

8 COMMENTS ON THE DRAFT EIR

The following agencies or persons submitted comments on the Draft EIR during the 45-day review period:

Governor's Office of Planning and Research
California Department of Fish and Game
California Department of Transportation
Department of Toxic Substances Control
County of San Diego-Department of Planning and Land Use
San Diego County Archeological Society, Inc.
Courtney Ann Coyle, Attorney at Law
Descanso Planning Group
Ernie Smith-Cuyamaca Equestrian Association
Ruth D'Spain
Joyce (Merigan) Peterson-Merigan Ranch
Terry Gibson
Dianne Jacob, County Supervisor

The letters written by these 13 entities are contained in full with DPR's responses. Of the 13 letters, 4 were opposed to the Preferred Alternative for the Descanso Area Development Phase II project, 2 reviewers were in favor, and six of the letters did not state a position. The remaining letter from County Supervisor Dianne Jacob, which was received after the comment period had ended, was also opposed to the Preferred Alternative for the Descanso Area Development Phase II project.



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

April 8, 2010



Christine Beck
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Subject: Equestrian Facilities Project
SCH#: 2007051074

Dear Christine Beck:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 5, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures

cc: Resources Agency

1-1

State Clearinghouse Data Base

SCH# 2007051074
Project Title Equestrian Facilities Project
Lead Agency Parks and Recreation, Department of

Type EIR - Draft EIR
Description The Equestrian Facilities project includes the following components: (1) conversion of the Green Valley Family Campground Loop A (sites 1-22) to an equestrian campground containing 10-15 sites; (2) construction and operation of a day use staging area (Paso Pichaco Day Use Area); (3) construction and operation of an expanded day use staging area within the site known as Merigan Ranch, referred to in the DEIR as the Descanso Area Development Interim Day Use Parking Areas; and (4) future construction and operation of a new equestrian campground and associated facilities within the Descanso Area Development.

Lead Agency Contact

Name Christine Beck
Agency California Department of Parks and Recreation
Phone 619-220-5300 **Fax**
email
Address 8885 Rio San Diego Drive, Suite 270
City San Diego **State** CA **Zip** 92108

Project Location

County San Diego
City San Diego
Region
Lat / Long
Cross Streets Viejas Boulevard, SR 79
Parcel No.
Township

	Range	Section	Base
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Proximity to:

Highways 79
Airports
Railways
Waterways Sweetwater River, Descanso Creek
Schools Descanso Elementary
Land Use Cuyamaca Ranch State Park

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Geologic/Seismic; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 02/17/2010 **Start of Review** 02/17/2010 **End of Review** 04/05/2010

Letter 1: Governor's Office of Planning and Research

Comment No.

Response

1-1

The Governor's Office of Planning and Research acknowledges the Department's compliance with the requirements for draft environmental documents, pursuant to CEQA.



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
<http://www.dfg.ca.gov>

ARNOLD SCHWARZENEGGER, Governor
JOHN MCCAMMAN, Director



April 5, 2010

Ms. Christine Beck, Environmental Coordinator
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Subject: Comments on the Draft Environmental Impact Report for the Cuyamaca Rancho State Park Equestrian Facilities Project, San Diego County, California (SCH# 2007051074)

Dear Ms. Beck:

The Department of Fish and Game (Department) has reviewed the above-referenced draft Environmental Impact Report (DEIR) for the Cuyamaca Rancho State Park Equestrian Facilities Project. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department offers the following comments and recommendations to assist the California Department of Parks and Recreation (CDPR) in avoiding or minimizing potential project impacts to biological resources.

Cuyamaca Rancho State Park (Park) is located in a rural and unincorporated portion of east central San County. Much of the Park's boundaries are adjacent to open space including Anza Borrego Desert State Park and the Cleveland National Forest. The Park is approximately 24,623 acres in size and is open for hiking, nature watching, camping, mountain biking, and equestrian camping and trail riding. Equestrian facilities available in the Park include Los Vaqueros Group Horse Camp, Hual-Cu-Cuish Day Use Horse Parking Area, and Sweetwater Parking Area. Prior to 2003, the Park also contained the Los Caballos Equestrian Campground (Los Caballos). The 2003 Cedar Fire burned approximately 280,000 acres of land in San County including a large portion of the Park. The fire destroyed or severely damaged 30 of the Park's facilities including the restrooms, cabin, and storage buildings at Los Caballos. Due to constraints involving both cultural and natural resources found at Los Caballos, the equestrian campground was closed rather than redesigned. Beginning in late 2005, CDPR began looking for alternative locations for an equestrian family campground.

The proposed Equestrian Facilities Project would occur at three discrete sites within the Park including (from north to south): (1) an area east of SR-79 in the vicinity of the Paso Picacho Campground; (2) Loop A of the Green Valley Campground, which is west of SR-79 in the southern third of the Park; and (3) off Viejas Boulevard adjacent to the community of Descanso at the southern boundary of the Park. The proposed project includes four components: (1) the conversion of the Green Valley Family Campground Loop A (sites 1-22) to an equestrian campground containing 10-15 sites; (2) the construction and operation of a day use staging area at the site known as Paso Picacho East, referred to herein as the Paso Picacho Day Use

Conserving California's Wildlife Since 1870

Ms. Christine Beck, Environmental Coordinator

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Area; (3) the construction and operation of an expanded day use staging area within the site known as Merigan Ranch, referred to herein as the Descanso Area Development Interim Day Use Parking Area; and (4) the future construction and operation of a new equestrian campground and associated facilities within the Descanso Area Development site. The construction and operation of the Descanso Area Development will be completed in phases and are evaluated in the DEIR at the programmatic level, while the remaining three projects will be evaluated at the project specific level. Phase I of the Descanso Area Development is the construction of the day use area, which would be considered an interim facility until funding for the campground can be secured. Phase II of the Descanso Area Development would include construction of the equestrian campground and expansion of the Interim Day Use Parking Area. Phase III of the Descanso Area Development would require subsequent CEQA review.

The proposed project sites have been situated primarily in areas that have been previously disturbed (former agricultural land and existing campgrounds); however, certain portions of the project will involve removal of a limited number of pine and oak trees. No sensitive animal species that are known to inhabit the project sites. No special status plant species or rare natural communities were identified on the project sites. Least Bell's vireo is not documented to occur within the project vicinity. Dispersal and overwintering habitat for the arroyo toad might possibly occur at both the Descanso Area Development and Green Valley Loop project sites. However, the DEIR states that impacts to arroyo toad are unlikely due to the lack of breeding habitat and adjacent sandy terraces for foraging at the project sites. In addition, proposed avoidance and minimization measures (such as a log barrier around the southern and western portions of the Descanso Area Development designed to direct toads around the campground) would be implemented to prevent effects to the arroyo toad.

Table 2.1 of the DEIR, as well as Section 6.0 of the Natural Resources Report (Appendix C of the DEIR), present mitigation measures and best management practices (BMPs) designed to reduce impacts to sensitive species, vegetation, hydrology, and other aspects of environmental quality. The Department recommends implementation of all of these measures and BMPs, including those that are listed in Section 6.0 of the Natural Resources Report, even if they are not specifically reiterated in the DEIR. To further assist CDPR in avoidance or minimization of potential project impacts on biological resources, the Department offers the following comments and additional recommendations.

2-1

The proposed Descanso Area Development site is an open, flat field primarily covered with non-native annual grasses. A drainage runs north to south through the eastern portion of the site. The proposed project would avoid the drainage to the maximum extent possible. Approximately 25 acres of annual grassland would be impacted by construction of the project (17 acres permanently, and 7.7 acres temporarily). Another 0.93 acres of non-native grassland would be permanently impacted by construction of the Descanso Area Development Interim Day Use Parking Area. Non-native annual grasslands and ruderal areas in San Diego County provide important foraging habitat for raptors. Although the Descanso Area Development site does not provide suitable raptor nesting habitat, it does provide a significant area for foraging. The Department recommends that impacts to 25 acres of annual grasslands be mitigated at a 0.5:1 ratio through enhancement of annual grassland within the Park. CDPR might consider enhancing the unimpacted grassland area directly adjacent to the project site by removal of invasive non-native species, particularly the species of *Brassica* (mustard) that have been noted on site, and revegetation with natives, which could perhaps be performed as an extension of the re-planting with natives that is planned for portions of the project area subsequent to project construction. The enhancement areas could then be

2-2

Ms. Christine Beck, Environmental Coordinator
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monitored along with the revegetated project areas to ensure success of weed control and native plantings.

Trail extensions should be qualitatively monitored on an annual basis to check for the introduction of invasive plant species. If new infestations are discovered, they should be eradicated before they are able to spread into surrounding plant communities. In addition, all trails will need to be patrolled regularly to minimize impacts due to unauthorized creation of new trails, erosion, and trash accumulation. Pedestrian access to redundant and/or unplanned trails should be blocked to promote re-growth of native vegetation.

2-3

As part of the Green Valley Campground Loop A Conversion, a new trail will be constructed in the southern portion of Loop A, and will cross the Sweetwater River and connect to the West Side Trail. The DEIR indicates that construction of the trail crossing and associated bridge will require subsequent CEQA review. The Department will provide further recommendations when the associated CEQA document is circulated for this portion of the project. In addition, for any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, the project applicant (or entity) must provide written notification to the Department pursuant to Section 1600 *et seq.* of the Fish and Game Code prior to initiation of construction of the stream crossing. Based on this notification and other information, the Department then determines whether a Lake or Streambed Alteration Agreement is required. 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 jurisdiction's (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>.

2-4

The Department typically requires that oak trees that are damaged or removed be replaced in kind. Oak trimming should be conducted by or be under the supervision of a licensed arborist with specific knowledge regarding oak preservation. The replacement ratios (using rooted plants in liners or direct planting of acorns) for oak trees that are removed should be as follows:

- a. trees less than 5 inches diameter at breast height (DBH) should be replaced at a 3:1 ratio.
- b. trees between 5 and 12 inches DBH should be replaced at a 5:1 ratio.
- c. trees between 12 and 36 inches DBH should be replaced at a 10:1 ratio.
- d. trees greater than 36 inches DBH should be replaced at a 20:1 ratio.

2-5

The replacement ratio for damaged oak trees less than 12 inches DBH should be 2:1, and greater than 12 inches DBH should be 5:1. All other oaks should be fenced off and tagged to prevent equipment from operating in the drip line of these trees. Oak replanting efforts should utilize locally collected acorns or saplings grown from collected

Ms. Christine Beck, Environmental Coordinator
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acorns. Appropriate understory species should also be included to enhance structural diversity of the mitigation site. The site should be monitored and managed for a minimum of 10 years to ensure success of the restoration effort.

The DEIR states that if project construction activities take place between February 15 and September 15, preconstruction surveys will be conducted for special status birds within 500 feet of new development and that construction will be delayed in a particular area if an active nest is found until the young have fledged. However, raptors may begin breeding as early as January and finish fledging as late as the end of September. For example, the earliest known nest building date for red-tailed hawk in southern California is mid-December. Project sites and adjacent areas should be surveyed for raptor nests by a qualified biologist prior to construction. If an active raptor nest is found, a buffer should be established between the construction activities and the active raptor nest so that nesting activities are not interrupted. The buffer shall be a minimum of 500 feet.

2-6

We appreciate the opportunity to comment on the referenced DEIR. Questions regarding this letter and further coordination on these issues should be directed to Meredith Osborne at (858) 636-3163.

