Network recommendations for affected roadways within the unincorporated area and evaluate consistency with the road network plans.

29. The project will need to acquire Construction Permits prior to any construction within County Road Rights-of-Way. Caltrans requires Encroachment Permits for work within State Road Rights of Way.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project, the DEIR for review, or providing additional assistance at your request. If you have any questions regarding these comments, please contact Jennifer Campos (858) 495-5204.

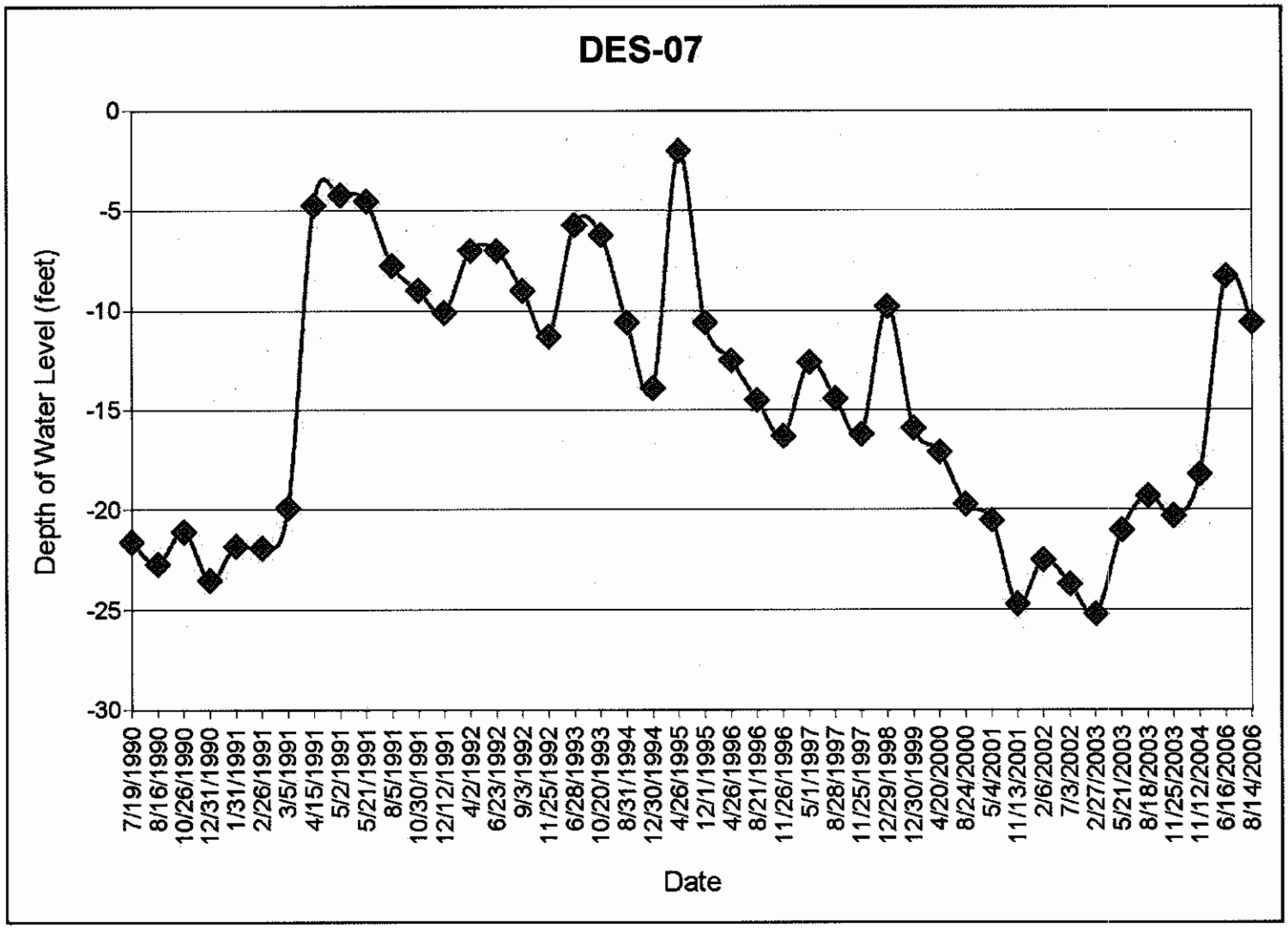
Sincerely,

ERIC GIBSON, Interim Director
Department of Planning and Land Use

Attachment A – Groundwater Levels at the Merigan Site

cc: Jeff Collins, Policy Advisor, Board of Supervisors, District 2, MS A500
Vince Nicoletti, CAO Staff Officer, DCAO, M.S. A-6
Kenneth Brazell, Project Manager, DPW, MS O336
Descanso Community Planning Group
Priscilla Jaszkowiak, Administrative Secretary, DPLU, MS 0650
Jennifer Campos, Land Use/Environmental Planner, DPLU, MS 0650

Attachment A - Groundwater Levels at the Merigan Site



Department of Toxic Substances Control

Linda S. Adams
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June 15, 2007

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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE CUYAMACA RANCHO STATE PARK EQUESTRIAN FACILITIES PROJECT (SCH# 2007051074).

Dear Ms. Miner:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of an Environmental Impact Report (EIR) and Initial Study Checklist for the above-mentioned project. The following project description is stated in your document: "The proposed project would create new equestrian facilities near the community of Descanso in the southern portion of the park including a campground, day-use amenities, and staging area within Cuyamaca Rancho State Park. The proposed campground project will include approximately 20 individual campsites, comfort station, horse corrals, round pens, arena, shade armadas, picnic areas, hitching rails, landscape and shade tree plantings, day-use equestrian staging, and associated amenities, utilities, and infrastructure. The proposed project would also create a day-use staging area near Paso Picaho, including space for approximately 8 truck and trailer rigs with pull-through parking and amenities. Some trees may need to be removed or thinned. New trails and/or trail connections to existing trails, including the California Riding and Hiking Trail, will be developed as part of the project. Depending on site conditions, restrooms would be on septic and/or a contained vault system, and access to water and power may need to be developed as part of the project. " DTSC provides comments as follows:

1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.

2) The EIR should identify the known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information.

4) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

5) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.

6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.

7) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to

determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.

12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

14) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

15) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.

16) Your document states: "The proposed project involves two separate sites. Merigan Ranch Area – Equestrian Campground,... a former agricultural site located adjacent to the unincorporated community of Descanso. Paso Pacacho vicinity - Equestrian Staging, located on the east side of Hwy 79." If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

17) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

If you have any questions regarding this letter, please contact Ms.Teresa Hom, Project Manager, at (714) 484-5477 or email at thom@dtsc.ca.gov.

Sincerely,

Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814

CEQA#1665

Comments and Concerns on the CRSP Equestrian Facility
Jo Ellen Hucker [joellen@aabol.com]
To: Environmental Review
Cc:
July 8, 2007

Karen Miner, Project Manager
Southern Service Center, California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

To Whom It May Concern:
On June 21, 2007, the Descanso Planning Group (DPG) reviewed the Notice of Preparation (NOP) and the attached CEQA document for Project Title: Equestrian Facilities Project, Cuyamaca State Park.
Understanding two NOP's were issued for two different project sites; the DPG would like to be clear that the responses contained in this statement are limited to the NOP for the entirely new project in the Merigan Ranch Area which will establish new equestrian facilities in the community of Descanso; immediately adjacent to the Descanso Elementary School, on Viejas Blvd. in the southern portion of Cuyamaca State Park.
The proposed project at this site in the Merigan Ranch Area would include approximately 20 individual campsites, including a host site, comfort station, horse corrals, round pens, arenas, shade armadas, picnic areas, hitching rails, landscape and shade tree plantings, day-use equestrian staging, and associated amenities, utilities, and infrastructure.
The DPG has the following comments and request they be addressed in the Environmental Impact Report:

Aesthetics
1. The project will have substantial adverse effects on a scenic vista. The project is visible from the school, library, businesses and several residences in the area. This project will permanently affect the viewshed; the open meadows and the views across it. Viejas Blvd has been classified as a third priority scenic route in the Scenic Highway Element of the San Diego County General Plan.
2. Night skies will be adversely impacted by lighting from the project. This area is currently protected by the Night Skies Ordinance because of its close proximity to the Mount Laguna Observatory. Neighboring residences will be affected by this new source of lighting from this project.
3. This project will substantially degrade the existing visual character of the site and its surroundings.
4. The Descanso Elementary School is a historic building. The project will degrade the visual character and quality of the school
5. Proposed earthen berms to mitigate the visual effects will create additional visual impacts and create more dust and pollutants; especially during the many wind storms and dry high pressure systems that happen in this area of the County. Proposed mitigation through landscaping will be difficult. Trees won't grow in this area due to the fact this is seasonal wetland. This area is subject to flooding.

Air Quality

1. This project will result in substantial degradation to the air quality in the area through increased daily vehicle trips, dust from the campground, roads, trails, proposed arenas, and any unpaved area.
2. There will be a significant impact on the surrounding community from odors from the large number of horses, horse manure, manure bins, trash bins, restrooms, dump stations for RV waste disposal, etc.
3. Proposed mitigation for dust through the use of a water truck or sprinkler is highly improbable due to the rapid evaporation rate during the summer months. Drought, high air temperatures and the constant movement of horses and vehicles will create constant dust and airborne pollutants.
4. The children and staff of the neighboring school will be exposed to airborne pollutants through the daily grinding of manure into the soil by the horses which will then be carried by dust and winds into the school grounds. Children are reported to be sensitive receptors to these pollutant concentrations
5. Insects will be attracted to the area by the odors permeating the air of the surrounding area. This will increase the insect population school grounds and the surrounding community. There will be the potential for a much larger number of horses than already exist in the area. This will carry significant impact, from daily exposure to the increased numbers of flies, bees, mosquitoes, etc., to the residences and the children and staff at the neighboring school.

Biological Resources

1. This area has increased significance after the 2003 Cedar Fires. It is one of small number of areas that did not burn in Cuyamaca State Park after the fires swept through this area. This area acts as a regenerative area for the surrounding areas that were burned.
2. This is a meadow, seasonal wetland and wildlife corridor. This project will carry significant impact to wildlife and their habitat.
3. There is a seasonal stream that runs through this meadow. There is a culvert to accommodate the stream located next to the school that runs underground Viejas Blvd. and then drains into the Sweetwater River. The runoff from the horses and other use in the area will be draining into the Sweetwater River. Mitigation for runoff carrying pollutants into the Sweetwater River from this project needs to be addressed in the EIR.
4. The use of a meadow for the development of this project is inconsistent with the Cuyamaca State Park General Plan, despite argument this a “tainted site” due to prior agricultural use.

Cultural Resources

1. There is archaeological site just north of the meadow. The site contains mortar rocks, dozens of shards of ancient Tizone brownware, and other important findings. This project will cause degrading of soil and increased use of the area. How will this site be

protected from grading, usage, etc? Who will determine the significance of the site? Has this site been reported to the Bureau of Indian Affairs or any other agency or resource specialist who will provide oversight, specialized advice or guidance in mitigation, avoidance or use denial?

Geology and Soils

1. The meadow this project is to be developed on is a seasonal wetland. This north side of this meadow leading back into the Cuyamaca State Park is on a steep grade. Rainfall flows into this bottom land meadow.
2. In dry years, high levels of visitor and equine use will increase the loss of topsoil.
3. In wet years, high levels of visitor and equine use will cause significant runoff in already degraded topsoil to occur.
4. The entire project is to be located in the meadow. Liquefaction of soil will occur during wet years and horses, people and vehicles will sink into the marshy, boggy soils. No mitigation through construction will alleviate this problem.
5. Groundwater is at surface level during the wet season in this meadow. Consequently, this will affect percolation of septic systems in this area.
6. Removal of the horse manure in wet, marshy soil becomes improbable, if not impossible.

Hazards and Hazardous Material

1. This project will cause the release of waste and airborne pathogens into the environment through manure being mixed into the soil and released through the dust created by the wind, traffic, horses and people using the facility.
2. This project is located less than ¼ mile from an existing school. Transportation and Handling of human and animal waste and waste byproducts from this project will occur within this area.
3. This project has the potential to create an obstruction during an emergency evacuation. During an emergency evacuation, traffic may increase due to high visitation at the campground and equestrian staging areas. There is ingress and egress from only one driveway at the site. The site to the east, west and south is surrounded by State, County and private property. The north is access further into the State Park by way of the unpaved Merigan Fire Road.

Sole egress and ingress into the facility is from Viejas Blvd. which is a 2 lane road. This road is the sole evacuation route for a large part of Descanso. Viejas Blvd is flanked by 2 bridges. If either bridge were closed due to fire, it would leave all traffic to funnel through one escape route onto Highway 79.

School buses evacuating the children from the school, emergency response vehicles, and trailers carrying livestock, (both from the campground and the residents), residents and visitors must all use Viejas Blvd. as an evacuation route.

Park rangers assisting in evacuation will not mitigate the problem of increased traffic and gridlock on this road during high risk of wildfire.

Hydrology and Water Quality

1. Percolation may be an issue at this site due to water levels rising to surface level during wet years.

2. This project would be located approximately ¼ mile from the Descanso Community Water District (DCWD). Currently the DCWD has one well available for usage. The other wells available to the DCWD are not able to be permitted by the State. The DCWD serves 312 homes in Descanso. The school and several private property owners also have wells in close proximity to the project. All are concerned with degradation of water quality through nitrate leaching into the groundwater.
3. It is unknown whether the project would substantially interfere with groundwater recharge, or whether a net deficit in aquifer volume would occur due to construction. There will be increased use of water consumption by horses, people, proposed landscaping and proposed sprinkler systems. It is also unknown if the water level would drop to a level that would not support pre-existing nearby wells.
A comprehensive groundwater study must be completed as part of the EIR.
4. There is a seasonal stream located on this site. Existing culverts currently aid in drainage from this area. Drainage patterns may be altered due to construction and grading. This could cause flooding.

Land Use and Planning
1. This project is not in keeping with the rural character of the community.
In the Central Mountain Community Plan, the goals are
-Preserve the small-town, rural character of the communities in the subregion and the natural ambience of mountains, hills, valleys and public lands.
-Encourage the protection existing vegetation, wildlife and other natural resources.
-Discourage high density public and private development.
This project due to its size and scope are not only incompatible; but are also in violation of the community plan.
Increased activity, traffic, insects, noise, lighting, and a transient population will all have adverse impacts on the school, library, and private property owners and their property values.
2. It should be noted that the Superintendent, Patrick Judd of the Mountain Empire School District has not been notified of the project; and that copies of the NOP were delivered to the Superintendent and the Mountain Empire School Board by the DPG

Noise
1. There will increased noise along the site's access roads.
2. Permanent increased noise levels will occur in the vicinity of the project.
3. There will be impacts to the school through permanently increased noise levels that can affect school activities, teaching and learning.

Public Services
1. This project carries the potential for significant impact to the school and fire protection services.
If, after implementation of the project, the adverse impacts require closure of the existing school, the cost would be prohibitive for the construction of a new school.
Response times from fire protection could be dramatically reduced due to increased traffic to and from the project; especially during special events and weekends at the facility.

Recreation

1. Due to the closure of Los Caballos, the equestrian campground on the north end of the park, there would be increased visitation at the proposed facility. Proximity to Highway 79 and the town of Descanso would also result in increased visitation. This may require expansion of the project that would further exacerbate the negative impacts of this project
2. This could increase visitation to the adjacent County community park located on the school grounds leading to the further deterioration of the school grounds. They are badly in need of repair and there is no available funding for the County Park. PLDO funds are no longer available to Descanso due to a liability issue in the Joint Powers of Agreement between the school district and the Department of Parks of Recreation for the County of San Diego.

Transportation/Traffic

1. Residences are mixed with wildlands in this area.
There is only one entrance and exit from this project.
This project carries the risk of exposing people and structures to wildfire. Significant risk of loss, injury and death could result in delayed response times from emergency vehicles due to traffic congestion.
This congestion will be created, in part, by the large slow moving vehicles towing horse trailers and RV's that will be frequenting this facility.
Regular visitation for day use to the facility will also increase traffic congestion. The Descanso Falls is located just north of the facility and has been a long time attraction for visitors to the area.
2. There is no proposed mitigation for the impacts of the increased traffic in this area. This project is miles removed from Interstate 8. It is stated in the CEQA document that a mitigating factor for the campground is that it is not far from Interstate 8. This is not a mitigating factor and is an absurd statement.
3. Neither will an improved driveway provide mitigation. There is still only a 2 lane road onto which vehicles can ingress and egress.

Mandatory Findings of Significance

1. This project has the potential to degrade the quality of the environment, threaten plant and wildlife habitat and corridor, destroy an archaeological site, and threatens the community of Descanso through exposure to increased danger from wildfire.
2. This project also has the potential to cause harm to the Descanso Elementary school children and its staff through exposure to increased insects, a transient population, respiratory problems from manure and dust, noise and increased traffic congestion.

We appreciate your time and attention to this matter. We look forward to your response to our concerns and comments.
This statement was prepared and submitted by Jo Ellen Quinting, Chair for the Descanso Planning Group. If you have questions or comments, please feel free to call Jo Ellen Quinting at 619-445-7462 or email to joellen@aabol.com.

Respectfully,
The Descanso Planning Group
PO Box 38
Descanso, CA 91916

CC: Supervisor Dianne Jacob
MEUSD School Board Member Trina Ambrose
Dave Nissen, San Diego Rural Fire
Duncan Mc Fetridge, President, Save Our Forest and Ranchlands
Rick Heller, M.A. Anthropology
DPLU/San Diego County Planner and Coordinator, Jennifer Campos

Mountain Empire Unified School District
Office of the Superintendent
3291 Buckman Springs Road, Pine Valley, CA 91962
(619) 473-9022 Office (619) 473-9728 FAX

July 3, 2007

Karen Miner, Project Manager
Southern Service Center, California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

Dear Ms. Miner

I am the Superintendent of the Mountain Empire Unified School District with a school adjacent to a proposed project in the Cuyamaca Rancho State Park. I believe that the site of concern is the Merigan Ranch Area –Equestrian Campground, Day-use Facility and Trailhead Staging. I am unaware of all of the details for this project because my office was not a recipient of the notification process your agency used. We have an elementary school immediately adjacent to the proposed project and have many questions and concerns regarding the health and safety of our students and their families.

Some of the possible effects identified in the portion of your notice that I have reviewed cause great concern for the potential negative impacts on the Descanso Elementary School community. These concerns include impacts on visual resources, air quality, noise, soils, hydrology, water quality, appropriateness of the land use and traffic. While some of these issues may be mitigated as the plan is developed, the Board of Education would like to receive the details of the project so we can review the elements of the proposed project and determine if we have any issues or objections. I would hope your agency would extend us the opportunity to extend the deadline for review and comment so that the Board of Education can be diligent in their duties to protect the interest of our students and community. Please provide me with a reply as soon as possible so I can plan for the dissemination of the materials you send to the Board of Education. Our next School Board meeting, where this information can be reviewed, is August 15, 2007.

Thank you in advance for your assistance in this matter.

Patrick Judd
Superintendent

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, Governor

GOVERNOR'S OFFICE OF EMERGENCY SERVICES
DISASTER ASSISTANCE PROGRAMS BRANCH
3650 SCHRIEVER AVENUE
MATHER, CALIFORNIA 95655
PHONE: (916) 845-8101 FAX: (916) 845-8381

OES CALIFORNIA
Governor's Office of Emergency Services

May 15, 2007

Karen Miner, Project Manager
Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego, Suite 270
San Diego, CA 92108

RE: Notice of Preparation for the Cuyamaca Rancho State Park Equestrian Facilities Project

Dear Ms. Miner:

We received a Notice of Preparation for the above project and would like to be added to the project's mailing list for future project notices and circulation of the environmental document. The Governor's Office of Emergency Services coordinates with the Federal Emergency Management Agency in its administration of the Public Assistance Grant Program, which is partially funding your project.

We wish you good luck with the project and look forward to receiving the draft EIR. If you have any questions please contact Andrew Rush at (916) 845-8269.

Regards,

Dennis Castrillo

Dennis Castrillo
Environmental Officer

State of California—Business, Transportation and Housing Agency ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
4902 Pacific Highway
San Diego, CA 92110
(619) 220-5492
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

June 8, 2007

File No.: 645.07.12678.A6732

Ms. Karen Miner
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Dear Ms. Miner:

Re: Project SCH# 2007051074, Notice of Preparation (NOP) EIR, Cuyamaca Rancho State Park Equestrian Facilities project

The San Diego Area Office of California Highway Patrol received a Notice of Preparation (NOP) Environmental Impact Report for the above entitled project (EIR). Because of our geographical proximity to the site, we have been asked by our Special Projects Section to assess traffic related matters that may affect our area operations.

According to your NOP, the project "will increase the types of large vehicles towing horse trailers in the immediate area of the campground and southern day-use area. These vehicles are slow moving and can cause increased traffic queues, especially on weekends and holidays or during special events." Except for that aspect, it appears that the project will have less than significant impact on transportation and traffic.

It appears that the project is outside of the San Diego CHP Area and more properly within that of El Cajon. We believe that area would concur in our remarks but you should direct future correspondence to this project to its office 1722 East Main St., El Cajon 92021-5259.

We appreciate the opportunity to comment your plan. If you have any questions regarding this letter and our comments, please contact Lt. Sean Barrett at (619) 220-5492.

Sincerely,

C. M. McGAGIN, Captain
Commander
San Diego Area

cc: Special Projects Section
cc: El Cajon Area

Safety, Service, and Security

San Diego County Archaeological Society, Inc.

Environmental Review Committee

19 May 2007

To: Ms. Karen Miner, Project Manager
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, California 92108

Subject: Notice of Preparation of a Draft Environmental Impact Report
Equestrian Facilities Project

Dear Ms. Miner:

Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

Cuyamaca Rancho State Park, Equestrian facilities Project Draft EIR
Larry Pierson [Pierarchaeo@bfsa-ca.com]
To: Environmental Review
Cc:

We would appreciate being on the distribution list for commenting on the draft EIR for this project.

Larry J. Pierson, RPA
Senior Archaeologist and Historian
Brian F. Smith and Associates
14010 Poway Road, Suite A
Poway, California 92064
Phone (858) 484-0915
Fax (858) 679-9896
Riverside (951) 681-9950
Website www.bfsa-ca.com

Environmental Review

From: HamlinePl@aol.com [HamlinePl@aol.com] **Sent:** Fri 5/18/2007 1:23 PM
To: Environmental Review
Cc:
Subject: Attention: Karen Miner
Attachments:

Attention: Karen Miner

Equestrian Facilities Project
Cuyamaca Rancho State Park

Subject: Project Location

You need an overnight Horse Camping facility in the north end of the park. You have many former users of the park coming from Riverside and San Bernardino Counties. If there was a way to check the records you would find probably most of the campers came from these areas. It will just be a camp on the Merigan Ranch area for San Diego County users.

People from the north enjoyed stopping in the little town of Julian on the way.

People north of the park have to travel through enough curved roads to reach the park from the north end. Most I have talked to will not drive the extra miles to the south end of the park. The group camp and the single camping area were great facilities. We have used both many times. I know it will curtail the people from our Equestrian Center from using the park.

Sincerely,
Frank Miller, Canyon Lake Equestrian Facility
22358 Boating way
Canyon Lake, CA 92587

See what's free at AOL.com.

May 16, 2007

Dear Ms. Miner:

I would like to thank you for your work concerning the horse camp at Cuyamaca. I live about 2 ½ hours away. I have camped on numerous occasions and always loved being up there even after the fire. I know it will take many years for the trees to grow back, however Los Caballos may be an even a greater loss. One of my favorite things to do which I could do from either campground was to ride just before dusk on a loop that went next to the beautiful lake. We enjoyed watching the wild life at that time of day, seeing the lake which you don't get to do if the new campground is at the other end of the park. I also liked to ride to which ever campground I wasn't staying at because it was a short ride and it was fun to see the other horse campers. The close proximity of the camps made this possible. It would seem to be better in terms of taking care of the camps to have them close together. I guess I have to give up on ever getting Los Caballos back all because of a fire and politics. What a shame to have something so used be taken away from us in order to let the land lay useless because a few Indian items were found. It used to be when nations were conquered the world went on with their life and you didn't try to give everything back to the past. Now battles are fought with lawyers and politics which is better than killing but if I had my way we would just have taken the camp back. We have lots and lots of Indian relics and we have a lot more horsemen enjoying horse camping than Indians looking for relics. The Indians should be happy and take care of their people with all the money rolling in from gamblers at their casinos. There revenge is taking money in from all the retired, bored older Americans they bus to their casinos. Sorry for going on about the unrelated things I feel.

Respectfully,

Beverly Miller

P.S. Really have nothing against Indians & own a lot of their jewelry.

Ride On

Therapeutic Horsemanship

401 Ronel Court, Newbury Park, CA 91320 Tel No (805) 375 9078 Fax No (805) 375 8640

May 15 2007

Karen Miner,

I just want to comment on the Cuyamaca Rancho State Park Equestrian Facilities Project.

I have ridden and camped at Cuyamaca for more than 20 years - myself and riders with disabilities.

I implore you to find a camping area nearer the heart of the park. To put campsites so far away that we will have to trailer to reach our favorite trails is unfair. Horses are part of the Park. Please look for another plan. Sincerely,

Gerald Hamilton
Program Director

A 501 (c)(3) non-profit corporation. Tax ID: 95-4465783
Accredited and Insured through North American Riding for the Handicapped Association
Serving Conejo and San Fernando Valleys

COURTNEY ANN COYLE
ATTORNEY AT LAW

HELD-PALMER HOUSE
1609 SOLEDAD AVENUE
LA JOLLA, CA USA 92037-3817

TELEPHONE: 858-454-8687 E-MAIL: COURTCOYLE@AOL.COM FACSIMILE: 858-454-8493

Karen Miner, Project Manager
California State Parks
8885 Rio San Diego # 270
San Diego, CA 92108

Via Fax: 619.220.5400 and Mail
July 11, 2007

Re: Comments on NOP for Equestrian Facilities Project
Cuyamaca Rancho State Park (May 14, 2007)

Dear Ms. Miner:

This NOP comment letter for the above-captioned project is sent on behalf of Carmen Lucas, Kwaaymii Band of Laguna Indians. The notice for the NOP invited comment on the scope and content of the information to be included and analyzed in the CEQA process.

As you know, tribal entities have already provided extensive information to State Park's staff and management through consultative meetings, site visits, attendance at equestrian hosted meetings, attendance at an earlier NOP scoping meeting held June 15, 2006 and at the June 12, 2007 scoping meeting, and through prior correspondence including the undersigned's letters of October 31, 2005, May 3, 2006 and June 30, 2006. This comment letter supplements those prior communications. As you know, actively participating tribal entities have included representatives from Jamul, Manzanita, Mesa Grande, Sycuan, Viejas, and Santa Ysabel in addition to the Kwaaymii.

This letter offers comments on the NOP and raises project specific and general concerns to be addressed in the DEIR. Please know that it is our intent to continue to try to work cooperatively with DPR and other interested parties to arrive at a project, or suite of projects, that can both satisfy recreational needs while offering appropriate management for the irreplaceable historic and tribal cultural resources that are under the Park's care and management.

Status of Earlier NOP

The current NOP correctly notes that two previous NOPS were issued for Cuyamaca Rancho State Park: one, the "Los Caballos Equestrian Campground Project" (Fall 2005) and the other, the "Equestrian Family Campground Replacement" (Spring 2006) which specifically superseded the former NOP. The new NOP states it is for an "entirely new project" to establish: 1) new equestrian facilities near Descanso including a

campground, day-use amenities and staging area and 2) a permanent day-use equestrian staging area near Paso Picacho and to establish connecting trails to these facilities where needed

Please indicate whether the current NOP revokes or supersedes the prior NOP: Regardless of whether this is a new or replacement project, it would be our preference that the prior NOP be formally revoked or superseded as it has significant shortcomings from a tribal viewpoint and caused unnecessary controversy. Please confirm the status of these prior NOPs.

Also, please clarify the following ambiguities in the current NOP: 1) whether the project component to establish connecting trails applies to both the Merigan and Paso Picacho facilities and 2) what "amenities" are proposed for the Paso Picacho project – the NOP is unclear in both regards.

On-Site Alternatives/Project Design

If an EIR is prepared, it probably will have an Alternatives analysis that includes review of on-site design alternatives.

Regarding Merigan: because of its location, DPR should consider acquiring additional lands on either side of the Merigan property that are currently designated as rural residential to help minimize the potential for future land use conflicts.

Regarding Paso Picacho: decomposed granite or other permeable materials should be used wherever possible instead of paving; the project also should be screened from public views from the scenic road.

Off-Site Alternatives/Project Location

If an off-site Alternative is studied as part of the DEIR, we respectfully request that it does NOT include any of the locations that tribal entities have previously deemed unacceptable for campground facilities through consultation with DPR prior to the release of this NOP, for example, Los Vaqueros and Stonewall.