Sincerely,


Edmund J. Pert
Regional Manager
South Coast Region

cc: Meredith Osborne, DFG, San Diego

Letter 2: California Department of Fish and Game

<u>Comment No.</u>	<u>Response</u>
2-1	All of the mitigation measures and best management practices listed in Table 2.1 of the DEIR and Section 6.0 of the Natural Resources Report (DEIR, Appendix C) will be implemented in order to avoid or minimize impacts to sensitive biological resources.
2-2	As stated in the DEIR (p. 93), California Department of Parks and Recreation (DPR) intends to mitigate the impacts to annual grassland at a 0.5:1 mitigation-to-impact ratio. Because DPR has adopted the Environmentally Superior Alternative for this project, a maximum of 3.47 acres of native grassland restoration (0.47 for the day use and 3.0 for the campground) would be required. Currently, the area north of the Descanso Area Development site contains no native grassland component and therefore, DPR staff believes that restoring portions of nonnative grassland at this location would not be appropriate. Instead DPR shall enhance/restore 3.47 acre of nonnative grassland just north of the existing Paso Picacho Day Use Parking area west of SR-79 (Figure 2.4). This area supports both native and nonnative grassland components.
2-3	All trails throughout the Park are routinely patrolled to deter the creation of “volunteer trails” and annually, DPR implements measures to remove and control the spread of nonnative plant species within the Park.
2-4	DPR will obtain all necessary permits including a Lake and Streambed Alteration Agreement, if necessary, prior to the start of construction.
2-5	Although CDFG has no direct jurisdiction over DPR, for this particular project, the replacement ratios given for impacted oak trees in the DEIR have been amended to include the language provided.
2-6	The EIR has been amended to acknowledge the possibility that raptor could nest between 1 January through 15 September.



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi, Acting Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

March 3, 2010

Ms. Christine Beck
Environmental Coordinator
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, California 92108
enviro@parks.ca.gov

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EQUESTRIAN FACILITIES PROJECT, (SCH # 2007051074), SAN DIEGO COUNTY

Dear Ms. Beck:

The Department of Toxic Substances Control (DTSC) has received your submitted draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "The main objective of the Cuyamaca Equestrian Facilities project is to construct amenities that will meet Cuyamaca Rancho State Park's (Park) need for equestrian recreational opportunities. Although the Park supports several horseback riding trails, an equestrian group campground, and two equestrian day use areas, it does not currently have an equestrian family campground. The proposed project includes four components: (1) the conversion of the Green Valley Family campground Loop A (sites 1-22) to an equestrian campground containing 10-15 sites; (2) the construction and operation of a day use staging area (Paso Picacho Use Area); (3) the construction and operation of an expanded day use staging area (Descanso Area Development Interim Day Use Parking Area, and (4) the future construction and operation of a new equestrian campground and associated facilities within Descanso Area Development site. The park is located in a rural and unincorporated portion of east central San Diego County. Much of the Park's boundaries are adjacent to open space including Anza-Borrego Desert State Park and the Cleveland National Forest. The proposed project would occur at three discrete sites within the Park. The Park is approximately 24,623 acres in size and is open for hiking, nature watching, camping, mountain biking, and equestrian camping and trail riding". DTSC has following comments:

- 1) DTSC provided comments on the project Notice of Preparation (NOP) on June 15, 2007; those comments have not been addressed in the draft EIR. Please address DTSC's comments in the final EIR.

- 2) DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies which would not be responsible parties under CERCLA, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

3-2

If you have any questions regarding this letter, please contact Mr. Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov or by phone at (714) 484-5491.

Sincerely,



Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program - Cypress Office

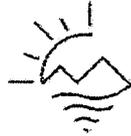
cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

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
ADelacr1@dtsc.ca.gov

CEQA#2825



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzeneg
Governor

June 15, 2007

Ms. Karen Miner
Project Manager
California Department of Parks and Recreation (CDPR)
8885 Rio San Diego Drive, Suite 270
San Diego, California 92401

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.

3-4

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- 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. 3-6
- 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. 3-7
- 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. 3-8
- 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. 3-9
- 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. 3-10
- 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 3-11

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). 3-12
- 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. 3-13
- 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. 3-14
- 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. 3-15
- 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). 3-16
- 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. 3-17
- 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. 3-18

- 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.

3-19

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
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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

Letter 3: Department of Toxic Substances Control

Comment No.

Response

- 3-1 The NOP comment letter and responses to that letter are provided below.
- 3-2 Comment noted.
- 3-3 As stated in Section 4.4 of the DEIR, the Descanso Area Development site was used as a homesteading/cattle ranch until it was purchased by DPR in 1977. Prior to DPR ownership, a County of San Diego (County) Miscellaneous Building Record (1958) indicates the existence of a 550-gallon underground gasoline storage tank at the Oliver / Merigan Ranch Complex (Complex) within the current Descanso Area Day Use site. In 1966, this record was amended to state the tank was above ground. A 1977 DPR document indicates that DPR removed a below-ground gasoline storage tank from the Complex; however no other evidence such as photographs were found. An occupant of the former Complex remembers an above-ground gasoline tank was present (pers. comm. Bob Merigan). It remains unclear whether a below-ground gasoline storage tank was ever present on the site. Both records also indicate a workshop, storage shed, and an implement shed were on site but removed after transfer of the property into State ownership. These buildings may have housed solvents and other chemicals used to maintain ranching equipment. The workshop and storage shed had concrete floors, which were removed at the same time as the buildings. The concrete floors may have prevented the spread of toxins into the soil. However, based on this new information, prior to construction, DPR would hire an outside consultant to test the Descanso Area Day Use site for soil contamination due to past use of the property.
- Both the Green Valley Campground Loop A and the Paso Picacho sites have been in State Parks ownership since 1933. To the best of DPR's knowledge, no current or historic uses of these areas have resulted in a release of hazardous waste and/or substances.
- 3-4 The following databases were accessed on April 5, 2010 regarding the proposed project sites: National Priorities List (NPL), EnviroStor and the County's Hazardous Materials Search. The closest site listed on NPL was the Marine Corps Base at Camp Pendleton approximately 60 miles northeast of the proposed projects' area of potential effects (A.P.E.). The closest site listed on EnviroStor was in Alpine approximately 8 miles southwest of the proposed projects' A.P.E., and the County's website had no sites listed within the Park. There are two above ground gasoline storage tanks located in the Park, one in the maintenance yard at Paso Picacho and one in the maintenance yard at Green Valley. The

County Office of Education also has a gasoline storage tank at Camp Cuyamaca. Although these locations are within the Park, they are outside the projects' A.P.E. Based on these databases, the proposed project sites are not known to be contaminated sites

- 3-5 If the Descanso Area Development site is deemed contaminated, a remediation plan would be developed and implemented. If remediation required oversight by the Department of Toxic Substances Control, DPR would contact the agency regarding an oversight agreement.
- 3-6 Comment noted.
- 3-7 Comment noted.
- 3-8 To the best of DPR's knowledge no contaminated sites are adjacent to the Descanso Area Development site within the town of Descanso. Please see Response 3-4. Only State Park property is within 2,000 feet of the other two proposed projects.
- 3-9 Approximately 1,200 square feet of asphalt will be demolished within the Green Valley Campground Loop A. Existing asphalt paving pieces not reused on site and greater than 1 inch will be taken to an asphalt recycling center outside of the Park. To DPR's knowledge, no hazardous chemicals, lead-based paints or products, mercury or ACMs are currently residing beneath the asphalt pavement, which was installed sometime in the mid 1970s.
- 3-10 No fill from off site will be used during the proposed project. Therefore, no soil testing would be required. Please see Response 3-4.
- 3-11 Comment noted.
- 3-12 - 3-14 Comment noted.
- 3-15 Treatment of hazardous waste is not part of the proposed project.
- 3-16 The following language will be added to Mitigation Hydro-3 (DEIR p. 100): For the Paso Picacho Day Use Area and the Descanso Area Development Phase II projects, a Stormwater Pollution Prevention Plan will be submitted to the State Water Resources Control Board. All wastewater discharge will comply with State standards and guidelines.
- 3-17 Comment noted.
- 3-18 Please see Response 3-3.
- 3-19 Comment noted.

DEPARTMENT OF TRANSPORTATION

District 11
PLANNING DIVISION
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March 22, 2010

11-SD-79
PM 9.27

Ms. Christine Beck
California Department of Parks and Recreation
8885 Rio San Diego, Suite 270
San Diego, CA 92108

RE: Cuyamaca Equestrian Facilities Project

Dear Ms. Beck:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR), for the proposed Cuyamaca Equestrian Facilities project located on State Route 79 (SR-79). Caltrans has the following comments:

Sight Distance calculations should be submitted with the Traffic Impact Study (TIS) showing that the California Department of Transportation (Caltrans) standards are being met as outlined in the Highway Design Manual (HDM). The sight distance calculations should show all existing and proposed trees etc. These should be signed by a Registered Engineer in the State of California. (See attachment).

4-1

Provide truck turning movement diagram for the Paso Park driveway and SR-79. Use the maximum legal vehicle to be accommodated.

4-2

TIS Traffic counts should be updated if over 2 years old. 4-3

Page 11 of TIS - SR-79 speed limit is 55 MPH. 4-4

TIS should use projections for both opening day traffic and 20 years beyond to evaluate impacts and mitigation on SR-79. Include:

- Existing traffic volumes (ADT and peak hour analysis);
- Existing traffic volumes+ project volumes (ADT and peak hour analysis);
- Existing traffic volumes+ project volumes+ other surrounding projects (ADT and peak hour analysis);
- Existing traffic volumes+ project volumes+ other surrounding projects.+ (Opening year + 20) (ADT and peak hour analysis).

4-5

Include missing Traffic Count Data sheet for SR-79/Riverside Drive northbound and southbound. 4-6

Only one access point to SR-79 for Paso Park will be allowed. 4-7

Provide a minimum of 4 feet of paved shoulder along the length of Paso Park. In locations with snow removal operations it is desirable for right shoulders to slope away from traffic in the same plane as the traveled way. This design permits the snowplowing crew to remove snow from the lanes and the shoulders with the least number of passes. Refer to HDM Topic 302. 4-8

Follow the guidelines in the HDM for the design of the driveway (Topic 205). 4-9

Provide a typical structural section detail for driveway for the Paso driveway. Show a sawcut line 1-foot within the SR-79 inside the edge of pavement. 4-10

Advisory signs "Slow Trucks" (W51CA) sign should be placed in the northbound and southbound direction on SR-79 for the Paso Park. 4-11

Identify the Department's right-of-way (R/W) on all plans. 4-12

Signs and pavement markings within the project limits should be evaluated for replacement and/or upgrading on an as needed basis. This evaluation should consider visibility performance, conformance with existing policies, appearance, and legibility for both day and night conditions. The aforementioned items shall conform to the latest 2010 California Manual on Uniform Traffic Control Devices (CA MUTCD). 4-13

Provide Traffic Control Plans for any work within Caltrans R/W. Refer to the Caltrans May 2006 Standard Plans T10 for shoulder closures and T13 for lane closure. 4-14

Reference the postmile on SR-79 for the access road to the Green Valley Campground Loop A on the DEIR and TIS. 4-15

Reference the postmile for the driveway centerline as it intersects SR-79 for Paso Picacho Day Use (Paso) park in the TIS and DEIR. 4-16

In order to make a proper assessment, we need to fully understand the project visual impacts. It appears that mature trees will be removed on the State R/W. We must clearly identify the location and amount of trees to be impacted or removed including any mitigation efforts. Please provide us with a Visual Impact Assessment (VIA). 4-17

We recommend that the environmental documents for this project identify the potential for any environmental impacts to Caltrans facilities, highways and resources that are within the state R/W, and describe measures to avoid, minimize, or mitigate those impacts. 4-18

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits.