As you know, tribal entities have previously identified Tulloch Ranch, Cuyamaca Lodge, Lucky 5 North and Green Valley Meadow as potentially acceptable locations for an equestrian campground, subject, of course, to environmental review and further consultation.[1] The tribes, in good faith, have identified several potential locations for horsecamp use. When the tribal entities visited each potential location they asked how will this work for horses and the equestrians, not just would this location pose an unacceptable impact to heritage resources.

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[1] Arrowmakers Ridge was also identified as potentially acceptable, but it is still an area of concern for the tribal entities, and therefore ranked lower than the aforementioned locations.

On the other hand, certain sites are NOT acceptable to tribes for this project (or as part of any General Plan update or revision) because of significant, unmitigated impacts to cultural, historic and tribal resources. Cuyamaca has one of the best groupings of historic sites remaining in the county: To locate campground facilities in these locations would directly violate the Cuyamaca General Plan which states that, "The department shall locate/relocate roads, trails, campsites, and other facilities away from Native American sites, and shall install buffers around the sites where necessary." (Plan, Page 26). Moreover, locating a campground at either of these two locations, within the identified corridor of cultural concern, would present an unacceptable spiritual violation for the tribes, as previously explained face-to-face to DPR.

The proposed Los Vaqueros location was already physically staked by Parks before the tribes went on their site visit with DPR staff; notably, it was the only staked location of the twenty-some locations we visited. The tribes immediately expressed their concern that it appeared that Parks had predetermined the new campground location prior to conducting tribal consultations. As for the Stonewall location, just because a place may have been "disturbed" by a previous use, does not mean the area no longer has historic or tribal cultural values.

Finally, we agree with the analysis and conclusion in the DPR "Frequently Asked Questions" handout from the June 15, 2006 NOP public meeting, that rebuilding in or around the former Los Caballos campground is infeasible and not legally defensible.[2] If for some reason this site is studied as an alterative, the DEIR should also reference that the Ah-ha'-Kwe-ah'-mac village site has been determined eligible for listing on the National Register of Historic Places by the State Historic Resources Commission (May, 2007).

Issues to be Addressed in DEIR

Location Specific Issues:

Regarding Merigan: Dr. Susan Hector should be retained to draft a good enthno/prehistory report of the Descanso area and how it ties in to the Cuyamaca region; and project design should support, not inhibit, any wildlife corridors that might occur in this area.

Regarding Paso Picacho: impacts to streams and cultural resources along the Cold Stream Trail must be avoided and actively managed, possibly including some redesign of the trail away from cultural resources.

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[2] This location is of particular concern given recent newspaper articles which have stated that a replacement is still being sought for the Los Caballos equestrian camp and have quoted an equestrian that she hopes Los Caballos might reopen. San Diego Union Tribune *"Park officials propose horse camp at Merigan,"* May 18, 2007. Also, we also strongly disagree with the assertion made by the equestrian in that article that relayed that the Cuyamaca Equestrian Association has hired an archaeologist who believes that the historic site can be preserved while being used as a camp.

Regarding trail connections: all trails should be looked at and evaluated to move them away from cultural resource locations. This is consistent with the Cuyamaca General Plan language quoted above.

General Issues for Each Location:

All project locations and aspects must have an archaeological survey with qualified Native American participation; a qualified Native American monitor must be present during all ground disturbing activities, a good, consistent and funded active monitoring program must be implemented for archaeological and water resources;[3] and all toilet facilities should be located away from, and downhill of tribal cultural resource locations.

Any consideration of interpretative sites, themes or materials, at any of the project sites, can only be done after consultation with tribal entities regarding the appropriateness and form of such activities. The concern is that the public already may know about cultural resource locations, but tribal entities may not want to draw any more attention to them. Tribal cultural resources must not be exploited.

Each aspect of the project must avoid sensitive biological and cultural resources and propose effective barriers to protect these resources. Noninvasive, native plants should be used whenever possible.

Natural landforms including trees, boulders, and drainages should be avoided wherever possible.

The NOP states that some trees may need to be removed or thinned. Does this apply to both the Merigan and Paso Picacho projects? Please avoid impacts wherever possible to important trees such as oaks. If such trees must be disrupted, an opportunity should be made for tribal entities to salvage the wood. Also, if it is envisioned that trees will need to be planted, it may be advisable to get those started in the DPR plant nursery now. DPR should also take advantage of trees that may become available as development occurs elsewhere in the backcountry and make every effort to pot, replant or otherwise "bank" such salvaged trees, especially the old, grandfather trees.[4]

DPR must analyze the project and each alternative for its potential impact to tribal traditional cultural properties (TCPs) Key to this understanding will be the direction found in the U.S. Department of Interior, National Park Service, National Register

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[3] The DPR Handout for the June 12, 2007 public meeting references the temporary trailhead parking at Hual-Cu-Cush, another location containing sensitive tribal cultural resources. (Handout, page 2). What monitoring for cultural resources has been performed since the re-opening of this area to the public and what are the results? Can these help inform a monitoring program for this project?

[4] Environmental Design <treemover.com>, for example, uses a 14 foot hydraulic spade and ten blades to dig seven feet deep to carve out root balls as wide as 14 feet.

Bulletin 38: Guidelines for Evaluation and Documenting Traditional Cultural Properties (USDOI 1994).

If groundwater will be used at any location, a complete study should be conducted on how the individual projects will be supported by, and potentially effect, the water table.

Programmatic Approach

As we have stated previously, we believe a programmatic approach still has promise. This would include, for example, providing equestrian facilities at Tulloch Ranch, Green Valley Meadow and Merigan Ranch and would open up access to the north, middle and south of the Park to equestrian use, provide horse facilities for use during different seasons, create more trails and provide space and connectivity to allow for a more broad range of equestrian use. It would provide important land use advantages of not having to gerrymander cultural (for pioneer or prehistoric resources) or natural preserve boundaries and, importantly, would be outside of the primary corridors of cultural concern to tribal entities.

This programmatic approach would also have the advantage of looking out 20 years or more into the future, and provide enhanced equestrian facilities from those existing in the Park prior to the Cedar Fire, while respecting tribal cultural values and historic resources. Furthermore, these locations, and other trail facilities, could be optimized by DPR drafting and adopting a Trails Management Plan. DPR commitments to a programmatic approach could be made through conditions of project approval and adoption of a Mitigation and Monitoring Program.

What is the status of such an approach?

Conclusion

We hope that these comments will be of use to you and that Parks will continue to consult with the interested parties to work toward a solution for which we can all be proud. Please include my office on the list to receive copies of the DEIR and any technical reports or appendices relating to it.

Very truly yours,

Courtney Ann Coyle
Attorney at Law

Cc's on following page

NOP comment letter
July 2007

Cc: Hon. Paul Cuero, Campo
Hon. Ken Meza, Jamul
Nick Elliott, Manzanita
Hon. Mark Romero, Mesa Grande
George Prietto, Sycuan
Lisa Hawes, Viejas
Bernice Paipa, La Posta
Devon Lomeyesva, Esq., Santa Ysabel
Steve Banegas, KCRC
Larry Myers, NAHC
Client file

July 10, 2007

Karen Miner, Project Manager
Southern Service Center, California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

To Whom It May Concern:

The attached document was submitted to me, Jo Ellen Hucker.
I am forwarding this document onto Karen Miner, Project Manager for the Project Titled: Equestrian Facilities. I am requesting these comments be included under the Notice of Preparation and be addressed in the EIR. These comments are in regard to the proposed project that would create new equestrian facilities in the community of Descanso at the Merigan Ranch area site.

Thank you,

Jo Ellen Hucker
9885 Deer Valley Trail
Descanso, CA 91916
619-445-7462

SAVE OUR FOREST AND RANCHLANDS

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Gene Heisel, Secretary
Donna Regan, Treasurer

June 18, 2007

Jo Ellen Hucker
Chair Descanso Planning Group
PO BOX 38
Descanso, CA 91916

Dear Jo Ellen Hucker,

Sofar is writing to share some initial thoughts on the Proposed Equestrian Facilities Project, in Cuyamaca State Park, in the Northern part of the Descanso Valley. Extensive planning and scientific research has been done on similar habitat less than one mile away from the project site, and therefore, from a wildlife corridor perspective, much of the research done on the RV Park can be applied to the proposed equestrian camp, which is located on similar meadowland habitat

During research on the RV Park site it came to the attention of renowned conservation biologists such as Ted Case and Michael Soule that the Descanso Valley sits astride one of the most important wildlife corridors in the Cleveland National Forest. It follows that most of the concerns raised about the meadowland of the Oaks at Descanso proposed RV Park Project must apply to the meadowland where the Equestrian Facility is proposed. All of this information is made even more significant due to the catastrophic cedar fire and the biological importance of unburned habitat.

Sincerely,

Duncan McFetridge

Duncan McFetridge

Attachments:

Rachel B. Hooper; Shute, Mihaly & Weinberger; Comment Letter
Michael E. Soule; UCSC; Comment Letter
Ted J. Case; UCSD, Comment Letter
Richard W. Halsey; Southern California Chaparral Field Institute; Comment Letter
Alan L. Sawyer; Descanso Community Water District, Comment Letter
Barry Martin; San Diego Tracking Team; Comment Letter
Gregory K. Pregill, San Diego Natural History Museum; Comment Letter
Douglas T. Bolger; UCSD, Comment Letter
Sheri Minix; Descanso Planning Committee; Groundwater Comment
Todd Brown; Descanso Community Water District; Water Comment

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DAVID NAWI
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OF COUNSEL

**NOT A MEMBER OF THE BAR

May 11, 2005

Planning Commission
County of San Diego
5201 Ruffin Rd., Suite B
San Diego, CA 92123

Re: Project No. P90-028TE

Via facsimile

Dear Commissioners:

This firm represents Save Our Forest and Ranchlands ("SOFAR") on matters relating to the proposed Oaks at Descanso Recreational Vehicle Park ("Project"). SOFAR is an environmental organization dedicated to the preservation of San Diego's rural back country. The purpose of this letter is to urge you to withhold any decision on the permitholder's request to extend the use and reliance period of the Major Use Permit for the Project. Because the two years since the permit was issued have brought major change to the Project's environment via the Cedar Fire of November 2003, the California Environmental Quality Act ("CEQA"), Pub. Resources Code § 21000 *et seq.*, requires environmental review well beyond the Final EIR ("EIR") certified in April of that year.

Under California law, the Planning Commission may not extend the Major Use Permit unless and until it certifies a further EIR for the Project. Specifically, CEQA requires an agency to prepare a subsequent or supplemental EIR in connection with discretionary action on a project when "substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions of the environmental impact report," or new information shows that the project will have significant environmental effects not discussed in the initial EIR. Pub. Resources Code § 21166; Cal. Code Regs., tit. 14, § 15162(a), (c); *Mira Monte Homeowners Ass'n v. County of Ventura* (1985) 165 Cal. App 3d 357, 363-66; *see also Eller Media Co. v. Cmty Redevelopment Agency* (2003) 108 Cal.App.4th 25, 39-40. The decision whether or not to renew the expired permit is a discretionary action that triggers additional review: Under Section 7376(a) of the San Diego County Zoning Ordinance, the Planning Commission "may" extend an expired use permit.

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MICHAEL E. SOULÉ
CHAIR, ENVIRONMENTAL STUDIES

SANTA CRUZ, CALIFORNIA 95064

Sun, Jan 13, 1991

Duncan McFetridge, Chairman
Save Our Forests & Ranch Land
P.O. box 475
Deacanso, CA 92016

Dear Duncan,

It is good to renew our contact after 30 years or more.

As it turns out, I am quite familiar with the Roberts Ranch site, having spent some of my youth in the Descanso area, and having driven this stretch of I-8 and Japatul Road many times. As a native San Diegan and a refugee from San Diego's urban sprawl and pro-developer history, it is personally disappointing to witness the steady and rapid deterioration of the values our of backcountry, particularly, its recreational, wildlife and aesthetic values. Indeed it is a scandal and an embarrassment that a nation as wealthy as ours cannot afford to transfer such properties as the Roberts Ranch and the Las Bancas Ranch to the public domain.

The grasslands and meadows of the Cuyamaca Mountains and vicinity are a rapidly diminishing ecosystem in southern California. These habitats are relatively productive, compared to chaparral and forest, and become even more important as grazing pressure from livestock is removed. Originally, there were the grazing and hunting grounds of deer, antelope, cougar and grizzly bear.

A major gap in the biological survey data Draft EIR and accompanying appendices is any reference to the status of amphibians. Amphibians are now widely considered to the "canaries in the mine" as regards environmental impacts. Already, Red-legged frogs (*R. aurora*) and Yellow-legged frogs (*R. boylii*) are disappearing from the foothills and mountains of southern California, and are considered species of concern by many agencies. It seems likely that these and other species use the permanent and temporary ponds in this region.

The major impact of the denaturation and development of these lands are the *edge effects*

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07/10/2007 10:11 619-445-7485 ALPINE POST OFC PAGE 05

created by usurpation. One of the most important findings of conservation biology in the last decade is the deep penetration of disturbance that characterize the border between denatured and undenatured land. For example, dessication, fire effects, effects of domestic pets such as cats, effects of trampling, etc. always accompany a new development where it abuts wildlands. These effects often extent from hundreds of meters to several kilometers. Depending on the site, these edge effects can accelerate the disintegration of wildlands, and the slide towards habitat fragmentation and species extinction.

In the region under discussion, note that the Roberts Ranch—Las Bancas Ranch area is a deep wedge into the Cleveland National Forest along Interstate 8. Exacerbating this potential problem is the existence of Pine Valley. Assuming the development of housing on the above-named ranches, the area of disturbance and edge effects along Interstate 8 will extend effectively from Alpine to Pine Valley, compromising the movement of wildlife along this urbanizing corridor, increasing the mortality rates of many species[1] increasing the likelihood of fire, and isolating the Pine Creek Wilderness.

Are there ways to mitigate these effects? Not really. At the very least, developers should pay for the installation of wildlife linkages, insuring that animals like badgers and mountain lions can cross Interstate 8. I am not convinced that the mitigation of development on the aquatic and plant communities can really be accomplished. Existing evidence on this subject does not encourage optimism. The onus should be on the developer to demonstrate that the proposed restorations will actually work.

Sincere regards,

Michael E. Soulé
Professor and Chair

[1] Edges increase the mortality of song birds by predation from jays, pets, skunks, foxes, raccoons, and opossums, all of which are encouraged by human occupation. Edges and ranchette development also increase nest parasitism from cow birds. Not to be ignored are the impacts of children on natural habitats.

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DEPARTMENT OF BIOLOGY, 0116
TEL (619) 534-7108

9500 GILMAN DRIVE
LA JOLLA, CALIFORNIA 92093-0116

November 30, 1995

San Diego County Board of Supervisors
1600 Pacific Hiway
San Diego, CA 92101

Honorable Supervisors:

I write to support the position of "Save our Forests and Ranchlands" with respect to the now approved "Oaks at Descanso" project.

By way of introduction, I am a Professor and recent past Chair of the Department of Biology at the University of California at San Diego. My fields of specialty are ecology, evolution, and conservation biology. I have published over 90 books and articles in scientific journals. I have experience in reviewing ecological management issues. I was selected by the Ecological Society of America to review the management plan for the California Spotted Owl prepared by the National Forest Service. I have served as a panelist for the National Science Foundation and I have organized three international symposia on biological issues. In 1994 I was nominated for President of the American Society of Naturalists. In the course of my teaching, research and community activities, I have become well acquainted with statewide and regional planning efforts for the conservation of biological diversity in California. I was asked by US Fish and Wildlife Service to serve on an ad-hoc scientific review committee for the MSCP mapping effort and members of the NCCP scientific review panel have sought my advice on several issues relating to reptile species in the NCCP area. I am the recipient of several grants and contracts for research related to reserve planning and management issues on Southern California reptiles and amphibians. I am a founding member of the Scientific Advisory Board for the National Center of Ecological Analysis and Synthesis (created by the National Science Foundation). I am also a native of Southern California and have lived in San Diego Co. for 17 years. I am very familiar with the specific biological resources in the Cleveland National Forest.

The project site lies in a critical geographic position at two different spatial scales. At the largest scale, the Cleveland National Forest and associated protected public lands form a figure eight shape with the narrow ishmus connecting the two lobes situated near interstate 8 in the Descanso region. Both to the north and to the south the public lands fan out into wider and much more

expansive areas. Open space in this critical narrow center piece represents a particularly important habitat linkage for the long term viability of the forest system. This voters of San Diego Co. in recognition of the value of the forest overwhelmingly passed the forest initiative on the 1993 ballot to protect forest inholdings by zoning them at only 1 dwelling unit per 40 acres. This proposed recreational vehicle park goes against the spirit of this initiative. Within the Cleveland National Forest, oak woodland, particularly Englemann oak woodland, lies mostly in unprotected private lands leaving a gap in the public protection of this rare and sensitive species and habitat type. Oak woodlands are used as feeding and hunting sites by mule deer and mountain lions. A statewide search of California Fish and Game data revealed that 1 amphibian, 6 mammals, and 12 birds are restricted to hardwood forests in California.

At a smaller spatial scale, now concentrating within the quadrangle of Descanso, the project site contains fields, oak woodland and a stream bordering the Cleveland National Forest on the east and south. The stream crosses under Hiway 79 through a wide concrete spillway, at least 6 ft tall. Large mammals may either cross the hiway directly or use this covered and hidden passageway to cross safely cross highway 79 without attracting attention.

My inspection of the periphery of the site, although brief (approximately 1 hour) and in late summer, a poor time to observe wildlife, revealed general agreement with the species lists compiled in the EIR. The old field has been heavily grazed and contains primarily exotic grasses and dove weed. The riparian habitat and Oak forest, however, is in excellent condition. I also noted several discrepancies with the biological report of the EIR. I saw numerous individuals of the federal C2 species, coastal whiptail lizard, Cnemidophorus tigris multiscutatus, (not observed in the EIR) moderate (not limited) sign of mule deer activity, and active use by coyotes.

I also question certain specific conclusions of the EIR that the high density of recreational vehicles would be unlikely to lead to problems with depredations of wildlife by pets. This argument is based on an assumption that users of a recreational park are transient and most would not be traveling with large dogs and cats. I know of no data on the the frequency of pets accompanying vacationers in RVs. I think that a plausible argument could be made that the the overall high density of people, even if transient and even if associated with a lower percentage of pets, would lead to a greater absoulte number of pets per unit area. Moreover, it seems plausible that pets in unfamilier surroundings would likely become disoriented and wander compared to pets raised and maintained in familier home surroundings. I feel that the sanguine conclusions of the EIR on this subject are not warranted without additional data on these speculations.

Many of California's oak woodlands have declined substantially in both extent and quality. They are continuing to decline under pressures of agricultural conversion, cutting for fuelwood, urbanization, and livestock grazing. Fire suppression programs have allowed conifers to displace

oaks in many places. White oaks (like Engelmann oak) are particularly becoming rarer because they are not regenerating well. Unlike Live oaks, which sprout after being cut, white oak seedlings and saplings are more heavily impacted by browsing. Consequently in studies of seedling recruitment, survival rates are often less than 0.1%.

Oak woodlands can not easily be recreated by planting seedlings because it is the older oaks in the stand, which are decaying, that contain broken limbs and holes, used as nesting places for many protected migratory birds and large raptors. A study on Tejon ranch in Tehachapis revealed 34 resident bird species in breeding season and 63 species of migrants occupying these oak stands. Studies of large raptors in San Diego Co. have shown that human presence causes nest site abandonment. Many smaller passerines and woodpeckers which nest high in trees limbs or cavities, forage in thick brush in the understory. Thus even oaks left intact within a residential setting will loose much of their biological value for fostering supportive wildlife.

I encourage you to preserve and protect this habitat and the many valuable biological resources that it harbors.

Sincerely,

Ted J. Case
Professor of Biology

PS. I have no personal property remotely affected by the proposed development. Also, the opinions, conclusions, and recommendations expressed here are my own and not necessarily those of the University of California or its Regents.

c: Nancy Gilbert, USFWS
William Tippets, Calif. Dept. of Fish and Game
Duncan McFetridge, SOFAR

Southern California Chaparral Field Institute
the voice of the chaparral

May 11, 2005

Dear San Diego Planning Commission,

I am writing in reference to the proposed 62.3 acre recreational vehicle park near the community of Descanso, California. The purpose of this letter is to explain how the area's biological resources have changed since the project's environmental reports were originally completed and the 2003 Cedar fire. After investigating the site on May 10, 2005, I have come to the conclusion that the Cedar fire created new and significant environmental concerns that need to be seriously considered when evaluating the proposed project.

The Cedar fire damaged a large amount of habitat and cover for many sensitive species in the region where the project is located. According to the California Department of Forestry and Fire Protection, 150,273 acres of chaparral burned, along with 15,498 acres of oak woodland. Those areas unburned within and adjoining the fire scar remain critical for wildlife health and recovery. Guatay Moutain, the dominant feature in the area, was untouched and is the site of one of the few old-growth stands of chaparral left in the county. At the present time a female mountain lion (*Felis concolor*) being monitored by colleagues of mine from the University of California at Davis is making extensive use of the chaparral on Guatay Mountain. The proposed project adjoins the western boundary of the mountain and will create intensive human activity where none now exists. Such activity is likely to have significant implications for wildlife using the mountain, as it will increase the possibility of mountain lion/human contacts, predation of pets, and further constriction of available habitat for lions. With fewer places for mountain lions to go in the area due to the Cedar fire, special attention should be paid to any project that may negatively impact remaining habitat. The same holds true for the other species that depend on the habitats present on the project site—mule deer and birds in oak woodlands and the coast horned lizard in open chaparral. The habitat available to them has been reduced, and any action reducing it further requires serious consideration.

In addition to possible wildlife impacts, creating an intensive use area near one of the county's last old-growth chaparral stands will significantly increase fire danger to this unique natural resource. Fire frequency has been increasing steadily over the past century in San Diego County in lock step with population growth. Embers from camping activities, cigarettes, ignition of dry grass through clearing efforts or automobile use will all increase the risk of wildfire.

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www.californiachaparral.com

In the past, old-growth chaparral has been incorrectly regarded pejoratively as "decadent" or "unnatural." This view is now changing as biologists have more closely examined the life cycle of many chaparral plant species, fire records, and successional patterns based on specific fire regimes. Rather than "needing" to burn, old-growth chaparral stands remain dynamic and healthy ecosystems and represent our state's most distinctive natural plant community. Fire protection is a critical component in protecting remaining stands of old-growth chaparral.

In the earlier environmental report on the project, it was concluded that since the site was on the western side of Guatay Mountain, the fire threat to this resource was reduced because the predominant fire spreading winds come from the east. In fact, when the Cedar fire burned in the area around the proposed project it was being pushed by winds from the west, not the east. The mountain was not engulfed in flame primarily because well trained USFS hot shot crews were able to extinguish threatening spot fires on the western side.

Finally, the loss of so many large, heritage oaks in Cuyamaca State Park and surrounding areas due to the Cedar fire makes those remaining especially valuable. At the center of the proposed project grows an immense coast live oak (*Quercus agrifolia oxyadenia*). Very few of these older individuals remain. One of the last near the Paso Picacho Camp in the state park was destroyed in the fire. The impact of road, trenching and ground compaction outside the canopy of this tree is unclear and should be revisited in light of the destruction of other specimens.

Although it is likely more recreational vehicle facilities will be needed to meet a growing population, it would be prudent to site these types of developments in areas that will not adversely effect the natural environment as this proposed site has the high probability of doing.

Sincerely,

Richard W. Halsey
Director/Lead Biologist

P.O. Box 545, Escondido, California 92029 - 760.822.0029
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Website: www.californiachaparral.com

Richard W. Halsey earned undergraduate degrees from the University of California, Santa Barbara in Environmental Studies and Anthropology in 1978. During graduate work at UC Berkeley he received teaching credentials in life, physical and social science and later a Master's degree in education. He taught physics and chemistry in a private institution, later moving to the public school system to teach biology. Over a period of fifteen years, Mr. Halsey developed a successful field biology course focusing on chaparral and coastal sage scrub ecosystems. He was awarded San Diego City School District's Teacher of Year in 1991 and a Christa McAuliffe Fellowship in 1993.

After teaching biology and natural science for twenty years, Mr. Halsey left traditional education in 1998 to become a full time chaparral ecologist and to promote an appreciation for California's chaparral environment. Halsey's current research projects include post-fire plant population changes, effects of fuel age in brushland wildfire behavior (a joint study with the USGS), and the impact of increased fire frequency on the chaparral ecosystem. He works with the San Diego Museum of Natural History and the San Diego Fire Recovery Network, an association of scientists, fire and land managers, and concerned citizens who have come together to help develop long term fire management and education programs. Halsey coordinates education and research efforts through the Southern California Chaparral Field Institute. His most recent publication is the book "Fire, Chaparral, and Survival in Southern California."

Selected PUBLICATIONS and current RESEARCH

- Post-fire chaparral shrub seedling mortality. Field study in progress.

- Type conversion of southern California chaparral. Field study in progress.

- Chaparral fuel age in relation to fire front movement. Field study in process.

2005. Fire, Chaparral, and Survival in Southern California. Sunbelt Publications, San Diego, CA. 188 p.

2004. Book Review. D. Carle. 2002. Burning Questions. America's Fight with Nature's Fire. Madrono 52: 76-78.

To: San Diego County Board of Supervisors 4/20/05
From: Descanso Community Water District
Ref. The Oaks RV Park

We, the undersigned representatives of the Board of Directors for the Descanso Community Water District [DCWD], would like to take this opportunity to reiterate a long-standing concern we have relative to construction of The Oaks At Descanso RV Park.

It has been stated in the County of San Diego Planning Report for The Oaks project dated March 5, 2003 that the intention is to sink two groundwater wells pursuant to the project and draw upon existing groundwater aquifers to the magnitude of 9.3 acre feet for the first three years, followed by an ongoing yearly maximum of 6.5 acre feet. A stipulation has been proposed that if demand exceeds 5.0 acre feet, monthly production updates will be provided for County review, to the point that if 6.5 acre feet of consumption is approached, all usage except for on-site maintenance shall be ceased and the proposed park shall be closed. As a result of this, it could be assumed that any transient tenants would relocate themselves elsewhere.

It has been further stated that the demands for groundwater usage by The Oaks project to the levels recommended is indeed supported by hydrogeological studies of local groundwater resources. Numbers in the area of 45 to 70 acre feet of storage have been offered, with anticipated recharge from rainfall and stream discharge varying annually from 9.3 to 23 acre feet.

As district board members, we question whether or not the existing needs of the DCWD were included in this hydrogeological study.

It is our perception that groundwater science is inexact. Historical research, test boring, and perhaps below-surface radar assessments involving extensive costs over long periods of time can provide additional levels of confidence in the GUESSES made about groundwater, but we suspect that there is no way to know for sure of the actual aquifer characteristics. As such, we submit that placing the primary water source for 314district customers who have no other source than this district in jeopardy on behalf of a smaller transient RV park population that has the ability to go elsewhere if there is a problem is questionable at best.

The DCWD is currently operating off of only one commercial well [#5] located at 9542 River Drive, as has been the case for many years. A newer secondary backup well [#6] is located further east at 25027 Viejas Boulevard, but it has never been allowed to operate on a regular basis owing to the fact that filtration requirements for iron and manganese changed since the original River Drive well was installed. This implies that the district must fund and provide a filtration system in order to bring this secondary well on-line for regular usage, which will reduce the demand on the River Drive well by distributing the system load over a larger groundwater area. In the long term this would hopefully reduce risk of shortages during drought conditions for the district. So far, the district has been unable to provide adequate funding for filtration of #6 despite exorbitant rates and service chargesplaced upon the subscribers, and we continue to pursue alternative funding sources such as grants. As such, we are operating at risk without filtration and backup, and will be continuing to do so indefinitely until the project is adequately funded.

This perceived risk became reality in 2002 when it became necessary to perform an emergency rework project upon the River Drive well. The water table became dangerously low during the recent drought conditions, which mandated lowering of the pump by approximately 63 feet at a cost to the district of approximately $17,804. During the period of rework, a temporary permit

was granted by the County Health Department to operate the Viejas Blvd. well despite lack of filtration, but such permit was immediately rescinded upon completion of the rework project, relegating the Viejas well back to dormant status

The current static water level in the #5 well is at 86 feet with the pumping level at 227 feet, which represents a significant margin over earlier levels, undoubtedly owing to the most recent rains. By comparison, the pumping level at the end of last summer was only about 13 feet above the pump, which suggests a dangerously low margin of operation. Having a backup almost becomes a moral imperative.

The Viejas Blvd. secondary well #6 is within eyesight of the proposed location for The Oaks At Descanso RV Park, suggesting that the wells to be drilled at The Oaks could tap into the same aquifer. However, what is not within eyesight is the extent of those below-ground aquifers that will be required to support this collective demand, whether they are interconnected or independent, and what their individual sizes and capabilities are.