4-19

The following is a list of impacts that are typical to Caltrans' facilities, and we recommend that they be addressed if appropriate in the final environmental document for this project:

- Noise
- Air Quality
- Hazardous Materials
- Community Impacts
- Visual/Aesthetic Impacts (including any removal of vegetation or trees)
- Biological Resources
- Cultural Resources
- Water Quality
- Agricultural/Farmland Impacts

4-20

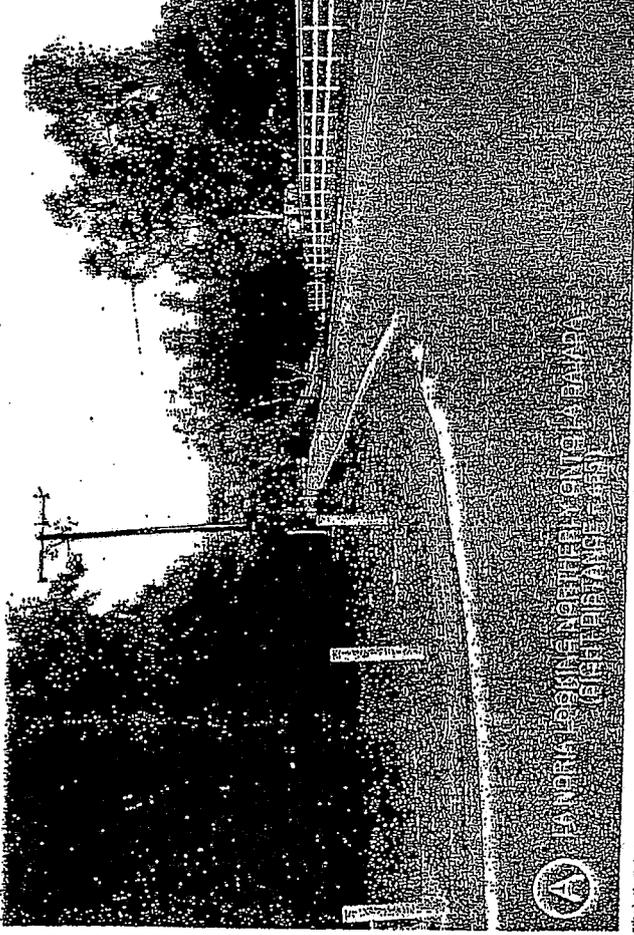
If you have any questions, or require further information, please contact Eric Bassell, at (619) 688-6075 or via e-mail at Eric_Bassell@dot.ca.gov.

Sincerely,

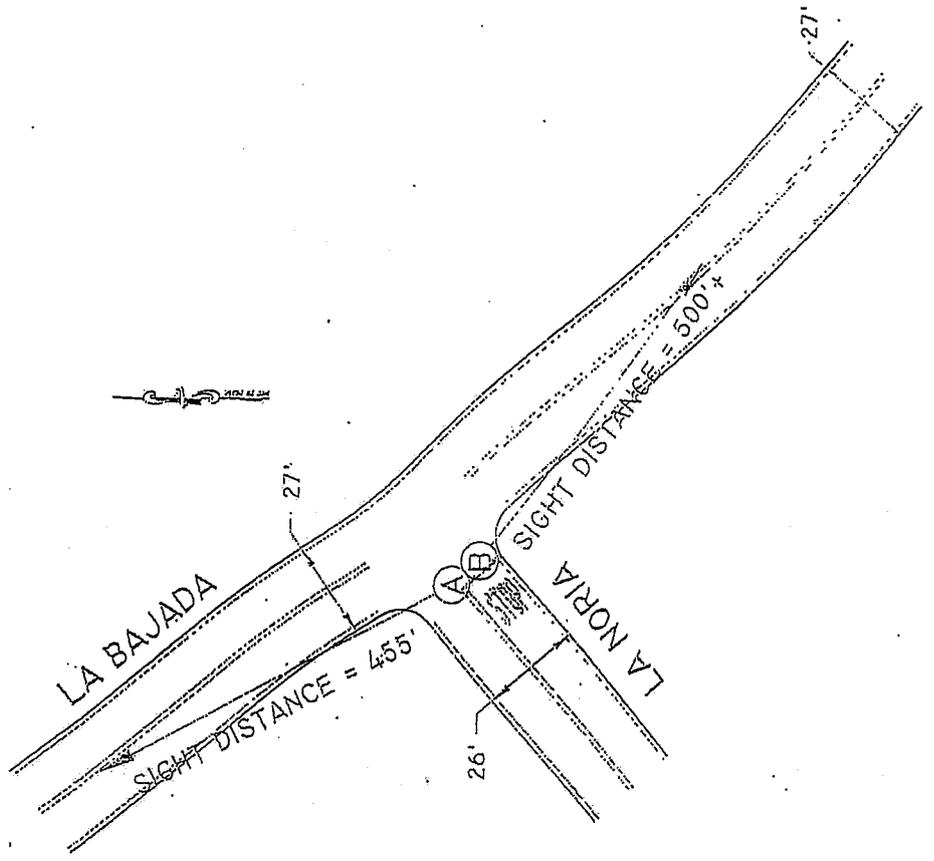


JACOB M. ARMSTRONG, Chief
Development Review Branch

attachment enclosed



NOTES:
 SIGHT DISTANCE WAS MEASURED AT 8' BACK FROM PERCELINE ON LA BAJADA
 POSTED SPEED LIMIT = 40 MPH ON LA BAJADA
 PREVAILING SPEED = 45 MPH ON LA BAJADA



Letter 4: Department of Transportation

<u>Comment No.</u>	<u>Response</u>
4-1	Sight Distances were calculated and a sight distance report will be provided with the encroachment permit application.
4-2	A truck turning movement analysis was performed and will be provided with the encroachment permit application.
4-3	Comment noted. Although the traffic counts were measured over 2 years ago (August 2008), DPR believes the data are still relevant due to limited development within the rural community of Descanso and no development of user facilities within the Park since 2008.
4-4	Comment noted. Corrected speed limit will be used in all design calculations.
4-5	Comment noted. DPR believes the 20 year build-out scenario is not useful in this situation because very little growth and development is likely to occur in the project locations. 20 year build-outs are useful in more urban areas of the County that are experiencing rapid growth.
4-6	The Traffic Count Data sheets for SR-79/Riverside Drive northbound and southbound are included in Appendix B of the Traffic Impact Study.
4-7	Having only one access point on SR-79 would require significantly more grading, the possibility of blasting, and the removal of more trees. Therefore impacts to Aesthetics, Biological Resources, Air Quality, Cultural Resources, Noise, Hydrology, and Geology/Soils would be much greater than what was identified for the Preferred Alternative. Access to the project site will be discussed with CALTRANS during the encroachment permit application process.
4-8	This can be incorporated into the final design and details will be provided with the encroachment permit application.
4-9	HDM guidelines were used during the design of the driveway.
4-10	Please see Response 4-8.
4-11	Please see Response 4-8.
4-12	The Department's right-of-way was surveyed and will be provided with the encroachment permit application.
4-13	Signs and pavement markings will be replaced as necessary for construction.
4-14	Traffic control plans will be provided with the encroachment permit application.
4-15	This can be incorporated into the final design and details will be provided with the encroachment permit application.

- 4-16 Please see Response 4-15.
- 4-17 The CALTRANS right-of-way line was provided and no trees within the CALTRANS right-of-way will be removed at the Paso Picacho Day Use Area. There will be minor grading including the driveway work.
- 4-18 The alternatives were analyzed and the preferred alternative design was determined to have the least amount of impact to the environment. There will be some grading in the Caltrans right-of-way; however DPR believes this will result in a less than significant impact to the right-of-way.
- 4-19 Comment noted. A Final EIR will be provided with the permit application
- 4-20 Comment noted.



County of San Diego

ERIC GIBSON
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

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April 5, 2010

Christine Beck, Environmental Coordinator
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

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

Dear Ms. Beck:

The County of San Diego has reviewed the Draft Environmental Impact Report (DEIR) for the Equestrian Facilities Project dated February 2010. In response to the DEIR 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 continues to recommend the exploration of an alternative location for the proposed Descanso Area Development (Merrigan) campground, due to potentially significant impacts that could result from constructing the project at the proposed location. The DEIR reviews qualitatively an alternate site known as the "Mack Ranch Alternative." However, there is no substantive evidence to back the claim that this site impacts the environment more than the Preferred

Alternative. Further, since Cuyamaca State Park is quite large, it should be possible to find an alternative site that would impact the environment less than that proposed by the Preferred Alternative, as well as meet the project objectives. 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 Descanso Area Development (Merrigan) 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 Descanso Area Development, alternative locations for the project components at the Descanso Area Development should be fully explored in the DEIR.

5-1
(cont.)

2. The DEIR does not analyze the impacts and possible mitigation methods for any of the project alternatives, including the No Project Alternatives. The DEIR provides project descriptions of the different alternatives, but fails to address quantitatively the impacts for all subject areas, for each described alternative. There is no way to compare the impacts of the Preferred Alternative and the project alternatives. Therefore, there is no way to analyze whether the project alternatives reduce or increase impact levels, when compared to the Preferred Alternative. The discussion is incomplete for proper analysis. The DEIR does not comply with the CEQA Guidelines, Section 15126(b) and (d).
3. Within the Descanso Area Development (Merrigan) project description (Programmatic), there is no discussion of a "No Project" Alternative. Therefore, the DEIR is not complete, pursuant to the CEQA Guidelines, Section 15126(e).
4. For both the Paso Picacho Day Use Area and the Descanso Area Development (Phase I) projects, the alternatives are not correctly analyzed, pursuant to CEQA, as the Preferred Project is also designated as the Environmentally Superior Project. The potential impacts caused by the project alternatives are not fully analyzed for these two components of the proposed project.
5. The DEIR presents conclusions throughout that are not fully analyzed quantitatively. Therefore, the conclusions of significance are not supported by factual, substantive data. Examples of this include (not an exhaustive list) Aesthetics, Noise, Air Quality/Global Climate Change, Agriculture, Hazardous Materials, etc. In most cases, there are no technical studies or reports to allow full disclosure of the possible project impacts related to the subject areas found, within the DEIR. For instance, there are no visual simulations found within the Aesthetics Section to fully analyze the potential impacts of the project. Noise and Air Quality/Climate Change are reviewed qualitatively, but no data is presented or analyzed to support the conclusions regarding these subject areas.
6. The DEIR does not contain any analysis of potential Indirect Impacts, by subject area, that may be caused by the proposed project.

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7. The DEIR does not contain an analysis of potential impacts caused by odor. This is particularly important due to the planned storage of manure and the temporary presence of construction equipment.

5-7

AESTHETICS

8. The project should offer more screening at SR-79, for the Paso Picacho Day Use area. The DEIR states that this part of the Park is already visible from SR-79, and views are already "degraded," in the existing condition. Since SR-79 is a first priority scenic route identified in the County of San Diego General Plan, the proposed improvements to the Paso Picacho Day Use area should be screened by berms and vegetation, which is similar to that proposed for Descanso Area Development.

5-8

AIR QUALITY

9. The analysis of construction emissions in the DEIR seems incomplete. The DEIR deems fugitive dust emissions during construction activities as a potentially significant impact that could contribute to existing nonattainment conditions in San Diego County. However, the DEIR dismisses exhaust emissions associated with construction equipment used onsite because the equipment used would be "maintained." The DEIR does not elaborate how the maintenance of construction equipment would avoid a significant impact. Operation of construction equipment onsite would lead to mass emissions of ozone precursors that could lead to a violation of federal and/or State air quality standards or cumulatively, cause a considerable net increase for ozone, for which San Diego County is designated as a federal non-attainment area.

5-9

10. The air quality analysis makes a significance determination about short-term construction emissions associated with the project. The analysis does not address operational emissions associated with the increase in traffic, as demonstrated by the Traffic Impact Study prepared for the project; and increase in onsite operations. There is a brief mention of traffic related emissions in the Cumulative Impacts section; however, these emissions constitute a direct impact and need to be discussed in more detail in the air quality section.

5-10

11. The analysis does not address the impacts of the project's emissions on surrounding sensitive receptors. One of the criteria for analyzing air quality impacts is the State CEQA Guidelines question: "Would the project expose sensitive receptors to substantial pollutant concentrations?" Even short-term construction emissions could expose sensitive receptors to fugitive dust and exhaust emissions.

5-11

12. The environmental checklist in Appendix G of the State CEQA Guidelines includes the following: "Would the project create objectionable odors affecting a substantial number of people?" The project has the potential to create

5-12

objectionable odors associated with the equestrian facilities. The DEIR should be revised to include an analysis of this impact.

13. CEQA mandates that a DEIR identify and analyze all significant environmental effects of a project. The California Governor's Office of Planning and Research (OPR) published a technical advisory, entitled *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review* in June 2008. In this technical advisory, OPR recommends that the lead agencies under CEQA make a good-faith effort, based on available information, to estimate the quantity of greenhouse (GHG) emissions that would be generated by a proposed project, including the emissions associated with vehicular traffic, energy consumption, water usage, and construction activities, to determine whether the impacts have the potential to result in a project or cumulative impact and to mitigate the impacts where feasible mitigation is available. The DEIR does not use available information to describe, calculate, or estimate the amount of GHG emissions resulting from the project as required by CEQA.

5-13

14. The DEIR's assertion that "...a project would affect climate change if it altered the earth's radiative ability through direct emissions of GHG..." is misleading. Emissions of GHGs have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. Therefore, GHG emissions require consideration under CEQA and the DEIR needs to be revised to determine the project's contribution to this cumulative impact.

5-14

15. The DEIR cites that California has no statewide significance criteria for addressing climate change. By adoption of Assembly Bill 32 and Senate Bill 97, the State of California has identified GHG emission reduction goals and that the effect of GHG emissions as they relate to global climate change is inherently an adverse environmental impact. Various air districts and local agencies (South Coast Air Quality Management District, Bay Area Air Quality Management District, County of San Diego, etc.) are in the process of identifying significance thresholds for GHG emissions. In addition, OPR has provided amendments to the State CEQA Guidelines, including Appendix G, to address impacts of GHG emissions, as directed by SB 97 (2007).

5-15

The project's GHG emissions should be quantified and analyzed in context of the above guidance. If it is identified that the project's incremental contribution to climate change would be significant, the DEIR should identify mitigation measures to minimize the impact. The California Attorney General's Office website is a source for a list of climate change mitigation measures (http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf.) Additional mitigation measures can be found in the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* white paper (<http://www.capcoa.org/CEQA/CAPCOA%20White%20Paper.pdf>).

16. The air quality section of the DEIR states that "...California has no statewide significance criteria; therefore, at this time DPR is unable to provide analysis and a determination as to the significance of climate change in relation to this project and the overall environment or the feasibility of 'fair share' mitigation..." However, in the cumulative impacts section the DEIR makes a determination that the incremental contribution of the project to climate change less than significant due to the absence of a statewide threshold. The DEIR should make a consistent determination about the contribution of the project to climate change by including an analysis consistent with OPR's guidance as described above.

5-16

GROUNDWATER RESOURCES

17. Page 38, Utilities: The DEIR states that water for the Descanso Area Development will come from wells and the Descanso Community Services District (DCSD). Please provide additional clarification to this description. Does this mean that the water will be produced from on-site wells and from water imported to the site from the DCSD? If so, how much will be provided from on-site supplies versus the DCSD?
18. Additionally, the DCSD groundwater use is regulated by the California Department of Public Health (CDPH). The CDPH has Waterworks Standards that apply to State-regulated water systems. The document should be revised to include a letter from DCSD indicating whether they have water available to serve the project as well as any groundwater analysis as required by the State Waterworks standards. To inquire about potential regulations that would apply in obtaining groundwater from a State-regulated facility, please contact Sean Sterchi, San Diego District Engineer of CDPH (phone: 619-525-4159 or e-mail: Sean.Sterchi@cdph.ca.gov).
19. Page 98, Section 5.1.7 Hydrology/Water Quality: This section does not address the following question listed in the CEQA Guidelines, Appendix G, VIII. Hydrology and Water Quality:

5-17

5-18

b) Would the proposed project 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 of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

5-19

Please revise to include this question in regard to the proposed water use associated with the Descanso Area Development site. A description of the amount of water anticipated to be used and what well or wells the water will come from should be included in the project description. An analysis of potential impacts to groundwater resources as a result of groundwater pumping for this project should be included.

20. Page 111, Section 6.4.6 Cumulative Impacts, Hydrology / Water Quality: This paragraph indicates impacts to water levels at the Descanso Development site will be less than significant based on following water quality regulations. A finding of less than significant for drawdown of water levels is not based on water quality regulations. Rather, it is based on hydrogeological analysis, which has not been conducted. Please revise the DEIR with details on the amount of groundwater proposed, and a hydrogeological analysis to evaluate impacts to groundwater resources from project pumping.

5-20

BIOLOGICAL RESOURCES

21. Appendix C, Section 2.5, page 8, second to last paragraph – Please clearly explain the “developed” component of the coastal oak woodland habitat.
22. Appendix C, Natural Resource Report, Figures 4 and 5 - The scale is broad, and has rendered the biological information illegible. The map scale should be reduced or the information should be divided by the proposed campgrounds with a clear boundary of each campground (survey limits) for each impact footprint, over the biological resources base map.
23. Appendix C – Table 3 provides a list of sensitive plant species known to occur in the vicinity of the campsites; however, it does not disclose the potential impact to each sensitive plant species that may occur as a result of this project. Please provide the potential impact as a result of this project in Table 3 (as it was disclosed in Table 5 for wildlife).
24. Draft EIR, Section 1.2 - Project Location. To better locate the proposed campgrounds; please provide APN numbers in order to reference each site more expeditiously.
25. Draft EIR, Section 5.1.3, page 89, “Impact Bio-1,” first sentence states that there will be permanent (direct) habitat loss, but the Discussion and Mitigation sections focuses on indirect impacts and does not offer mitigation for direct habitat loss. Please provide mitigation for direct impacts under “Mitigation Bio-1” or clarify that this impact identified in Bio-1 is mitigated under Bio-3 (for the identified 7.7 acres of annual grassland direct temporary impacts).
26. Draft EIR, Section 5.1.3, page 90, “Impact Bio-2,” first sentence should reference Section 4.3.5 instead of Section 4.2.4 for impacts to special status *wildlife* species.
27. Draft EIR, Section 5.1.3, page 92, first paragraph, last sentence states that large log barriers will “be placed along the southern and western edge of the Descanso Area Development to direct arroyo toads around the new campground.” Since arroyo toads burrow, an exclusionary fence that consists of woven nylon netting approximately 3 feet in height and 3-6 inches deep should

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be installed along the outer perimeter of the logs in order to prevent arroyo toads from burrowing.

28. Draft EIR, Section 5.1.3, page 92, second paragraph, first sentence states that a qualified biologist will remove and relocate any trapped special-status species to avoid incidental take. The mitigation measure should also state that if arroyo toads are found within the project area that all construction would stop until the appropriate take authorizations are received. | 5-28
29. Draft EIR, Section 5.1.3, page 92. Please clearly identify the mitigation for the identified 0.5-acre impacts to "developed coast oak woodland" and the 7.7 acres of annual grassland direct temporary impacts. | 5-29
30. Draft EIR, Section 5.1.3, page 93, second paragraph, last sentence states that the mitigation for non-native grassland restoration will be acquired during Phase II of the Descanso Area Development. All mitigation for impacts proposed during Phase I, should appropriately take place prior to or concurrently with the impact. | 5-30

CULTURAL RESOURCES

The Cultural Resources Technical Report, Appendix F, was not provided. However the historic analysis report was provided for review as Attachment G of the DEIR and titled: "*Historic Land Use Study Analysis Report*," by Alexander D. Bevil, historian with California State Parks, dated January 28, 2010. In addition, the County has reviewed the cultural resources portions of the DEIR titled, "*Equestrian Facilities Project, Cuyamaca Rancho State Park Draft Program Environmental Impact Report*" dated February 2010. The report provides an overview of the potential impacts to cultural resources, both archaeological and historic, that were identified at each of three locations: (1) Green Valley Family Campground Loop A, (2) Paso Picacho Area and (3) Descanso Development Area. Significant resources have been identified in the Green Valley Campground and in the Descanso Development areas.

31. The County recommends that one or more figures (or maps) be added to Section 4.4.1 that shows the location of historic resources discussed in the text. The same figures, along with photographs, added to the Historic Analysis report would provide a visual interpretation to the text. | 5-31
32. Please expand Section 4.4.2.3 to include a table for each proposed area that summarizes the site numbers, site type, tested/not tested, significance, impact (direct/indirect) and mitigation. The table should also include near-by sites that could be indirectly impacted by the proposed facilities. | 5-32
33. The County recommends that the Archaeological report (Appendix F) be made available to the public. The figures showing site locations and DPR forms can be removed into a Confidential Appendix to the cultural report that would not be available to the public. If the report is not made public for reference, Section 4.4.2.3 should be significantly expanded to discuss such things as record search | 5-33

- results, methods of survey and testing, results of testing including artifacts found. No mention is made in this section of whether or not Native American monitors were on site during the survey and/or testing of sites in the Green Valley Campground or the Paso Picacho area. | 5-33
(cont.)
34. The Historic report (and the Historic section of the DEIR 4.4.1.1) mentions the Indian Village of *Mitaragui* on the south side of Green Valley. This village was not discussed in the archaeological section. If it is near the proposed project area, it should be mentioned in the Ethnographic History section. | 5-34
35. Section 4.4.2.3, the Descanso Area Development should be expanded to include artifact data and interpretation. An analysis should be provided as to the current interpretation of CA-SDI-8855 - Is it still thought that it represents a village site? | 5-35
36. The addition of a table in Section 5.1.4 (current pages 93-95) under Cultural Resources/Historic that summarizes the historic resources by area, the project impacts, direct and/or indirect, and proposed mitigation would enhance and support the discussion. | 5-36
37. Section 5.1.4, Impacts Hist-1: The introduction of non-historic landscape and hardscape would likely have at a minimum an indirect impact on the historic structure and possibly the historic archaeological site. There does not appear to be any discussion of landscape in the Historic Analysis Report and no discussion in the report, or in this section regarding possible impacts from the proposed landscaping. | 5-37
38. Section 5.1.4 Impacts Hist-2: A discussion for potential indirect impacts is recommended to be added regarding the historic Hawley/Oliver Ranch House and the historic archaeological site in the location of the Oliver Ranch House and Outbuildings. At a minimum, it appears that these sites will be indirectly impacted and may be directly impacted by the landscaping. | 5-38
39. Section 5.1.4 Impacts Hist-2 and Mitigation Hist-2: The statement is made: "The concern is whether or not the proposed project will have an adverse effect on the Hawley/Oliver Ranch House in regards to its location, setting, material, and other aspects of its historic integrity." The purpose of the DEIR and associated historic analysis report should be able to answer this question. If not, further research is needed. Clearly, the proposed mitigation for monitoring is not likely to address whether or not the integrity of the sites will be compromised. | 5-39
40. Section 5.1.4 Findings: The findings state that the proposed project would not "adversely affect" any historic or potentially historic resources. The County recommends that this statement be revised to "not directly impact" any historic resource..., and add a short discussion about indirect impacts such as non-historic landscaping. | 5-40