Documented yearly production [usage] fromwell #5 [which is, again, the primary well, and the ONLY well] over the last 3 years has been in the range of 90-110 acrefeet. It may be worthy to note that #5 is adjacent an active riverbed. Unfortunately, what we do not have is any similar historical data on well #6 since it has never been on-line for long enough to derive any decent historical data. Several weeks worth of emergency backup service does not establish any trends nor much confidence in the ability of the aquifer [or aquifers] feeding well #6to keep up with demand. Furthermore, well #6 is in the middle of a meadow, and hence not likely to have anywhere near the production capability of well #5. The bottom line is that the presenceof The Oaks RV Park with its two wells could present significant jeopardy to the only backup resource that the DCWD currently has. Best case, diversion of the existing groundwater to other uses could ultimately place this district well in jeopardy for requiring a similar level of costly rework as #5 in 2002 to sink the pump even lower, perhaps to involve re-drilling for lower depth if necessary, and if even possible. Worst case, the well could go completely dry, thereby completely negating the original district investment. This would imply starting over for backup purposes somewhere else within district boundaries at great expense. In context, this is not perceived by board members to be an acceptable situation.

We as private citizens do support individual property rights. Additionally, we as DCWD board members are not necessarily opposed to development. However, we do question the valueadded of such a project that would appear to place undue jeopardy upon a community water district that has been beleaguered over the years with a plethora of financial problems. Compounding our existing financial burden of the need for filtration in addition to general system maintenance with the potential for additional risk on the very groundwater we rely on for district supply is NOT a satisfactory condition that anyone in our situation should have to tolerate

As such, we would urge reconsideration of at least the hydrogeological issues, if not theOaks project in its entirety, relative to our stated point of view along with the presumed similar point of view of our 314 customers.

Respectfully submitted,

Alan L. Sawyer
President, DCWD

David J. Somes
Vice President, DCWD

SAN DIEGO TRACKING TEAM

July 28, 2005

Duncan McFetridge
SOFAR
P.O.Box 475
Descanso, CA 91916

Dear Mr. McFetridge,

At your request San Diego Tracking Team (SDTT) has completed a one-time wildlife track and sign survey of the area surrounding the triangular piece of property known as "Oaks at Descanso" (Oaks property). Our survey included the use of remote movement triggered cameras to help verify animal movement through the area. I will detail our findings in this letter and its attachments.

Overview:

We found a healthy, vibrant ecosystem characterized by a variety of habitat types including oak woodland, grassland, oak riparian, chamise chaparral, and scrub oak chaparral all blending in a way that complements the contours of the land. The contours are quite varied in a relatively small overall swath of contiguous land with much diversity. There are cattle grazing in the area, which has a definite impact on the more open areas, but our findings indicate that this does not preclude a great amount of wildlife movement. Also despite the fact that this time of year is a low movement time for many species, we did find much evidence of movement, fresh and historic, suggesting that this is a corridor for transit of a variety of species.

As an example, a finger canyon veering southwesterly spills down toward the Oaks property from a high valley which in turn connects open land that heads toward I-8 to the south with animal underpasses to Japatul Valley and Pine Creek Wilderness areas. This high valley had many signs of a variety of mammals including lion, bobcat, deer and coyote.

We visually and aurally noted a very active variety of birds including raptors such as Red Shouldered Hawk, Barn and Great Horned owls and we found many owl pellets indicating this area rich in rodent prey. Indeed, we found rodent sign everywhere we looked.

There are many trunk trails (not used by cattle) that obviously carry a variety of species through the various habitats and many smaller runs link with these trunk trails. Given the orientation and historic tracks and sign along these trails that occur, in some cases, in very dense growth areas, we have further

evidence of significant movement through this ecosystem that suggests this area supports a major wildlife thoroughfare.

Methodology:

We first surveyed the side of the property bound by Highway 79. Any clear tracks or sign were noted on the data sheet (encl 1) and GPS coordinates were taken for each observation. Both sides of the road were walked and examined. This same method was used on the north boundary (encl 2) and the east and south boundaries (encl 3). Off the road we ranged farther back and forth from the boundary as a function of trails and to better assess the usage of the area by mammal species on our list. We obtained permission to conduct our work from the US Forest Service upon whose land most of the survey was done (encl 4)

Three cameras were placed along wildlife trails, one in the vicinity of the east boundary and the remaining two along the south edge of the property

Findings:

Tracking conditions were not the best since there had been some thundershowers recently. Despite that there was ample sign found indicating much wildlife activity. Along the road there is much coyote activity. We found a road kill raccoon and were surprised to find ringtail cat tracks and long tail weasel tracks and den entrance. We found gray fox tracks and historic deer scat. This along with clear evidence of rodents, cottontails, ground squirrels and small rodents each time a key species observation was made.

Off the road we found an even healthier diversity as well, section 2, the shortest, held sign of mule deer, both fresh and historic, coyote, wood rat, gray fox and raccoon. Section 3 was rather long with much variation in terrain and habitat types with evidence of a very active ecosystem including mule deer fawns and doe, coyote, bobcat, raccoon, wood rat, and cougar. The data sheets (encl 1-3) show these species and the GPS coordinates where the sign was found. The photos confirm deer, bobcat and a roadrunner among others.

Conclusions:

As mentioned above, the area in question is quite dynamic and vibrant, with a healthy diversity of habitat types supporting a variety of species along a north south orientation geographically conducive to wildlife movement as well as providing core habitat. Despite poor tracking conditions and the low movement season we found clear evidence of a wide variety of species that happen to be indicators of a healthy ecosystem.

I hope this report will be useful to you, please contact me at 619-892-7620 if you would like further elaboration on our work in the area.

Best regards,

Barry Martin

Barry Martin
Founder/President
San Diego Tracking Team
Enclosures (4)
BM

SAN DIEGO NATURAL HISTORY MUSEUM

POST OFFICE BOX 1390, SAN DIEGO, CALIFORNIA 92112
EL PRADO IN BALBOA PARK • TELEPHONE 619 232-3821
OPERATED BY SAN DIEGO SOCIETY OF NATURAL HISTORY FOUNDED 1874

Mr. Cliff Strong, Environmental Management Spec. II
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Roberts Ranch Specific Plan 90-001 Draft EIR

Dear Mr. Strong:

I offer the following comments as a biologist as well as concerned citizen and resident of Japatul Valley. I have studied the vertebrate fauna of this area for many years, and am in a position to respond to the biological section of the Roberts Ranch Draft EIR.

For the past five years I have compiled lists of vertebrate species (amphibians, reptiles, birds, and mammals) that occur as residents or migrants in Japatul Valley. My inventory is part of a long-term research project on the dynamics of the chaparral and oak woodland communities of San Diego. General surveys have been made during every month of the year, in addition to detailed catch/release studies on a 10-acre field site located approximately 5 miles south of Roberts Ranch. Hence, my data are a useful baseline by which to judge the completeness of the biological survey performed for the Roberts Ranch EIR.

The Roberts Ranch biological survey was conducted over 7 days of field reconnaissance. The authors acknowledge that such a brief examination would not likely reveal all of the species present, which is certainly an understatement, but more importantly a listing of species alone does not address the more profound issues of population biology that are relevant to decisions effecting land use. As to species diversity permit me to point out the following:

I have recorded eight species of amphibians (frogs and salamanders) on my 10-acre site, whereas the EIR found none and expected three.

I have identified twelve species of lizards, the EIR found four and expected five others (the State-listed Coast Horned Lizard, Phrynosoma coronatum blainvillei, is indeed present, as is the Silvery Legless Lizard, Anniella pulchra).

Four species of snakes were expected by the EIR, whereas my field data have confirmed the presence of at least 16 species, including the protected San Diego Mountain Kingsnake Lampropeltis zonata pulchra.

The EIR identified 56 species of birds, and five species of mammals (with four others expected), whereas I have recorded 84 species of birds, and over 20 species of mammals.

These comparisons are particularly revealing in view of the fact that my data are based on a 10-acre field site, as opposed to the more complex 714-acre Roberts Ranch. However, my objective is not merely to point out the shortcomings of the EIR faunal list, but to emphasize that the region is a mecca of biological diversity which cannot be fully appreciated without long-term, detailed studies of its constituent species. Populations of many species expand and contract in response to a host of natural environmental influences such as seasonal variation in temperature, rainfall, food availability, and reproductive success. Most populations do not recover locally when their habitat is lost, they simply contract and eventually become extinct.

Long-term field studies are essential in order to understand the natural rhythm of our chaparral and oak woodland communities. Despite the considerable amount of information that has been accumulated thus far, much remains to be learned about the home-range ecology and breeding requirements of most of the species that occur in this unique habitat. Seen in this light, "mitigation" in the form of preserving habitat within a disturbed area is a meaningless concept. We have seen time and again that housing developments and human-impact have a devastating effect on local wildlife, regardless of actions to preserve contiguous natural areas. The reason for this is simply that humans and their commensals, like cats and dogs, are unnatural predators that ignore the intentions of open space protection.

I hope you will consider the Roberts Ranch EIR, indeed the project itself, as something not in the best interest of San Diego County. Nowhere else in North America is there such a concentrated diversity of environmental communities, and of these none is more peculiar to our region than the chaparral and oak woodlands. Others, like the coastal mesas and canyons, have all but disappeared. We all recognize that monied interests and housing development exert tremendous pressure on San Diego, but alternative solutions can be found that will balance the realistic needs of population growth with maintaining our natural heritage.

Sincerely,

Gregory K. Pregill, PhD
Curator and Chairman
Department of Vertebrate Zoology

January 7, 1991

cc: Duncan McFetridge

UNIVERSITY OF CALIFORNIA, SAN DIEGO

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO SANTA BARBARA · SANTA CRUZ

DEPARTMENT OF BIOLOGY

LA JOLLA, CALIFORNIA 92093

January 23, 1991

Mr. Cliff Strong
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

I am writing to comment on the draft EIR for the proposed Richards Ranch development in Japatul Valley. Since 1985 I have conducted research on the effects of habitat fragmentation on native wildlife in San Diego County and believe I am qualified to comment on the biological section of the EIR.

I believe the report underestimates the potential of this project to encourage further development within the Cleveland National Forest. The Forest Service map of the Palomar and Descanso Ranger Districts reveals that approximately twenty percent of the area within the forest boundaries, south of Interstate 8 is privately owned. The Richards Ranch inholding is part of an arc of private land which virtually isolates the Sweetwater River drainage from Pine Creek. If this project is successfully and profitably completed it will surely encourage other landowners to follow a similar path. The consequences of this for the ability of the southern Cleveland National Forest to continue to support viable populations of the indigenous vertebrate fauna would be significant. Biologists are aware that most animal species are not comprised of a single continuous population, but by a complex of multiple sub-populations referred to as a metapopulation. These subpopulations are separated spatially by physical barriers in the landscape or by areas of unsuitable habitat. They are linked by the movements of individual animals, immigration and emigration. The variability inherent in nature often causes one or more of the subpopulations to go extinct. However, the habitat once occupied by these subpopulations can be recolonized by migrants from the surviving subpopulations. Subpopulations can blink in and out without the entire metapopulation disappearing. If, however, the subpopulations cannot exchange migrants the viability of the system as a whole is greatly reduced. If individual sub-populations cannot be recolonized the metapopulation will gradually decline as one by one the sub-populations irreversibly disappear. The

development of private inholdings in the Cleveland National Forest with development that is less permeable to animal migrants than the present land uses will help to reduce interchange between the subpopulations of many vertebrate species. This may over time result in the loss of species from areas of the National Forest.

Fragmentation of metapopulations has apparently led to the decline of several animal species in San Diego County including mule deer, mountain lion, California gnatcatcher, and the coastal subspecies of the cactus wren. We have learned the hard way that many species require continuous tracts of habitat to maintain viable populations.

In addition to the fragmentation question I would like to comment on the onsite impacts of the proposed plan. The biological report supports the view that the proposed development would enhance the value of the site as wildlife habitat because cattle grazing would be eliminated. I do not find this argument at all convincing. Granted, as the EIR documents, cattle have severe impacts on natural ecosystems. However, the effect of development on adjacent open space may be equally severe. The trampling hooves of cattle will be replaced by mountain bikes, horses, lawn mowers, and human feet. Other activities which will negatively impact the open space are plant and animal collecting by residents, and gathering of downed timber for firewood. I do not believe that these activities can be adequately regulated by a homeowners association. The report also underestimates the role of domestic cats and dogs as predators on native wildlife. The results of previous research would predict that populations of snakes, lizards, birds, and rodents on the adjacent open space will be negatively impacted. Anyone who doubts the negative effect of development on the usefulness of adjacent open space as habitat for sensitive species need only look at the open space canyons in Hillcrest and Mission Hills.

In some regards the document underestimates the value of this property as wildlife habitat, and omits discussion of several sensitive animal species. For example no mention is made of the possible impacts of development on mountain lions. National Forest employees regularly detect mountain lion sign in the adjacent Pine Creek Wilderness Area. Given the enormous home ranges of mountain lions it is almost certain that this property is a significant part of the home range of at least one individual.

Finally, I question the open space provisions in the plan. The open space is on privately owned parcels and I see nothing in the specific plan to secure that this land will remain unmodified. Also, on the project map the open space is labeled as wildlife corridor. There is no discussion of whether this open space will function effectively as a wildlife

corridor (i.e. facilitate the movement of animals through the site) or what areas of the property wildlife presently use as corridors. These considerations should guide the placement of corridor open space.

My research into the effects of habitat fragmentation leads me to believe that development of this property threatens the ability of the southern Cleveland National Forest to support viable populations of native vertebrates. This impact should be explicit in any discussion of this project.

Douglas T. Boiger, PhD
Post-doctoral Research Fellow

THE FOLLOWING FACTS GIVE SUBSTANTIAL CAUSE FOR REJECTION OF THE OAKS @ DESCANSO RV PARK ON HIGHWAY 79 DUE TO THE SERIOUS THREAT TO OUR FRAGILE GROUNDWATER SYSTEM:

- The County's central mountain subregional plan map average rainfall reflects 24 inches as average for our area. This information goes back to 1933. The Descanso Forest Service more recent rainfall history over the last 30 years (1972) reflects an average of 25 inches per year with 20 of the past 30 years experiencing considerable rainfall deficit. This means the area has a slightly larger deficit than what the county records reflect.

- According to Todd Brown, General Mgr of California American Water Company which operates the Descanso Water District, this **area does not have an unlimited water supply.** The water table has dropped & many local wells are drying up. The Descanso Water Dist well was drilled again and the pump dropped 100 feet. They have approximately another 100 feet they can go. Mr. Brown relayed that drying wells are definitely a problem in the east county.