41. Section 5.1.5 Impacts Arch-1 Mitigation: The installation of temporary fencing around the know portion of the archaeology sites could be another layer of protection. | 5-41
42. Section 5.1.5 Findings (page 97): This section should summarize how the mitigation will protect the significant archaeological resources and bring the impacts both direct and indirect to a level below significance. | 5-42
43. Section 6.4.4 Cumulative Impacts: It is recommended that this section be expanded. According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore the issue that must be explored in a cumulative analysis is the cumulative loss of that information. The cultural resources cumulative study area should be identified based on potential future research questions that could be developed within the context of subsistence and settlement models for the Project area as well as a detailed record search that identifies resources within the Cuyamaca Rancho State Park. Study areas could include major east-west drainages were the travel corridors utilized by prehistoric occupants in their seasonal rounds. The confluences of drainages are often major habitation site locations, with associated temporary camps and resource procurement stations established on surrounding tributaries and on adjacent uplands. | 5-43

HAZARDS AND HAZARDOUS MATERIALS (VECTORS)

44. The County recommends that a Vector Management Plan and a Manure Management plan be drafted and implemented to control odors, rodents and flies at this facility. The plan should be reviewed by the County of San Diego Vector Control Program or the California Department of Public Health Vector-Borne Disease Section at www.cdph.ca.gov. | 5-44

NOISE

45. The noise section of the DEIR, Section 4.10 does not reference the County of San Diego General Plan Noise Element and County Noise Ordinance. Other requirements are referenced that are not consistent with County of San Diego noise standards. Further, the impacts and mitigation section 5.1.8 does not include the noise details and quantifiable data (rational) to support the identified noise impacts and associated mitigation measures. In addition, it appears that a noise report was not conducted in association with this DEIR. Without an analysis, this section of the DEIR would not be considered adequate at this time. | 5-45
46. Noise impacts and mitigation measures have been identified within the DEIR. Additional noise information and analysis is required to verify the specified noise impacts and associated noise mitigation measures recommended within the DEIR would be adequate. | 5-46

47. The project proposes a campground type of use that may be considered a noise sensitive land use. These uses are in close proximity to an existing roadway (SR-79). The noise report and DEIR should determine whether these areas are exposed to future traffic noise levels exceed County noise requirements. The FHWA Noise Abatement Criteria (NAC) may apply to the project if the proposed campgrounds are determined not to be subject to the County Noise Element. Further discussions with Staff would be necessary to determine which requirement applies.

5-47

48. The project identifies potential construction equipment operations as a noise impact. Please ensure that the noise report and DEIR shows adequate noise analysis identifying these noise impacts and quantifiable data to further support any noise mitigation measures to reduce levels to less than significant. Further justify the noise analysis findings by demonstrating consistency with the County Noise Ordinance.

5-48

49. A noise report is required to determine whether the project demonstrates consistency with County noise standards and appropriate/effective mitigation measures are proposed. Noise report guidelines are available within the following: website: <http://www.sdcounty.ca.gov/dplu/docs/Noise-Guidelines.pdf>.

5-49

HYDROLOGY AND WATER QUALITY

50. The Soil Conservation Service (now called the Natural Resources Conservation Service [NRCS]) hydrologic method (NRCS hydrologic method) requires basic data similar to the RM: drainage area, a "runoff curve number" (CN) describing the proportion of rainfall that runs off, time to peak (Tp), the elapsed time from the beginning of unit effective rainfall to the peak flow for the point of concentration, and total rainfall (P). The NRCS approach, however, is more sophisticated in that it also considers the time distribution of the rainfall, the initial rainfall losses to interception and depression storage, and an infiltration rate that decreases during the course of a storm. Results of the NRCS approach are more detailed, in the form of a runoff hydrograph. Details of the methodology can be found in the NRCS National Engineering Handbook (NEH), Section 4 (NEH-4) (USDA, 1985). The NRCS hydrologic method should be used for study areas approximately 1 square mile and greater in size. The NRCS hydrologic method may be used for the entire study area, or the RM or MRM may be used for approximately 1-square mile of the study area and then transitioned to the NRCS hydrologic method using the procedure described in Section 4.4.

5-50

51. Please elaborate on the statement on Page 8 that "Since it is unlikely that a 100-year event for the Sweetwater River and Descanso Campground site occur at exactly the same time, it is assumed that the tailwater condition for analyzing culverts C-1 through C-3 is at the top of bank, elevation 3,400 feet, of the Sweetwater River.

5-51

52. Discuss if the proposed project would substantially alter the existing drainage pattern of the area or substantially increase the rate or amount of surface runoff in a manner that would cause either substantial erosion or siltation on or off-site. Provide proposed mitigation. **5-52**
53. Please include a summary/conclusion of project drainage impacts on existing drainage facilities and proposed mitigation. **5-53**
54. A Registered Engineer should sign the Declaration of Responsible Charge. **5-54**
55. The DEIR and the CEQA Drainage Study need to provide the necessary information applicable to a CEQA analysis including clearly defined project impacts and mitigation measures. **5-55**
56. Any changes to the scope of the project that would affect the Plot Plan and Preliminary Grading Plan should be reflected in the CEQA Drainage Study and the Storm Water Management Plan (SWMP). **5-56**
57. The Drainage Summary should state that the project "will disturb approximately ? acres; and that the "overall project development proposes to increase impervious area by approximately ? square feet or ?% of the overall ? acre site." Provide a detailed summary with the following information: **5-57**
- The overall area of the project parcels, approximately ? acres
The area that the project will disturb...
The impervious area that the project will create...
58. A Hydromodification discussion is needed in this study. Include a separate narrative with the total area that the project proposes to disturb, and how the project will comply with Hydromodification requirements. **5-58**
59. It is recommended that a table be provided for pre-development versus post-development drainage. A node numbering system shall be utilized for clarity, showing different numbers for all points of concentration (on-site and off-site). Clearly show pre and post off-site discharge rates and velocities. Rates and velocities shall not exceed existing values. The comparisons should be made about the same discharge points for each drainage basin affecting the site and adjacent properties. If a proposed method of discharge is different from existing (i.e. sheet flow to culvert outfall) engineer shall show no adverse impacts to down stream receiving channels will occur. **5-59**
60. Provide data including a narrative on the adequacy of all drainage facilities impacted by proposed development. The report should identify and analyze the adequacy of existing downstream drainage facilities at project outfall locations and evaluate the impact (if any) to facilities and public roads caused by this project. **5-60**

61. Please include land use and soils group maps showing grids in developing "C" values. Show method/calculations of "C" values used for developed conditions. | 5-61
62. Please include calculations for the 100-year floodplain information. 5-62
63. NOTE: A recorded Waiver and Release Agreement shall be obtained from each property owner who is impacted by significant changes (including diversion and concentration) in downstream flow characteristics resulting from grading, private roads or other improvements, to the satisfaction of the Director of Public Works. | 5-63
64. Existing and Proposed Conditions Drainage Map:
- Include a connection to County of San Diego Roads and any other access road as an area to be disturbed, including all private roads that will be used/improved to access the project site.
 - Show locations of all existing and proposed drainage structures clearly, including road crossings.
65. Please include copies of the Soils Group Map. 5-65
66. Please include copies of the 100-year 6 and 24-hour precipitation isopluvial maps with site location and latitude / longitude shown. | 5-66
67. It would be useful to show 100-year flood lines of inundation on map for channels with drainage basins greater than 25 acres. | 5-67
68. Please include a listing of all FEMA Map panels within the project area that currently are not printed. | 5-68
69. The County of San Diego Standard Urban Stormwater Mitigation Plan for Land Development and Public Improvement Projects (SUSMP) is intended to help implement one part of the County's Stormwater Program. The SUSMP only addresses land development and capital improvement projects. It is focused on project design requirements and related post-construction requirements, not on the construction process itself. | 5-69
70. The County's regulatory programs for stormwater are established in County ordinances, principally the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO), at County Code sections 67.801 *et seq.* The WPO defines the requirements that are legally enforceable by the County in the unincorporated parts of San Diego County. | 5-70
71. Please expand the description of the proposed Treatment BMPs in report and include type, quantity, and location. | 5-71

72. Please add a conclusion section. State whether the combination of proposed construction and permanent BMPs will reduce this project's potential pollutants to the maximum extent practicable. | 5-72
73. Please provide applicable 85th percentile (first flush) capacity calculations for proposed Treatment BMPs in Appendix F. | 5-73
74. Please list the annual maintenance cost for the Treatment BMPs chosen in a separate Appendix and list the Fiscal Resources in a separate Appendix. | 5-74
75. The exhibit needs to show the location of all proposed Treatment BMPs. Provide additional sheets if necessary. Include locations for bioretention facilities, high-flow biofilters, and settling basins. | 5-75
76. In January 2007, the San Diego Regional Water Quality Control Board reissued a municipal Stormwater NPDES permits to the San Diego Area municipal Co-permittees. The reissued permit updates and expands stormwater requirements for new developments and redevelopments, including requirements for LID, BMPs, and HMP. Web link to this Order: http://www.projectcleanwater.org/pdf/permit_r9-2007-0001.pdf. This NPDES permit applies to all Co-permittee dischargers (i.e. the County for unincorporated areas and the municipalities for incorporated areas), who own or operate a municipal separate storm sewer system (MS4), that discharges urban runoff into waters of the United States, within the San Diego Region. | 5-76

TRAFFIC AND TRANSPORTATION

The DEIR and Traffic Impact Study (TIS) have adequately addressed the majority of the County's traffic comments on the NOP, in the July 11, 2007 letter. The proposed project's "worst case scenario" daily traffic generation has been estimated to be only 130 daily passenger vehicle equivalent trips. Based on the DEIR and TIS, the following traffic comments should still be addressed:

77. The TIS should identify/assess the project's access driveways onto the County and Caltrans roadway systems. The TIS should verify that adequate corner sight distance will be provided at the project's access driveways/intersections. | 5-77
78. Based on the project description, large truck and trailer rigs will utilize the project sites/facilities regularly. The DEIR/TIS should assess the ability of the project's two-lane access roads to adequately accommodate traffic from large trucks and trailer rigs. | 5-78

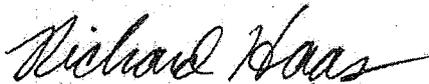
79. The TIS should include a brief summary of the County's General Plan Update Mobility Element Road Network recommendations for affected roadways within the unincorporated area and evaluate consistency with the road network plans. | 5-79
80. The DEIR and TIS should note that the County would require construction and encroachment permits for any work performed within the County Road Rights-of-Way. Also, Caltrans requires encroachment permits for work within State Road Rights-of-way. | 5-80

DEPARTMENT OF PARKS AND RECREATION

81. The DEIR incorrectly identifies the park area adjacent to the Descanso Elementary School, as a County Park. While the County has provided funding for improvements to this park facility, the property is owned and operated by the Mountain Empire Unified School District. The DEIR should be revised to remove all references to this property as a County Park or County Park land. | 5-81

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 Dennis Campbell (858) 505-6380 or via email at dennis.campbell@sdcounty.ca.gov.

Sincerely,



RICHARD HAAS, Assistant Director
Department of Planning and Land Use

cc: Megan Jones, CAO Staff Officer, DCAO (via email)
Kenneth Brazell, Project Manager, DPW, (via email)
Bob Goralka, Department of Public Works, Transportation Division, (via email)
Descanso Community Planning Group
Priscilla Jaszowski, Administrative Secretary, DPLU, (via email)
Dennis Campbell, Land Use/Environmental Planner, DPLU, (via email)
LeAnn Carmichael, Land Use/Env. Planning Manager, DPLU (via email)

Letter 5

County of San Diego, Department of Planning and Land Use

Comment No.

Response

- 5-1 After further consideration and due to current site conditions and constraints, DPR has adopted the Environmentally Superior Alternative for the Descanso Area Development Phase II project.
- As stated in the DEIR (p. 42), the Mack Ranch property is not a suitable location for an equestrian campground due to the presence of sensitive cultural and biological resources and the significant cost necessary to address design challenges to provide feasible and safe access to the site.
- As stated in the DEIR (p. 7) numerous sites (a total of 17) were considered for an equestrian campground; but most of these sites were determined unsuitable due to the presence of sensitive cultural and/or biological resources, access issues, infrastructure and land use issues. Of the 17 sites, 4 were considered potentially suitable for an equestrian campground; however use of any of those sites would have required a General Plan update/revision.
- 5-2 An Alternatives Matrix has been added for each of the four projects proposed in the DEIR. Table 2.2 has been added to better identify mitigation measures versus Project Requirements. Please also see Section 6.0 of the Natural Resources Report.
- 5-3 A No Project Alternative has been added to Section 2.5.
- 5-4 CEQA Guidelines Section 15126.6 summarizes how alternatives to the proposed project should be presented in an EIR. The Environmentally Superior Alternative cannot be the “No Project” alternative; however, it can be the Preferred Alternative. No revision is necessary.
- 5-5 CEQA Guidelines Section 15126.6 (d) states, “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison.” See Response 5-2.
- 5-6 Please see Section 5 in the DEIR.
- 5-7 Section 4.2.6 Odor has been added to the Air Quality discussion in the EIR.
- 5-8 As stated in the DEIR (p. 87), no trees will be removed from the area between the proposed Paso Picacho Day Use area and SR-79. Therefore, the day use area would be partially screened from passing motorists. However, DPR will consider planting some of the required replacement oak trees between the highway and the day use site in order to better screen the site from highway travelers. Due to

the presence of mature trees in this area, berms would not be a suitable option for screening purposes.

- 5-9 Section 4.2 Air Quality has been updated. URBEMIS Version 9.2.4 was used to analyze potential air quality impacts associated with construction and operation of the four projects' Preferred Alternatives (including the 25 acre campground at the Descanso Area Development). Based on the results, no significant impacts to air quality would occur as a result of the Equestrian Facilities Project.
- 5-10 Please see Response 5-9.
- 5-11 Although the project could temporarily expose sensitive receptors to emissions during construction and operation of the proposed equestrian facilities, based on the County's significance thresholds, substantial pollutant concentrations would not be generated. Project construction is expected to last a maximum of 10-12 days. Please see Response 5-9.
- 5-12 Please see Response 5-7.
- 5-13 Section 4.2.5 Greenhouse Gases has been updated to include the County's Interim Draft Guidelines for Determining Significance for Climate Change. According to these draft Guidelines, CEQA documents for projects that would generate 900 metric tons or more of greenhouse gas (GHG) emissions, must contain a Climate Change Analysis and demonstrate that the project would not conflict with the goals and strategies established in AB 32. According to the California Air Pollution Control Officers Association (County 2008a), 900 metric tons of GHG emissions are generally produced by a 50 unit subdivision, a 35,000-square foot commercial or office center, or 11,000 square feet of retail. Based on the URBEMIS output, approximately 1.4 metric tons of GHG would be produced during construction and 0.03 metric tons per day during operation of the Equestrian Facilities Project. This is substantially below the County's threshold of 900 metric tons.
- 5-14 Comment noted. See Response 5-9.
- 5-15 Comment noted. See Response 5-9.
- 5-16 This sentence was removed from the Air Quality section. The project would have a less than significant effect on air quality and cumulatively, impacts to air quality would be less than significant.
- 5-17 Water for the Descanso Area Development would be provided by on-site wells and if necessary, imported from the Descanso Community Services District. At this time, DPR does not know how much water would be required for the campground as a final design has not been completed. Final design will not include a conventional septic system and the campground will contain only 5 campsites;

- therefore demand for groundwater will be less than under the proposed Preferred Alternative.
- 5-18 Please see Response 5-17.
- 5-19 Please see Response 5-17.
- 5-20 Please see Response 5-17.
- 5-21 The existing Green Valley Campground Loop A is within the oak woodland habitat, therefore DPR considered the oak woodland habitat “developed.” To avoid any confusion, this word was removed from the EIR.
- 5-22 Comment noted.
- 5-23 As stated in Section 3.2.1 of the Natural Resources Report (Appendix C, p.10) no special-status plant species were detected or rare natural communities identified during any surveys or site visits at any of the project sites. Thus, no impacts are expected to occur.
- 5-24 Comment noted.
- 5-25 Table 7 in the Natural Resources Report (Appendix C, p. 98) discusses temporary and permanent impacts to vegetation. DPR will mitigate the loss of nonnative grassland at a 0.5:1 replacement-to-impact ratio and will use the replacement ratios for oaks recommended by CDFG. Please see Response 2-5.
- 5-26 This change has been made.
- 5-27 As stated in the Natural Resources Report (Appendix C, p. 4), on-site consultation with the USFWS was conducted on November 19, 2009. Proposed conservation measures follow the arroyo southwestern toad (*Bufo microscaphus californicus*) recovery plan (USFWS 1999) and were approved by USFWS.
- 5-28 All work will comply with the Endangered Species Act and its provisions.
- 5-29 Please see Responses 5-25 and 2-5.
- 5-30 Comment noted. Mitigation for impacts to nonnative grassland will take place prior to or concurrent with the proposed impact.
- 5-31 Additional research and evaluation of the Oliver/Merigan Ranch Complex (Complex) has revealed that there are only two structures and two landscape improvements remaining from the ranch’s 1929 to 1960 period of potential historic significance: a 1929-built stone cabin, a 1941-built redwood board-n-batten storage shed, a line of elm trees along the southeastern graded dirt entry lane, and segments of a graded dirt service road. While there were at least nine more structures at the time of DPR’s 1977 acquisition, all trace of their existence, including stone and concrete foundation walls and pads, were removed. In addition to the cabins and structures, a white-

washed wood grapestake perimeter fence was removed. The project historian contends that without these character-defining contributing landscape elements, the property no longer represents an intact thematic historic ranching district; however, the area may still qualify as a California Register-eligible historic site property.

Updated recordation forms for the stone cabin and the potentially historic site have been added to Appendix G: Historical Land Use Study and Analysis Report. The 1975 Merigan Ranch Plat Plan, which shows the location of the existing and demolished historic ranch buildings and structures, has also been added to the Report.

Except for aerial photographs from 1928 to 1964, DPR does not possess any historic photographs of the Complex site. However, recent communications with the Merigan family may eventually lead DPR to acquire photographic documentation of the existing and demolished structures and landscape features. The updated Recordation forms will include current photographs of the site, the existing stone cabin, and the rear wooden board-n-batten storage shed.

- 5-32 This information is available in Confidential Appendix F (see 5-33 below).
- 5-33 Confidential Appendix F contains information protected under the California Government Code §6254 & 6254.10. It is available upon request by a qualified archaeologist. Section 4.4.2.3 will be expanded to include additional information as appropriate to document archaeological work undertaken for this project.
- 5-34 It has been postulated that site CA-SDI-11198 represents the village of Mitaragui. This site is located more than 2.3 miles from the Loop A project site.
- 5-35 This information is available in Confidential Appendix F. A summary statement will be included in Section 4.4.2.3.
- 5-36 Comment noted. Changes were made to Appendix G and the EIR regarding the project's direct and/or indirect impacts to potential historic buildings, structures, and landscape features. DPR believes these changes sufficiently discuss and summarize the resources' potential historic eligibility and the project's direct and/or indirect impacts and the proposed mitigation and treatment measures.
- 5-37 Appendix G and the EIR have been revised regarding the project's impact on potential historic landscape features. New archival evidence discussed in Response 5-31 refutes the previous claim that there are any surviving historic archaeological features within the surrounding Complex site.
- 5-38 Appendix G and the EIR have been revised regarding the project's direct and/or indirect impacts on potential historic buildings,

structures, and landscape features. New archival evidence discussed in Response 5-31 suggests that the *Hawley/Oliver Ranch House* should be referred to as either the “*Allen T. Hawley Ranch House*” or the “*Oliver/Merigan Ranch Foreman’s Cabin*”. This evidence also refutes the previous claim that there may be surviving below-ground historic archaeological features within the surrounding Complex site. Therefore, the proposed project would have a less than significant impact on potential historic resources.

- 5-39 The project area is far enough removed from the *Oliver/Merigan Ranch Foreman’s Cabin* that the proposed project would not have a significant impact on its historic integrity in regards to its location, setting, materials, design, feeling, or association with its historic use. Nor would the project have a significant impact on the cabin as a contributing element to a potential Descanso area discontinuous historic thematic vernacular stone cabin architectural district. Historic evidence refutes the previous claim that there are any surviving below-grade historic features within the Complex site. Therefore, the proposed project would have a less than significant impact to non-existent historic features. A qualified cultural resource monitor would be present during all subsurface work to verify the existence of any below-grade features dating from the Complex’s 1929 to 1960 period of historic significance.
- 5-40 The requested change to “not directly impact” has been made in the EIR. Based on Response 5-39, the proposed project will not directly impact any known potentially eligible historic resources. A discussion of the proposed project’s introduction of non-historic landscaping has been added to Appendix G and the EIR.
- 5-41 Agreed. Such protection treatments will be added to the project specifications.
- 5-42 Mitigation measures to protect significant archeological resources are stated in the DEIR (p. 97). A summary of these measures is unnecessary.
- 5-43 As stated in the DEIR (pp. 95-96), the project has been designed to avoid impacts to archaeological sites and cultural resources; however there is the slight potential for unknown buried deposits that are addressed by the treatment and mitigation measures. It is the determination of the DPR’s cultural resource specialists that there is no potential for significant cumulative impacts to cultural or historical resources through the implementation of this project.
- 5-44 According to Wheeler and Zajackowski (2002), fly eggs hatch in seven days. For the proposed project, horse manure will be stored at least 400 feet from sensitive receptors and for no more than 48 hours during peak visitor use and no more than 72 hours during non-peak times. Therefore, flies are not expected to become a nuisance at any

of the project sites. Also, as stated in the odor analysis, all storage bins are located down-wind from sensitive receptors. DPR believes that nuisances from horse manure will be minimal; therefore neither a Vector Management Plan nor a Manure Management Plan is required.

- 5-45 Section 4.10 has been revised to include a more thorough discussion of applicable noise standards. Comment 5-45 implies that DPR is subject to County Ordinances and the General Plan, however this is not accurate. This comment also does not clarify what “other requirements” are not consistent with the County’s noise standards. The only standards given in Section 4.10 were taken from the County Land Use / Noise Compatibility Standards (p. 86). Baseline noise data gathered at Paso Picacho and Descanso Area Development sites were given in the DEIR (p. 86). These measurements were recorded by a consultant as part of a Noise Study. This study was not provided as an appendix because the contract was terminated when funding for the campground portion of the project was removed. The data is still valid however, and represents baseline noise levels at the Paso Picacho and Descanso Area Development sites.
- 5-46 Section 5.1.8 has been revised. Noise impacts associated with operation of the equestrian facilities are less than significant with mitigation.
- 5-47 Baseline measurements taken along Viejas Boulevard as given in the DEIR (p.86) indicate that baseline noise levels are within the County’s acceptable limit of up to 62 dBA for open space areas. The installation of berms and landscaping would not only screen the campground from the neighboring properties, it is also expected to muffle noise from the surrounding land uses including traffic on Viejas Boulevard.
- 5-48 Impacts Noise-1 has been revised in the EIR to include construction equipment noise emissions in dBA.
- 5-49 Comment noted.
- 5-50 As discussed in the DEIR (Appendix D; Table 3 and Table 4), the three watersheds in the study area are less than 1 square mile (the largest watershed is approximately 0.3 square mile). In addition, since the objective of the analysis is to estimate the peak design flow, Rational Method as defined in the San Diego Hydrology Manual is an acceptable method for the hydrology analysis.
- 5-51 The analysis estimated the culvert capacity during a 100-year storm event. For this analysis, the downstream boundary tail water condition is set at the top of the bank instead of the Sweetwater River 100-year water level. This is because the coincident probability of having a 100-year flood event at the Descanso Area

Development campground and at the Sweetwater River at the same time is likely lower than 1 percent for a given year. Furthermore, during a 100-year flood along the Sweetwater River, the culverts will be flooded so the sizing of the culvert would not affect the flood protection capacity. Therefore, for the purpose of culvert sizing, the downstream boundary tail water condition is set at the top of the bank instead of the Sweetwater River 100-year water level.