- In the Descanso Comm Water Dist letter of 9/7/93 to the county Dept of Planning & Land Use the water district expressed its serious concern over the potential degradation of the groundwater supply due to build-up of pollution levels from commercial disposal practices. If the aquifer is contaminated or overdrafted the damage is irreversible

- In the June 7, 2002 letter to Descanso residents from California American Water Company, Mr. Brown warns residents of the very serious water shortage and a recent history of rainfall shortages. He advises all customers to take measures immediately to reduce water usage. (See attached copy).

- On June 18, 2002 the Board of Directors of the Descanso Community Water Dist passed ordinance No 02-06-01 to adopt a water conservation plan for the district.(Copy of ordinance and plan description is attached.) A copy of the 1993 water district letter is available upon request.

- On July 4th 2002 two large pumps were turned on to fill the Descanso water tanks. It was so slow the pumps were not turned off until September of 2002. (Source, Maureen Brown, who was a board member of the Descanso Water Dist).

- I spoke to four of the local well drilling company owners on Feb 24 & 25 2003. In summary of those conversations all four of them basically related the same opinion that the water level in the east county is the lowest it has been in years. On average 17 of 20 wells in Descanso specifically are going dry (Mr. Butler). The severely depleted groundwater supply is not being replenished because much of the rainfall we do get runs off into the ocean and does not soak into the ground. (Sources: Morrison Drilling, Butler's Drilling, Frank's Drilling and Manos Drilling).

- All of the area creeks, ponds, and rivers including the Sweetwater River have been bone dry for several years. This includes all of the adjacent areas. The last year of substantial rainfall was six years ago in 1997.

- Los Caballos Horse Camp has closed its showers; Thousand Trails is warning its customers of the water shortage & has outlined water conservation rules for the campers. (Copies of flyers attached).

- A compilation of information by local resident C.D. and Penny Bryant reflect (including sources) the water conditions of Julian, Cuyamaca Lake (down ½ - 2/3rds of normal capacity), Thousand Trails @ Oakzanita on 2nd well and Loveland Lake (down 60 feet). (Copy attached).

-

- The proponent's geological report is grossly outdated and does not reflect the current groundwater emergency situation.

- The proponent's plan includes the planting of 286 trees in the RV park. This is incongruent with the current conditions. The existing tress in the area are dying. To establish and sustain 286 new trees

is absurd due to the serious water shortage conditions. This is in addition to a swimming pool, Jacuzzi , laundry room, cafeteria, two to three homes, a meeting hall and 85 RV spaces!

- According to the Dept of Water Resources investigations indicate that California has been subject to droughts more severe and prolonged than those witnessed in the brief historical record. For example a 1994 study of relict tree stumps rooted in present day lakes etc suggested California sustained two epic drought periods extending over more than three centuries.

- Based on a USA TODAY article entitled **Southern California feeling drought's squeeze**, "The effects of drought are more pronounced in mountain communities that depend on local wells and are nestled among think, drying forests."

- Based on just the small amount of information put forth in this document relative to groundwater in Descanso and its adjacent areas it is clear that a commercial enterprise of any size would likely result in degradation to the groundwater resulting in damage to the community residents and livestock.

- THERE IS **NOTHING** THAT JUSTIFIES GAMBLING WITH THE HEALTH OF ANY COMMUNITY'S WATER SUPPLY ESPECIALLY A MOUNTAIN COMMUNITY. FURTHERMORE, THE DESIRES OF ONE INDIVIDUAL SHOULD NEVER PROCEED TO THE DETRIMENT OF A COMMUNITY.

- THE COUNTY SHOULD CONDUCT A VERY THOROUGH COMPREHENSIVE STUDY OF THE CURRENT WATER CONDITIONS IN THE AREA. WHEN THE WATER SUPPLY IS SERIOUSLY THREATENED IT DOES NOT MAKE SENSE TO USE MORE WATER.

Thank You,
Sheri Minix
Descanso Planning Commitee

Descanso Treasury

Year	July	August	September	October	November	December	January	February	March	April	May	June	Total
1972	0	0.02	0.53	3.1	4.4	4.63	3.94	5.42	9.14	0.57	0.23	0	31.88
1973	0	0.63	0	0.06	2.03	0.47	6.82	0.2	2.87	1.13	0.08	0	14.29
1974	0.41	0	0.15	5.06	1.64	1.9	0.41	2.71	7.39	3.55	0.36	0.22	23.8
1975	0.04	0	0.96	0.33	2.97	0.3	0	7.92	3.89	3.94	0.12	0.07	20.48
1976	2.12	0	1.45	1.42	1	1.92	3.64	0.81	3.1	0.4	3.45	0	19.31
1977	0	1.8	0	0.9	0.4	5.16	9.85	9.31	11.05	3.55	0.5	0	42.52
1978	0	0.02	0.01	0.02	4.64	6.2	10.39	4.95	8.79	0.3	0.5	0	36.72
1979	0.27	0.05	0.14	3.22	0.55	0.84	16.22	15.98	5.18	2.47	1.4	0	46.32
1980	0.13	0	0	1.18	0	0.1	1.79	3.71	6.22	1.92	0.16	0	15.21
1981	0.03	0.01	0.2	0.52	1.76	1.16	7.39	4.49	9.97	2.26	0.42	0	28.21
1982	0.04	0.4	1.06	0.31	7.4	4.66	4.45	9.03	12.62	3.32	0.52	0	43.81
1983	0	4.26	0.63	0.47	3.44	4.59	0.38	0.06	0.06	1.39	0	0.06	15.34
1984	2.92	4.09	0.02	0.65	2.67	5.97	2.01	2.22	1.58	0.69	0	0.2	23.02
1985	1.61	0	0.03	1.16	8.52	1.98	0.68	5.21	7.28	0.22	0.01	0	26.7
1986	0	0	1.67	2.75	0.95	2.15	3.41	1.22	2.5	1.01	0.18	0.34	16.18
1987	0	0	1.12	3.52	2.43	3.1	5.2	1.66	1.03	4.72	0.48	0	23.26
1988	0	0.53	0.06	0	1.75	3.62	1.31	3.11	2.82	0.27	0.8	0	14.07
1989	0	0	0.57	0.56	0.12	0.09	5.25	3.39	1.97	1.34	0.88	1.19	15.36
1990	0.09	0.01	0.35	0.08	1.54	2.71	1.19	2.85	15.59	0.37	0.07	0	24.85
1991	0.24	0.01	2.37	1.77	0.44	4.08	3.55	5.24	6.39	0.73	0.22	0	25.04
1992	0.3	3.75	0.06	1.15	0.11	5.41	22.28	9.26	2.78	0	1.9	0.96	47.96
1993	0	0.1	0	0.23	3.02	1.89	2.55	5.74	4.81	3.43	0.26	0	22.03
1994	0	0.54	0	0.44	1.89	1.84	13.98	6.17	11.44	2.73	2.59	0.88	42.52
1995	0.04	0.15	0.63	0.02	0.27	0.82	2.48	5.08	4.01	0.96	0.03	0	14.49
1996	0.38	0.09	0.01	1.33	2.44	3.61	8.17	2.5	0.04	0.2	0.06	0.23	19.06
1997	0.01	0	1.95	0.34	3.36	4.42	3.89	15.43	11.79	5.03	2.59	0.23	49.04
1998	0.2	0.1	0.29	0.17	3.75	2.47	2.58	1.53	1	4.1	0.03	0.74	16.96
1999	0.81	0	1.72	0	0.01	0.37	1.38	6.63	1.96	1.13	0.05	0.03	14.09
2000	0	0.04	0.37	1.29	1.47	0.05	4.24	4.85	2.74	2.95	0.05	0	18.05
2001	0.14	0	0.09	0	1.64	2.58	0.74	0.31	2.12	0.72	0	0	9.2
2002	0.07	0	0.66	0.09	3.98	4.49	0.34	5.79					15.64
Average	0.317742	0.535484	0.587742	1.036774	2.277097	2.696129	4.855161	4.899667	5.404333	1.347333	0.591333	0.169667	25.29567

California-American Water Company

Coronado District
1019 Cherry Avenue • Imperial Beach, CA 91932-1609
(619) 575-1106 • FAX (619) 575-2070

June 7, 2002

Dear Descanso Customer:

The Descanso Community Water District (DCWD) is facing a potentially very serious water shortage this summer. San Diego County is experiencing its lowest recorded rainfall in history and at least two years of below average rainfall. This is likely the cause of the 33% reduction in production that the District is experiencing from its only permitted well. At the same time, the amount of water being used by DCWD customers during the first five months of 2002 is up by more than *40%* over the same time period in 2001.

The Board of Directors will be considering the adoption of a Water Conservation Plan at its next meeting on June 18, 2002. However, I believe that the situation is serious enough that all customers need to begin taking measures immediately to reduce usage. Enclosed is a copy of the proposed Plan and every customer should immediately avoid using water for nonessential uses.

The DCWD is making preparations to investigate methods of improving production from its permitted well. However, there is no guarantee that these efforts will be entirely successful. DCWD is in the process of requesting permission from the Department of Health Services to place a standby well in service temporarily during the periods of time that the permitted well is being worked on. The standby well produces water that is much higher in iron and manganese. All customers must be prepared to experience periods of discolored water when the standby well is online. Because of timing and coordination issues it will not be possible to notify each individual customer immediately prior to the activation of the standby well.

The simple fact is that while water supplies have fallen off due to lack of rainfall, the District's customers have been using more water than ever. Usage must be reduced to match the available supply.

Sincerely,

Todd Brown

Todd Brown
General Manager, Descanso Community Water District

Enclosure

ORDINANCE No. 02-06-01

AN ORDINANCE OF THE DESCANSO COMMUNITY WATER DISTRICT (DCWD) FOR THE PURPOSE OF ADOPTING A WATER CONSERVATION PLAN FOR THE DISTRICT

WHEREAS, from time to time the water supplies of the DCWD may be insufficient to meet normal customer demand, and,

WHEREAS, the Water Permit issued by the State Department of Health Services requires the DCWD to have a water conservation plan in place for such situations,

NOW, THEREFORE BE IT ORDAINED BY THE DESCANSO COMMUNITY WATER DISTRICT that the attached Exhibit A, "Water Conservation Plan" be adopted.

This ordinance shall become effective immediately.

The implementation, duration and/or rescision of the Water Conservation Plan will be enacted by Minute Order of the Board of Directors.

PASSED AND ADOPTED by the Board of Directors of the Descanso Community Water District this 13 day of June, 2002, by the following vote:

AYES: 5 - Cox, Brown, La Plante, Lockett, Siciliani
NOES: 0
ABSENT: 0
ABSTAIN: 0

ATTEST:

Robert Siciliani, President DCWD

Carroll Wright, Secretary DCWD

Equestrian Camp at Descanso
Claudia White [cwhite@meusd.net]
To: Environmental Review
Cc:

Dear Ms. Miner,

Thank you for coming to the planning group meeting at Descanso. I wanted to express my concerns as a long time Descanso resident as well as a teacher at Descanso Elementary rather than a planning group member, although these roles are all interconnected.

My first concern is traffic in the area. As a teacher at the elementary school I worry about any increase in area traffic and the danger that poses to our students. Especially large vehicles that have more difficulty seeing pedestrians and cyclists. I also walk back and forth along the route on my way to work. Visibility in the morning and evening are particularly bad due to the sun's angle blinding drivers on the east-west route.

My second concern is dust. Presently the ground cover of the grassy marsh area keeps dust to a minimum. As a long time horse owner I know horses' hooves however chew up the ground rapidly as well as campsite that would be dirt. Vehicles driving in and out of that area would generate intolerable amounts of dust that would affect the school and library.

My third concern is flies. No matter how hard you try to keep a livestock area clean large amounts of flies will become a health and comfort issue for anyone in the area.

My fourth concern is ground water pollution due to both feces and urine from the animals as well as septic or dump stations. This is a VERY marshy area when we receive normal rainfall. While we are under drought conditions you may not have noticed this. In past normal rainfall year I have walked in the area and sunk up to my knees. This would make runoff and leaching problems quite severe.

My fifth concern is the meadow/marsh area. So few areas were spared by the Cedar Fire and the impact has dramatically changed our end of the park. Every area is precious! I have personally observed red shoulder hawks and kites hunting this meadow on a regular basis. There is a small pack of coyotes that live and breed as well as hunt in this meadow. Hiking and riding along the Merigan Fire Road trail through the meadow reveals many varieties of animal tracks including raccoons and snakes. While these

animals as a species our not endangered, the horse camp would remove one of the few remaining healthy, unburned habitats in our area. This does not seem to fit with the ideals of a State Park! I have often used this area so close to our school as a wonderful resource to teach preservation and respect for wildlife and the environment. What kind of message will this project send to my students?

My sixth concern is the proximity of this facility to a residential area. Mizpah Lane and River Road residents as well as Viejas Blvd. residents would all be adversely affected by dust, traffic, and noise.

I agree that we need a horse camp. But the problems one in this location would generate are simply too much to justify it.

Thank you for your time,
Claudia White

From:	Carlson, Karen M&O [kcarlson@powayusd.com]	Sent:	Fri 6/22/2007 2:42 PM
To:	Environmental Review		
Cc:			
Subject:	Merigan and Paso Picacho proposals		
Attachments:			

I just wanted to say that I am very excited about these projects and thank you all for your efforts in getting areas open and available for use in our area! I know you are aware we'd like to see more available ***horse camping*** for sure, but thank you SO MUCH for all of your work!

We look forward to assisting you in the future with these and other projects.

Thank you!

Karen Carlson
Operations Supervisor
(858) 679-2593
8-801-2593

* TRUSTWORTHINESS ** RESPECT ** RESPONSIBILITY ** FAIRNESS ** CARING ** CITIZENSHIP *

ruth D'Spain
P. O. Box 173
Descanso, CA 91916

Karen Miner, Project Manager
Southern Service Center, CA Dept of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

SUBJECT: **PROPOSED** MERIGAN RANCH AREA EQUESTRIAN CAMPGROUND, DAY-USE FACILITIES AND TRAILHEAD STAGING.

I am **objecting** to this proposed project for the reasons listed to follow.
This is Descanso's only Meadow, it is a wetland and must be preserved as such.
Environmentally, this plan would be a disaster for Descanso and its residents.