- 5-52 A discussion on the existing and proposed hydrology is provided in the DEIR (Appendix D).
- The existing 100-year flow was found to be a combined 332 cfs for the Descanso Area Development site. The proposed flow condition was calculated to be 338 cfs.
- At the Paso Picacho site, the existing flow was calculated to be 97 cfs and the proposed flow condition was calculated to be 94 cfs.
- The DEIR (Appendix D) discusses the use of a detention pond and vegetated swales to mitigate the surface runoff.
- 5-53 This is discussed in the DEIR (Appendix D).
- 5-54 This was provided in the DEIR (Appendix D).
- 5-55 Mitigation measures such as BMPs are described in the DEIR (Appendix D).
- 5-56-5-57 Comment noted.
- 5-58 Any needed hydromodification analysis beyond what has been provided in Appendix D will be included in the encroachment permit application.
- 5-59 This table was provided in the DEIR (Appendix D; p.13). The existing sum flow for both the Western Culvert and the Eastern Culvert is 332 cfs. The proposed design calculated the sum flow for both the Western Culvert and Eastern Culvert to be 338 cfs. Both the Western and Easter Culverts join into the same drainage channel just immediately south of Viejas Boulevard.
- 5-60 As discussed in the DEIR (Appendix D; p. 14) the existing drainage underneath Viejas Boulevard is insufficient to convey a 100-year storm. The existing drainage culverts at Viejas Boulevard are inadequate and causing flooding.
- The proposed design includes upgrades to the eastern culverts to accommodate the 100-year storm to prevent overtopping of Viejas Boulevard. The western culvert is outside DPR property and is not proposed to be upgraded. However, the design flow through this culvert decreases as a result of the project.

- 5-61 Both the Descanso Area Development and Paso Picacho sites will be constructed with porous surfaces such as DG for all roads and parking spaces. Therefore a “C” value of 0.35 was assumed.
- 5-62 The 100-year floodplain information was obtained online from the FEMA website:
<http://www.msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1>.
- 5-63 Please see Response 5-59. Downstream flow characteristics will not change as a result of the project.
- 5-64 The DEIR (Appendix D) discusses the existing and proposed drainage and includes figures.
- 5-65 The geotechnical report has been added to the FEIR.
- 5-66 These isopluvial values were obtained from the maps provided in the County of San Diego Hydrology Manual.
- 5-67 Comment noted.
- 5-68 The following FEMA Map panels are within the project area: panel 1462 and 1726 of 2375.
- 5-69 The construction process is now addressed with a SWPPP and a General Construction Permit from RWQCB effective July 1, 2010.
- 5-70 Comment noted.
- 5-71 The hydrology report is a preliminary report for sizing. The final design will include the final BMP size, locations, etc.
- 5-72 The combination of proposed construction and permanent BMPs will reduce this project’s potential pollutants to the maximum extent practicable.
- 5-73 This will be calculated during the design process.
- 5-74 Maintenance of the BMPs will be performed by DPR personnel as part of their normal maintenance duties.
- 5-75 Proposed BMPs such as detention basins and vegetated swales are shown in the DEIR (Appendix D; Figures 4 and 5).
- 5-76 Comment noted.
- 5-77 These were calculated and a sight distance report can be provided during the encroachment application process.
- 5-78 Comment noted. DPR is not aware of any restriction to truck or trailer operation that would be affected on the sites.
- 5-79 Comment noted.
- 5-80 Any necessary encroachment permit will be obtained.
- 5-81 The correction has been made in the text.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

11 March 2010

To: Ms. Christine Beck, Environmental Coordinator
 California Department of Parks and Recreation
 Southern Service Center
 8885 Rio San Diego Drive, Suite 270
 San Diego, California 92108

Subject: Draft Environmental Impact Report
 Equestrian Facilities Project at Cuyamaca Rancho State Park

Dear Ms. Beck:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix G, we have the following comments:

1. While we were not able to review the archaeological report for the project, Appendix F, the mitigation measures for archaeological resources appear reasonable and appropriate. | 6-1
2. Regarding historical resources, we agree with the impact analysis and with the mitigation measures as proposed. | 6-2
3. We support the use of the Merigan Ranch House as a Park employee residence. While this would be a positive action to protect the sensitive cultural resources in the Descanso Area Development, it would also help ensure the day use facility there remains a good neighbor to the community of Descanso. We believe the use as an employee residence should be confirmed as a part of the project and included as a mitigation measure. | 6-3

We recognize the challenges replacing the original equestrian facilities has presented to State Parks and appreciate the efforts made to develop the solutions included in this DEIR. Thank you for including SDCAS in its public review.

Sincerely,

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

cc: SDCAS President
File

Letter 6: San Diego County of Archaeological Society, Inc.

<u>Comment No.</u>	<u>Response</u>
6-1	The reviewer concurs with archeological mitigation measures provided in the DEIR.
6-2	The reviewer concurs with historical mitigation measures provided in the DEIR.
6-3	The Oliver/Merigan Ranch Foreman's Cabin will be used as a Park employee residence as mitigation for the Descanso Area Development.

COURTNEY ANN COYLE
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Christine Beck, Environmental Coordinator

DPR - Southern Service Center

8885 Rio San Diego Drive, Suite 270

San Diego, CA 92108

Via Confirmed Fax 619.220.5400

April 2, 2010

Re: Equestrian Facilities Project Cuyamaca Rancho State Park

DEIR SCH # 2007051074, February 2010

Dear Ms. Beck:

The comments on the proposed DEIR are submitted on behalf of Carmen Lucas, Kwaaymil Laguna Band of Indians. These comments supplement prior correspondence and communications to DPR from my office and from Ms. Lucas. The proposed project would encompass four components and occur at three locations within the Cuyamaca Rancho State Park. We first will make general, then more specific comments.

I. General Comments

In general, the document appears easy to read and well organized.

We note, however, that several comments and recommendations from our NOP comment letter have not been addressed in the DEIR. We would like to know why the following have not been incorporated into the DEIR: that a qualified professional draft an ethnographic/prehistory report of Descanso and how it ties into the Cuyamaca Region; whether DPR is considering acquiring additional lands on either side of Merrigan Ranch to provide a buffer; and that impacts to streams and cultural resources along the Cold Steam Trail be carefully considered and avoided.

7-1

II. Specific Comments

Historic Land Use Study and Analysis

The Historic Land Use Study and Analysis and related sections of the DEIR should use and make reference to Mary Elizabeth Johnson's *Indian Legends of the Cuyamaca Mountains*. These legends were given to Ms. Johnson by Maria Alto, Kwaaymij Laguna Indian, in and around 1914. These legends could contribute greatly to the historic context for the Descanso, Green Valley and Stonewall areas, in particular. They also reflect the historic views of tribal people before and during this time.

7-2

The reduction of the local Kumeyaay may more accurately be stated, in part, by saying the Indians had been killed instead of simply stating that "other factors" had reduced them. (Study, page 3).

7-3

In referencing the road connections, it may be more accurate to state it went east along Samagatuma Creek to the Yuma Trail, instead of Yuma Road. (Study, page 4 and DEIR, page 64).

7-4

Ms. Lucas encourages DPR or another entity to perform the formal survey and inventory of the historic cabins between Descanso and Guatay, propose a discontinuous thematic district and take steps to preserve these resources. (Study, page 12).

7-5

Cultural Resource Requirements and Mitigation

DPR should consider adding another section to its Cultural Resources Conditions and Mitigation Measures in DEIR Table 2.1, *Project Requirements Incorporated into the Cuyamaca Equestrian Facilities Project*. This new section could be listed as "Cultural Resources/Tribal."

The purpose would be to help ensure that tribal concerns, which are not necessarily the same as historical or archaeological concerns, be clearly incorporated into the project. This would be appropriate under DPR policies and procedures and the Park General Plan and because of the unique history and issues surrounding these facilities in this park unit.

It would include: Qualified Native monitors during all earthmoving activities associated with any of the projects in the DEIR (including digging of root basins and other improvements), clear ability for the Native monitor to stop work in an area in which tribal cultural resources, human remains, grave goods or ceremonial items may have been found, that the Native monitor or consultant assists in the recordation and evaluation of such finds, that such places will be put on the Native American Heritage Commission sacred lands file, that human remains should be identified by qualified personnel, notably the County Medical Examiner (we have particular confidence in Dr. Madeleine Hinkes), that if any soil would be imported - it must be documented fill and not contain human remains or grave goods - and if any soil is to be exported - it must not contain human remains or grave goods, that preconstruction cultural sensitivity training occurs with the active participation of the Native monitor or consultant, that placement of fencing, signs and interpretative materials will include consultation with the Native monitor or consultant, that water screening be required in areas of potential ancestral human remains (such as Merrigan Ranch) to better assess the presence of cremated or fragmented human remains, and that any roads or trails be realigned away from archaeological sites.

7-6

Because this would essentially better organize existing measures into one place and help ensure additional consideration and protection of cultural resources of particular concern to Native peoples, it should not necessitate a recirculation of the environmental document.

Comments on Design

The Paso Picacho Day Use Area Preferred Alternative/Environmentally Superior Alternative states that up to 5 oak trees would be removed. (DEIR, page 22). We ask that DPR reconsider removing the oak trees and continue to try to remove as few oaks as possible.

7-7

The Descanso Area Development (Programmatic) Preferred Alternative states that construction would impact approximately 25 acres of annual grassland. (DEIR, page 36). Every effort should be made to minimize as much as practicable both direct and indirect impacts to native grassland, wherever it is found.

7-8

Subsequent Environmental Review

In general, we believe that should multiple burials, ceremonial or sacred places be encountered, that subsequent environmental review may be warranted. We also agree with the Archaeological Testing Report that additional testing and specialized analyses may be warranted as the project progresses. (Merrigan Ranch Archaeological Testing Program, *Cuyamaca Rancho State Park Equestrian Facilities Program*, 2008, pages 23, 25).

7-9

We agree with the DEIR that trail and bridge construction, as well as construction of Phase II of the Descanso Area Development, would require subsequent environmental review and Native consultation.

7-10

We also agree with the Archaeological Survey Report that should the Mack Property be identified as a future equestrian facility location, that additional archaeological and historic investigations of that property must first occur. (Archaeological Survey Report, *Cuyamaca Rancho State Park Equestrian Facilities Project*, July 2007, page 34).

7-11

Cultural Resource Sections

The DEIR states that "Human occupation of the Cuyamaca Mountains dates back thousands of years. The Kumeyaay peoples being the most recent occupants." (DEIR, page 63). (Compare with, prehistoric context statement at DEIR, page 71; Archaeological Survey Report, *Cuyamaca Rancho State Park Equestrian Facilities Project*, July 2007, page 9; Merrigan Ranch Archaeological Testing Program, *Cuyamaca Rancho State Park Equestrian Facilities Program*, 2008, page 3). We do not understand the second sentence above; local tribes understand that they have been the inhabitants of this area for over 10,000 years and that a cultural continuity from that time to the present exists. Therefore, we request that the second sentence be struck.