1. Loss of the Meadow and wetland.
2. Traffic in the area would overload the existing road system, many times making the simple act of getting to one's home almost an impossible feat, especially regarding the tributaries to Viejas Grade Drive.
3. Disaster regarding the wells downstream with the contaminants of animal urine and manure.
4. Extreme fly conditions at the Descanso Elementary School the Descanso Library and the surrounding neighborhood.
5. Noise and dust will greatly effect the Descanso Elementary School, the Descanso Library and surrounding neighborhood.
6. Contaminants into the Sweetwater river and the Descanso Creek (San Diego Watershed).
7. Not in keeping with Neighborhood Character as described in the Central Mountain Subregioal General Plan.
8. Destroy the view of the meadow and open space for all Descanso residents, particularly those situated on Mizpah Lane and Mizpah Spur.
9. Degradation of the protected view shed regarding a designated thruway as outlined in the Central Mountain Subregional General Plan.
10. Traffic would endanger the students, teachers, bus drivers, and parents delivering students to and from school.
11. Nitrate build up already exists in a like area as shown in the Maggio Ranch EIR comments, and will harm existing nearby water source for the community, the Descanso Elementary School, and nearby wells.
12. Situated in a designated high groundwater area, activity may not take place on the meadow.
13. Planned landscape has not been thought out. The Descanso Library is testimony to the lack of plant material that will grow near a meadow wetland. The high winds and extreme cold and make up of the area do not allow such plantings. This information can be verified.
14. Nearby documented archeological sites can not be protected. Since this is an issue at Los Caballos, it would be the same issue at this site.

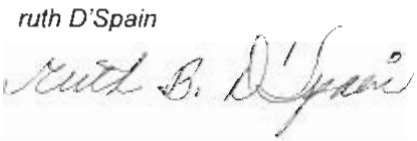
15. Air quality in the Descanso basin from dust would be dangerously compromised, especially in the case of the Descanso Elementary School and the Descanso Library. You cannot expect the existing human population to suffer breathing problems for the pleasure of a few.
16. The amount of human activity planned would compromise the few emergency services available to the Descanso residents.
17. No cell phone service available in this area for emergency need.
18. No public services available in the area.
19. The noise element of the General Plan of the Central Mountain Subregional Plan will be compromised. Noise carries to an extreme in this amphitheatre like area. The noise carried to the nearby homes and the homes on Mizpah Lane, Mizpah Spur will be unbearable. The noise will be carried to the surrounding hillside homes in Descanso as well It will destroy the ambiance of our quiet area. The reason we live here. I reside in a home on the opposite hillside on Summit Lane. I can clearly hear individual laughter from the school grounds. I once heard my own granddaughter's unmistakable laugh. A nice sound, unlike what your plan entails.
20. This area will NOT percolate for septic use. How do you propose to take care of human waste? Septic systems will not function in this high ground water area. How do you propose to drain shower facilities?
21. WATER: Where will your water wells be placed, and how can you guarantee no water table loss to the community. Drought is more often the norm than not in Descanso. Our Descanso Community Water is situated nearby and feeds the majority of the residents in the nearby vicinity. Are we to forgo our water for the campers from outside the community? How will you regulate water use.
22. FIRE DANGER: Having lived through the Cedar Fire, we are, as a community, very cognizant of fire danger. How will you prevent "accidental" human caused wildfire. This is the most dangerous aspect of this entire plan. Our homes, once again, put in danger for a horse camp.

This plan appears to be hastily put together in order to pacify the desire for an alternative plan to Los Caballos horse camp, at the cost to an entire community. The California State Park does not have the right to conduct itself in this unseemly manner. It is the case that many folks own land in the Descanso area as does the State Park , however may not use it any way they wish. Our Community General Plan must be adhered to, just as the Park has a General Plan which needs to be adhered to.

The Mack Ranch property was purchased in good faith by the Cuyamaca Rancho Foundation (CRF) to provide these facilities, yet it lay fallow. We are now told no trails can be put there, although locals have ridden those trails above and through the Mack Ranch for over 50 years. During the purchase process no person of expertise gave information regarding the trail use. There is a huge problem with letting the CRF work to purchase the land for the expressed use of a Horse camp, day use, etc., then abandoning any plans to do so. There is a problem with using tax payers money to move on to a vastly more costly plan in a place where the land use is not compatible with the community plan.

This proposed project was not well thought out. It is a hurried plan fabricated to placate a small number of the population using the California Rancho State Park.
No thought has been given to the environmental damage to the only meadow in the region.
No thought has been given to the impacts upon the existing human use surrounding this area.
This plan will not hold up to environmental regulations nor the existing General Plan of Descanso.

ruth D'Spain



From: Nancy [nellis2@cox.net] Sent: Tue 6/12/2007 8:54 PM

To: Environmental Review
Cc: Marty CVMP McIlhenney
Subject: Cuyamaca Equestrian Project
Attachments:

Cuyamaca Rancho State Park
Equestrian Facilities Project

I attended your open house in Descanso at the Town Hall on June 12, 2007. I do have a lot of concerns. But first I will let you know I have been camping in Cuyamaca State Park since 1947. I have camped at Green Valley Falls, Paso Picacho, Lao Caballos and Los Vaqueros. I started camping at horse camp in 1956 with the last time being this past weekend at Los Vaqueros. I love the area and the trails.

I have a few concerns about putting the camp ground in Descanso as listed below:
Against:

1. Merrigan land is marsh land and floods frequently. Camp ground needs to be on or near the Daily Ranch that was purchased by the state Park.
2. Camp ground is to close to residential
3. Camp Ground to close to the school
4. To far from trails around the Stone Wall area
5. I liked the plan #2 for the camp ground but did not like the arena and round pens in the center of the camp area. This would stir up to much dust for the campers.
6. No arena would be needed- people are there to camp and should train there horse at home not when camping. If arena is a must then it needs to be down wind from campers.
7. Needs at least two restrooms/ showers with that many camp sites
8. Keep the camp ground simple to keep camping fees down to an affordable fee
9. Put overflow corrals in the center area instead of arena and round pens.
10. Losing Los Caballos after camping there since the 50's is totally not fair. We have just as much right to be on that land as the Indians. We do not want a casino there.

Pros:

1. New camp area is diffidently needed
2. Paso Picacho day camp #2 looks good. Needs to have day use corrals
3. Paso Picacho would be good place for equestrian camp ground

Equestrian riders want to preserve Cuyamaca State Park and should have access to it as we have for the past 50 or 60 years. I think we deserve to keep it and have a camp ground that is useable for generations to come.

Respectfully yours
Nancy J Ellis
nellis2@cox.net

PS. I would like to volunteer for making new trails in the park

To Karen Miner, Project Manager

I'm writing in response to the proposed Equestrian Campground near the community of Descanso. This is not a good choice for the campground for many reasons. The proposal states that the site is near Descanso. Not true, it is in Descanso. Vehicles, camping trailers and trucks with horse trailers would have to drive through the middle of town on a quiet country road where residents walk, bike and horse ride. The site would form a triangle with the elementary school and the library. This is not where a campground should be. There would be dust and flies. Campground noise well into the night would carry to the many residents who live nearby. The horse trails at the south end of the park are very limited unlike the trails at the north end where horse camp should be and always was. Cuyamaca State Park campgrounds should be entered into off of highway 79, not through the small town of Descanso. The proposed site sits in a pristine meadow that needs to be left intack. There are other places within the park for an equestrian campground.

Please, do not put a campground in the middle of Descanso.

Terry Gibson

Terry Gibson
9452 hwy. 79
Descanso, Calif. 91916

1. [illegible]
2. Heather Jones
3. [illegible]
4. [illegible]
5. Michelle [illegible]
6. [illegible]
7. Kathleen M. Gibson
8. Stella M Burrows
9. Debbie Barnett
10. Robert Burrows
11. [illegible]
12. [illegible]
13. Gene Pauly
14. [illegible]
15. [illegible]
16. [illegible]
17. [illegible]
18. Shirley James
19. [illegible]
20. David Christenson
21. Nick George
22. Teresa Gooch
23. Maurice [illegible]
24. [illegible]
25. [illegible]
26. Tera Anderson
27. [illegible]
28. [illegible] W. Perry
29. Maureen Anderson
30. Cory Rushing
31. Larry [illegible]
32. Cody Walker
33. Lenden [illegible]
34. [illegible]
35. [illegible]

#36. Jed Andersen
#37 Todd J Salmons
#38 Carolyn Kerr
#39 Kelly Salmons
#40 Brent A Miller
#41 Makrah Salzano

(reelled org

To Karen Miner, Project Manager

I'm writing in response to the proposed Equestrian Campground near the community of Descanso. This is not a good choice for the campground for many reasons. The proposal states that the site is near Descanso. Not true, it is in Descanso. Vehicles, camping trailers and trucks with horse trailers would have to drive through the middle of town on a quiet country road where residents walk, bike and horse ride. The site would form a triangle with the elementary school and the library. This is not where a campground should be. There would be dust and flies. Campground noise well into the night would carry to the many residents who live nearby. The horse trails at the south end of the park are very limited unlike the trails at the north end where horse camp should be and always was. Cuyamaca State Park campgrounds should be entered into off of highway 79, not through the small town of Descanso. The proposed site sits in a pristine meadow that needs to be left intack. There are other places within the park for an equestrian campground.

Please, do not put a campground in the middle of Descanso.

Terry Gibson
9452 hwy. 79
Descanso, Calif. 91916

From: Susan Lancaster [mailto:lilylarkspur@hotmail.com]
Sent: Wed 8/8/2007 7:52 AM
To: dianne.jacob@sdcounty.ca.gov; assemblymember.anderson@assembly.ca.gov; Environmental Review
Subject: Against Proposed Horse Camp at Merigan Property in Cuyamaca State Park

Susan K Lancaster-McGourty
9788 River Drive , Descanso CA 91916

July 29, 2007

To Whom it May Concern:

I am a resident of Descanso, California, and have been horse back riding in the Cuyamaca Mountains for the past 56 years. I live on a neighboring ranch that would be negatively impacted by the opening of a horse camp on the Merrigan site in Cuyamaca State Park. I also have grave concerns for the environmental impact and the safety of the potential riders and horses if this site is used.

First, let me elaborate on the negative impact to my property and to other neighboring properties. The Miller Ranch borders the proposed horse camp and we are across the street from the Millers. If the horse camp is put in we will be impacted with huge amounts of dust pollution as the prevailing winds would come across the dirt areas that once were grass fields and cover our homes, barns and livestock. We would be affected by the adding of lights that would keep our livestock up all night as the field naturally has no lighting. We would experience huge increases in traffic at our intersection and the additional people and animals would create a huge amount of noise pollution as this is a very quiet rural neighborhood. There would be an elimination of the owl and hawk inhabitants of that field and our rodent populations would increase. The increase number of horses and manure would increase of fly situation. Does the state have a fly prevention program? The surrounding horse ranches use a monthly fly abatement program along with fly traps and sprays which are quite costly, is the State going to do this? If no then the fly impact will be significant and out of control.

Secondly, I feel that as a trail rider for 56 years I am very familiar with the trails in the park. All of the campers at the proposed site would be asked to begin at the trailhead and immediately proceed up "Cardiac Hill". Does the name tell you something? One of the trail choices is called "Dead Horse Trail" Also not an easy trail ride. Lots of horse campers are looking for short family friendly rides, much like the ones at the old Los Caballos campground. I have many fond memories of my childhood and my children's childhoods at that campground as we went every year at least twice. The wonderful thing about it was the many trails that one had access to and could ride for a couple of hours. The Merrigan site will require riders and horses to travel first up a very hard incline which will seriously injure any horse that is not in good condition. It will also require that riders ride for at least 3-4 hours before reaching any of the really excellent riding trails in the state park. Most campers are looking for a 2 hour ride. There are only two choices after climbing the big hill and so all of the campers will be on the same trail every day. The traffic of all those campers going up and down the Cardiac Hill will be bad, but multitude of riders meeting on the 2 foot wide Dead Horse Trail will be downright dangerous.

Thirdly, I would like to suggest a different solution that might please everyone. Why not add overnight camp site corrals to a portion of Paso Picacho campground. This would give riders access to all the beautiful trails in Cuyamaca with less cost and less impact on the residents who live next door to the Merrigan site. The at the Merrigan site set up addition parking at the already existing parking spot and add day camp corrals and water supply at the Merrigan site. You could even put in some flat land trails around the meadow that would only be 6 feet wide and not cause too much dust not night time noise. These beginner trails would allow people to ride without going up the hills nor on the rocky trails and would also allow for people who drive carts pulled by horses to enjoy the trail. It could be a rural Central Park kind of trail horse back riding park.

In reading the Initial Study of Environmental Impact the following were listed as Potentially Significant Impact and are a great concern to us as residents and potential neighbors of the proposed project:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially degrade the existing visual character or quality of the site and its surroundings.
3. Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use.

4. Create a substantial permanent increase in ambient noise levels in the vicinity of the project.
5. Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project.
6. Create a substantial increase in traffic, in relation to existing traffic, and the capacity of the street system.
7. The project would have impacts that are individually limited but cumulatively considerable.

The reviewer in her comments states that the land was farmland and in not being currently farmed but is significant because the site is Farmland of Local Importance and would be removed from the rapidly diminishing agricultural land available in San Diego County. She also states that building this campground at Merigan site would adversely affect the scenic view of Highway 79 by degrading the route which is classified as a first priority scenic route in the San Diego County General Plan. She writes that there are several species that are state or federally listed as delicate. She states that because of the sandy soil, it is on a creek, the land will have to be compacted and fill brought in. This sounds like the land will be greatly and adversely affected. She comments that the increase in campers and activities will increase the risk of fire in the area.

I hope someone in the decision a decision position will read this and pursue gathering more information from the directly impacted neighbors of this proposed site.

Please feel free to contact me for more input or if I can provide and further information.

Sincerely,

Susan K. Lancaster-McGourty

Susan K Lancaster-McGourty M.A. Ed.D.
aplusteacher.com
PO Box 1463 Alpine CA 91903
River Oaks Ranch
9788 River Road Descanso CA 91916

July 13, 2007

Karen Miner
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego Drive, #270
San Diego, CA 92108

Dear Sir or Madam:

I am writing this letter to state my concerns regarding the new equestrian facilities project at the Cuyamaca Rancho State Park, located in Descanso, CA. My husband and I have just finished our new home located in Descanso. We are moving from the city, to Descanso on Mizpah Spur, for a quite, natural, and undisturbed environment.

I would like to state for the record that I strongly oppose the development of the proposed facilities. I refer you to all the new residences and older residences surrounding the proposed site. We are all depending wells for our water source. Our water system would be jeopardized with the development of this new site.

We currently enjoy the calm and quite atmosphere when we overlook the meadow and park below us. This would all change with the noise that travels from the valley.

There is also an elementary school within very close proximity to this area. The consumption of alcohol close to this school would have a negative impact on our children.

This is the classic situation where residents must battle to maintain our environment. The California State Parks (CSP), acknowledged experts in the field, need to look at other locations that would prove to have less impact of the families already living in the area. Do we have strong enough grounds for rejecting this project?

Sincerely,

Carly and David Maritz
9714 Mizpah Spur
Descanso, CA 91916
(619) 992-3494

This message was sent with high importance.

From:	Brenda Miller [bjmiller49@msn.com]	Sent:	Wed 7/11/2007 5:01 PM
To:	Environmental Review		
Cc:			
Subject:	Proposed Horse Camp		
Attachments:			

July 11, 2007

Ms. Karen Miner
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego Drive #270
San Diego, CA 92108

Via facsimile and email

Ms. Miner,

We recently attended the June 12 Public Information Workshop at the Descanso Town Hall. We received a letter notifying us of the meeting long after the meeting was held, June 20. Only because of concerned equestrians did we know of the workshop and attended.

As horse owners and members of Pine Valley Mountain Riders, we agree that there is a need for a horse camping facility at Rancho Cuyamaca State Park. However, the location at the south end of the Park (Merigan) is NOT a suitable or desirable site for numerous reasons.

- The area is a rural residential area with homes rimming the meadow where the camp is proposed
- The desired camping environment does not include seeing lights of homes, children playing on the playground, school bells, noise from adjacent homes (pools, music, dogs, animals). Peace, solitude and more isolation is desirable.
- The flat, unspoiled meadow is a beautiful gift of nature and should be left that way.
- The meadow turns to a marsh in the winter and is hazardous for riding.
- The ecosystem would be damaged and upset by the presence of people, corrals, building of any sort. The meadow is natural habitat for numerous species of animals, friend and foe alike.
- The trails most people want to ride are about 5 hours from this site and are a true representation of the scenic rides for which Cuyamaca is known. The lower trails are hot and dusty.
- There is no need for an arena or round pen in a camping area.

- The residents will be impacted by increased traffic, dust, noise, flies and smoke from campfires.
- There is an Indian archeological site in the meadow.
- There is no natural shade due to the lack of trees.

The camping site would be more accessible if entered from Highway 79 and away from the city of Descanso.

Thank you for your efforts in developing a horse camping site at a different location.

Sincerely,

Brent A. Miller Brenda J. Miller

9727 River Drive Descanso, CA 91916

Make it a great day,

Brenda J. Miller

Rancho Bellisimo

Equine Essentials - Nature's Way

9727 River Drive, Descanso, CA 91916 ~ ph: 619.445.2071 fax: 619.659.0032

From:	Jerry [jerrymorey@yahoo.com]	Sent:	Tue 7/10/2007 11:37 PM
To:	Environmental Review		
Cc:	jerrymorey@yahoo.com		
Subject:	Cuyamaca Equestrian Facilities		
Attachments:			

This letter is to document Cuyamaca State Park's failure to notify me by mail of the meeting held at the Descanso Town Hall concerning the Cuyamaca Rancho SP Equestrian Facilities Project to be located at Descanso. I am very disturbed I was not notified of this meeting. My property is located no more than 400 feet from the proposed facilities. In talking with my neighbors living on River Drive about the proposal, I found out none of them received any notices of the meeting. I have some very important issues I would like to discuss about the proposed facilities. I feel the outreach to the Community of Descanso was a big failure and needs to be addressed. In fairness to the people who live in Descanso this whole issue needs to be readdressed. The only way the issues can be addressed formally is to have a better outreach to the Community of Descanso and have another meeting located at the Descanso Town Hall concerning the proposed project.

Sincerely,

Jerry W. Morey

Karen Miner Project Manager proposed horse camp Rancho Cuyamaca
Donna Pardue [donnapardue@yahoo.com]
To: Environmental Review
Cc:

I am writing in regards to a letter we received about a proposed horse camp here in Descanso.

There is a huge communication problem here in Descanso and I fear many have no idea of this proposal.

1. You may or may not know that Descanso residents no longer receive home delivery of the newspaper. This is a huge disadvantage on our ability to be informed on matters like this, which are of huge interest to us and our lives.

2. The letter we received from your office was postmarked June 19th, informing us of a meeting on June 12th.

3. Then we find out there was a meeting on last Thursday that we could have attended if we had only known it was to take place! I do not understand why that meeting was not on your letter?

4. A huge concern for us also is the water table. We are not on a well and our water is already terrible, dirt in it, and often discolored. having this many more share from our ground source would be terrible.

First of all we loved horse camp. We camped there each summer for many many years. We have been camp hosts at Los Caballos and loved being there. That is a perfect area.

We want another horse near that same area. It did not affect residents, as it would in this area.
A horse camp at the proposed site here in Descanso would be terrible! Horse camps are wonderful,they just need to be far from residental areas, even small rural ones.

The traffic, noise and invasion of people would be a terrible violation of our peace and quiet. Horse camps should not be placed in residental areas. Having worked as a camp host I know how much traffic and how many people would desend on us. I can imagine the dust and dirt covering us now if this happens.

I respectfully wish to be informed about any future meetings. My neighbors are also very upset about being notified after the fact. We need to have a say in something that would affect our lives so greatly.

Sincerely,

Max & Donna Pardue
24928 Viejas Blvd.
Descanso, Ca.91901
619-445-9300

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Merigan Ranch, Descanso
Joyce A. (Merigan) Peterson
Office 858-453-6088 Fax 858-453-1356 Cell 619-884-6088
jpeters1@san.rr.com

June 16, 2007

Supervisor Dianne Jacob
County Administrative Center
1600 Pacific Highway
San Diego, CA 92101

RE: Equestrian Facilities Project, Cuyamaca Rancho State Park

Dear Supervisor Jacob;

My family enthusiastically supports the proposal for an equestrian campground, day-use facilities, and trailhead staging area in Descanso. As you know, this project is located on the property that the Merigan family donated to the State of California several years ago.

My brother Bob and I were in attendance at the County workshop on June 12, when the information was presented to the people of Descanso. We want to commend your Staff for a well thought out and attractively designed presentation of the proposal. Staff members were especially receptive to the community comments and suggestions.

Although some of those in Descanso are against any new proposal, my brother and I came to the conclusion after the workshop that any negative aspects of the project are easily mitigated. The Merigan family intended our property donation to the State of California to be used by all the people and not just the privileged few. The Equestrian Facilities Project is the right project in the correct location, and we are thrilled to lend our enthusiastic support for its approval.

I have included a letter from our family that was given to Staff for display at the June 12th workshop. Please contact me if you want to discuss the Merigan's position on this proposal in detail.

Sincerely;

Joyce A. (Merigan) Peterson

cc: Descanso Planning Group

JOYCE A. PETERSON
8675 Nottingham Place
La Jolla, CA 92037
Office 858-453-6088 Fax 858-453-1356 619-884-6088 cell
jpeters1@san.rr.com

TO: Dept of Parks
ATTN: Karen Miner
Fax: 619-220-5400 enviro@parks.ca.gov

RE: Equestrian Facilities/Merigan

Pages: 2

Merigan Ranch
P.O. Box 362
Descanso, CA 91916

The original Merigan Ranch in Descanso consisted of a 2200-acre property that was acquired from the Oliver family in 1958. Around 1973, the Merigan family initiated discussions with government officials concerning their desire to donate the northern part of the ranch to the State of California. This donation earned the support of the San Diego County Board of Supervisors by unanimous vote on September 22, 1975. Subsequent to this vote, the State of California accepted the gift of 1800 acres of Merigan property for inclusion into the Cuyamaca Rancho State Park, opening up direct access to the Park from Descanso.

The Merigan and Peterson families want to lend their enthusiastic support to the proposal for the equestrian campground, day-use facilities and trailhead staging area on their former property. As the parcel was used for pasturing cattle and horses for many years, the proposal will fit well with past agricultural uses. It will make our families very pleased to once again see horse-related activity carried on in this area.

Sincerely;

Joyce A. (Merigan) Peterson

Equestrian Facilities Project, commentary
Larry Pustinger [lpustinger@nethere.com]
To: Environmental Review
Cc: Joyce Peterson
July 10, 2007

Enviro@parks.ca.gov

The Cuyamaca Rancho State Park Equestrian Facilities Project encompasses both a proposed equestrian day use trail head parking facility and equestrian family campground facility.

In my view, both proposals would serve to enhance opportunities for park owners to visit Cuyamaca. Equestrian and non equestrian visitors enjoy riding, hiking, and biking on the parks many trails. For many, the sighting of horses ranks right up there with their sightings of wild land creatures.

Paso Pichaco Equestrian Staging Area

The equestrian day use trail head parking across from Paso Picacho presents a few challenges to assure harmonious and safe results. Safe access off of and back on to highway 79 in that area is quite challenging for all motorists. Operators of slow moving and heavily laden horse trailers would require a longer sight line to assure better safety for all motorists and pedestrians. Pedestrian traffic crossing hgy 79 from Paso Pichaco to access the popular Stonewall Mountain trail is very heavy. Vehicles towing live horses must make slow turns when moving off of or onto highways. These vehicles must also slow down more gradually approaching their exit, and require longer distances to accelerate after re-entering the highway.

Other concerns should be addressed at this location. A fence along the highway which led from the vehicle entrance drive to the vehicle exit point would tend to discourage any loose horse from running out into the highway, further serving to afford a few more seconds to capture a loose horse. While that circumstance may be rare, in this location it could result in tragic results. This area is quite close to the highway and its frightening noises (from the horses perspective), and it has one of the highest numbers of hikers...due to the popularity of Stonewall Mountain trail, and the nearness of Paso Pichaco Campground and day use area.

Signage should exist which both reminds equestrians to be mindful of keeping horse well attended, whether in hand or tied to their trailers. Signage should also urge pedestrians and bikers to not approach horses within the staging area. Some separation of the staging area must be created for everyone's safety.

Equestrian visitors will be tempted to access the toilet facilities across the street. Some might actually leave their horses trailer tied and unattended, this would be irresponsible. Portable toilets within the staging area could make sense.

Equestrian Family Campground, Descanso

It a letter dated January 21, 1986, the Descanso Planning Group expressed its support for the concept of an equestrian campground within Descanso as outlined it the then newly created general plan that resulted from the Merigan annexation. The planning group also expressed its appreciation for the park's willingness to give nearly 4 acres to the Mountain Empire Unified School District and the Descanso Community Water District. Today, that same parcel contains a very nice branch of the San Diego County Library, and it contains the most productive well of the water district serving over 260 local families. This same parcel served to expand the playground and athletic fields of the school and community.

It is my prayer that the good people of Descanso and the current officials of Cuyamaca can once again work together in a continuing spirit of being good neighbors.

Visual concerns...residents and campers would all be well served with plantings of numerous tress. Over time, trees would shield the mutually unfavorable views which the campground and neighboring development provide for each other. A berm may provide some relief if artfully accomplished and landscaped with local shrubs, wildflowers, etc.

Sound concerns...campers must be encourage to polite guests, not only of the park, but of their more immediate permanent residential neighbors. Generators can be banned or discouraged by having electric hook ups at campsites. Electronic devices which employ external speakers should be kept at sound levels which do not carry beyond any immediate camp site.

Park policies regarding fires, charcoal, etc. should be clearly posted and enforced.

A camp host position should be created and maintained. Local residents deserve to have this kind of 7/24 presence to assure that park policies as to camping guests are always honored. I urge the relocation of the present Mounted Assistance Unit camping facility in Descanso, be relocated to the proposed new campground. The presence of this unit would serve to reinforce the campground host.

The park should continue its vigorous program of trash and manure removal that it employs in other locations. Officials need to explain how well this is routinely performed in order to overcome some reasonable fears.

I do not support the installation of a round pen or arena. While it might be an amenity desired by several visitors, it is not a necessity. Permanent residents could be expected to rightly object to the noise and dust attendant to such a facility. In fact, most campers would desire sites that would not be impacted by these same issues.

Efforts should be made to establish an equestrian trail leading out of the campground which could connect to the Dead Horse trail. Such a trail could be established without traversing through sensitive areas. This would make possible a loop course. Results of such a trail would reduce the impact of dramatically increased equestrian traffic upon Merigan Ranch road. Dramatically increased equestrian and vehicle usage of this road will occur in proximate location to permanent neighboring homes. Building a Dead Horse connector will be challenging. If this trail could be built for equestrian use only, as a connector, perhaps it would not have to meet more ridged standards.

Trespass upon private lands may become an expanded problem. It the area where the Sweetwater River exits park lands, private land owners do not have boundary line fencing. No impediment currently exists to discourage park visitors from exiting the park by following the river south and west. Park neighbors in this area have expressed their concerns about visitors, equestrian and pedestrian, leaving the park across their lands. Park planners should consider clearly posting boundary signs in this area. Signs should contain language stating that entering private lands from state park lands is not permitted. A fence within the park, which crossed the river channel could also be considered.

In conclusion, I support the completion of both projects. I am optimistic that legitimate concerns can and will be mitigated. To whatever extent possible, I am willing to assist as a volunteer in construction of the proposed facilities and attendant trails.

Sincerely,

Larry Pustinger, P.O. Box 415, 25008 Manzanita Lane, Descanso, Ca 91919 619-659-3437

Equestrian Facilities in Descanso
trista brant [tristalynn@hotmail.com]
To: Environmental Review
Cc:

Dear Ms. Miner,
My name is Trista Brant and I am a member of the Descanso Planning group but I am speaking as a citizen living in Descanso. I do not think it would be a good idea to put the Equestrian Park in the meadow behind the Library, for several reasons I'm sure you have already heard such as dust, noise, smell, wildlife habitat threatened and so on. I think it would be nice to have one, just not in a residential and school/Library setting. I also would like to share that I have spoken to Joe the owner of the Descanso Feed Store and he is against the facilities also even though his business would benefit from it there he did not feel it was the right place to put it and he wants Los Caballos reopened. Also I read in the Cuyamaca State Park general plan on page 44 that "The meadows are not suitable places for development because of the high water table and persistent dampness". So if the EIR comes back claiming that it is a meadow, and I believe it is seasonally, that by their own statement they cannot build on that land. Thank you for your time and consideration.
Trista Brant

Environmental Review

From: Gary Klockenga [gklockenga@sandiego.gov] **Sent:** Thu 5/17/2007 3 43 PM
To: Environmental Review
Cc:
Subject: Equestrian facilities project, Cuyamaca Rancho State Park ATTN: Karen Miner
Attachments:

Hi Karen,

If an EIR is prepared for this project, we'd like to have a copy. Thanks.

Gary

Gary Klockenga
Government Publications Librarian
San Diego Public Library
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San Diego CA 92101

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