7-12

The DEIR states that because some of the Loop A campground's most distinctive landscape features are less than 50 years old, they are not eligible for consideration as contributors to a Park Rustic Thematic Historic District. (DEIR, pages 69, 95). As you may know, the 50-year rule may not apply to properties that are integral parts of districts that are eligible for the National Register. See, National Park Service, National Register Bulletin, *Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years*, 1979, as revised.¹ Ms. Lucas therefore encourages DPR to draft a nomination for this thematic district.

7-13

¹ See, < http://www.nps.gov/history/nr/publications/bulletins/nrb22/nrb22_1.htm>.

The DEIR refers to the project area falling within ethnographic territories. (DEIR, page 71). These should be listed in the conjunctive: the Kumeyaay, Kwaaymii and Kamia, reflecting their related yet distinct aspects.

7-14

The DEIR states that the Ipais and Western Kumeyaay practiced shamanism using Datura initiation customs that "had been learned from the Luisenos and Gabrielinos to the north." (DEIR, page 72). The citation for this statement is unclear.

7-15

The DEIR references that ancestral human remains were uncovered during site testing at the Descanso Area Development. (DEIR, page 73). Is their disposition accurately described in the Archaeological Testing Report? (Merrigan Ranch Archaeological Testing Program, *Cuyamaca Rancho State Park Equestrian Facilities Program*, 2008, page 16 and Table 5). Was this area added to the NAHC Sacred Lands File? Will this area be avoided in its entirety by the project? Will there be a reasonable and sufficient buffer area?

7-16

The DEIR in its archaeological mitigation section states that a "DPR-approved" cultural resource specialist will have certain duties. (EIR, page 95). What are the qualifications for this individual? Will they be trained in the local prehistory and be a qualified archaeologist?

7-17

The DEIR appears to deviate from the provisions of California statute regarding discovery and treatment of human remains and religious, ceremonial or sacred places. (DEIR, page 96). First, by law, the Coroner notifies the NAHC, not tribal representatives, of the positive identification of human remains.² Second, it is not the Native monitor's job to notify appropriate Native American authorities on the discovery; by law, it is the NAHC's duty to do this. Third, a public agency on public land has additional duties regarding burial grounds, religious or ceremonial sites on public land. (See, Public Resources Code section 5097.97). Therefore reference to avoidance only "to the maximum extent practicable" should be struck and the other corrections should be made to the text.

7-18

The Archaeological Survey Report states that there are reports of historic removal of artifacts at Merrigan Ranch. (Merrigan Ranch Archaeological Testing program, *Cuyamaca Rancho State Park Equestrian Facilities Program*, 2008, page 8). Is there a way to find out what happened to those collections or what was in them?

7-19

The Archaeological Survey Report states that 502 artifacts and cultural constituents were recovered during testing, including sherds, charcoal, bone, groundstone, debitage and stone tools. (Merrigan Ranch Archaeological Testing program, *Cuyamaca Rancho State Park Equestrian Facilities Program*, 2008, pages 11-15, 18). Were these items curated? If so, where?

7-20

Miscellaneous Comments

DPR may want to revise its climate change analysis to better reflect recent state guidance on how to address these types of impacts. (DEIR, pages 50, 110). While it is unlikely that such analysis will change the impacts, mitigation or alternatives to any great degree, revisiting this section will provide a more robust analysis against potential challenge to the document.³

7-21

² A best practice is for this notification to include a written document conveying the findings.

³ See, for example, the Governor's Office of Planning & Research website: <http://www.opr.ca.gov/index.php?a=ceqa/index.html>.

We are pleased that the temporary equestrian staging area at Hual-Cu-Cish Camp will be closed upon completion of the proposed Paso Picacho Day Use Area. As you know, the Camp area is a sensitive place for tribal cultural resource issues.

7-22

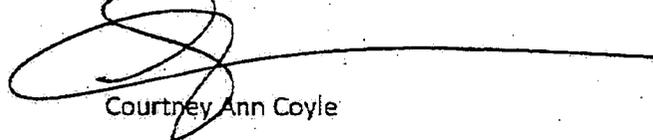
Finally, the DEIR states that existing Park facilities somewhat degrade the view along SR-79 at the proposed Paso Picacho facilities. (DEIR, page 88). We would also add that damage from the Cedar Fire has, at least temporarily, also affected visual quality.

7-23

III. Conclusion

We thank you for considering our comments on the DEIR and are available to respond to any questions or to consult on this project. We look forward to reviewing DPR's responses to these comments.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Courtney Ann Coyle

Attorney at Law

cc: Client file
Interested parties

Letter 7: Courtney Ann Coyle, Attorney at Law

<u>Comment No.</u>	<u>Response</u>
7-1	Ethnographic research was incorporated into Appendix J. DPR is not currently acquiring any additional lands adjacent to the former Merigan Ranch. There will be no direct impacts to riparian or cultural resources in the vicinity of the Paso Picacho Day Use Area (i.e. Cold Stream Trail).
7-2	Thank you for the recommended source. DPR is aware of this source and will consult it when studying and relaying the ethnographic and cultural history of the local tribal people.
7-3	DPR historians concur that murder, manslaughter, and other crimes of violence directed at the local Native Americans, in addition to forced displacement from tribal lands, disruption of traditional lifeways, alteration of the native cultural landscape including subsequent access to traditional resources, along with introduced disease are among the “other factors” that led to the decline in the Kumeyaay populations after Euro-American occupation.
7-4	The reference is to the route’s historic period designation starting in the 1850s as part of the “Alternative Eastern” Road to Yuma.
7-5	DPR would also encourage such a formal survey and inventory. Unfortunately as the vast majority of these properties are not under the jurisdiction of DPR, it would not be the likely candidate to undertake such a survey.
7-6	A section with Native American/Tribal concerns and conditions has been added to the document. We concur with the second paragraph statement in relation to tribal cultural resource concerns. Native American monitoring is already called for in the project along with mitigation measures for addressing any expected or unforeseen historical or cultural resource discoveries. We will include all appropriate procedures in the project specifications to which Native American monitors will have the ability to stop work in areas where cultural, ceremonial, grave goods, or human remains are identified, and be involved in the recordation and evaluation of such. This is a standard specification DPR includes in all such public works contracts. Suspected human remains will be brought to the attention of the County Medical Examiner/Coroner as specified in the Health and Safety Code (7050.5), CCR (Title 14, Division 6, Chapter 3, §15064.5), etc. It is not the practice of DPR to import or export soils containing archaeological site materials or human remains. It is DPR’s practice to include acknowledgment and training to contractors of the sensitivities of all resource concerns and constraints prior to starting construction. Native American consultants/monitors will be consulted in regards to placement of signs/fencing within and around known archaeological sites, and in

regards to interpretive materials relating to Native American culture and resources. It is not anticipated that human remains will be found within the Descanso Area Development project area and it is impractical to water screen all soils within the project area. If human remains are unintentionally discovered and the MLD requests water screening within that area, then we will make every effort to comply with such a request. All new roads and trails associated with this project have been designed to avoid archaeological sites as much as possible.

- 7-7 Comment noted. Design and final siting of the Paso Picacho Day Use Area was done such that the fewest native trees would be impacted.
- 7-8 Comment noted. Please see Response 5-1. The maximum amount of nonnative grassland impacted by the proposed project will be approximately 7 acres, 6 acres for the campground and 0.93 acre for the day use area.
- 7-9 Comment noted.
- 7-10 The reviewer agrees with DPR that subsequent CEQA review for the trail and bridge construction, associated with the conversion of Green Valley Loop A, would be required.
- 7-11 The reviewer agrees with DPR that should the Mack Property be identified as a future location for an equestrian facility, additional archaeological and historic investigations of the property would be required.
- 7-12 DPR has changed the sentence to reflect the terminology used in Archaeological Section 4.4.2.
- 7-13 It is the project historian's professional determination that the Sweetwater Loop Campground has not maintained its historic character-defining landscape features from its potential 1948 to 1960 period of historic significance. Post-1960 alterations, including the realignment of parking spurs, and the removal of many unique stone masonry campstoves and other landscape features, have reduced the campground's historical integrity as a postwar Park Rustic style California State Parks contexted campground.
- The Loop A Campground's landscape improvements lack individual distinction within the larger Green Valley Campground area. Overall, this has contributed to the reduction of character-defining historic landscape features throughout the entire Green Valley Campground area. Because of extensive post-1960 alterations within Loop A as well as the rest of Green Valley Campground, the latter no longer expresses the feeling and association with a 1933 to 1960-built Park Rustic landscape, and would not be eligible for listing on either the National or California registers.

As stated in the DEIR (Appendix G), an example of an eligible intact pre-to-postwar Park Rustic historic landscape district within the Park can be found at the Paso Picacho Campground and Administrative Center to the north.

It is also the project historian's professional determination that the Loop A Campground's 40-year-old stone masonry retaining walls have contextual significance to reflect a degree of exceptional significance on their own to warrant designation on either national or state registers for a property that has not reached the 50 year old criterion. However, recommendations were made that the stone masonry retaining walls at Loop A should be given special consideration during the project's planning, design, and construction phases because of their aesthetic value.

- 7-14 This correction has been made in the Final EIR.
- 7-15 The correct reference is A.E. Kroeber (1971) *Elements of Culture in Native California*. Originally published in 1922 in the *University of California Publications in American Archaeology and Ethnology* 13:260-328. Reprinted in *The California Indians: A Source Book*. Compiled and Edited by R.F. Heizer and M.A. Whipple. This was incorrect in the Archaeological Report and has been corrected in the Final EIR.
- 7-16 Yes, the description is correct. DPR is unsure of the Sacred Site Land File status. Yes, this area will be avoided. Yes, the project calls for at least an 80-meter buffer from the edge of the documented site boundary and construction fencing along edge of project area.
- 7-17 Specifications for DPR archaeologist classifications can be found on the State Personnel Board website:
<http://www.spb.ca.gov/jobs/resources/jobspecs.htm>.
- 7-18 Agreed. The mitigation measures listed on pp.15 and 96 will be rewritten to follow the process spelled out in the Health and Safety Code (7050.5), PRC (5097.98), CCR (Title 14, Division 6, Chapter 3, §15064.5), etc. The text including the line "to the maximum extent practicable" will be rewritten to clarify that burial grounds, and religious and ceremonial sites will be avoided and other archaeological sites will be avoided to the maximum extent practicable.
- 7-19 DPR's efforts to find additional information regarding these collections were unsuccessful.
- 7-20 The collections made during the testing program have been cataloged and are temporarily stored at the Southern Service Center in San Diego awaiting permanent curation at the Colorado Desert District archaeological facility.
- 7-21 Please see Responses 5-9 and 5-13.

7-22 Comment noted.
7-23 Comment noted.

Descanso Planning Group

PO Box 38
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March 25, 2010

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RE: Comments and Concerns on The Equestrian Facilities Project, Cuyamaca Rancho State Park/Draft Environmental Report SCH #2007051074

Project Location: Cuyamaca Rancho State Park-Within the proposed project would occur at three discrete sites including from north to south (1) an area east of SR-79 in the vicinity of the Paso Picacho Campground; (2) Loop A of the Green Valley Campground, which is west of SR-79 in the southern third of the Park; and (3) off Viejas Boulevard adjacent to the community of Descanso at the southern boundary of the Park.

Our comments are concerns sited here are in regard to (3) and (4) the future construction and operation a new equestrian campground and associated facilities within the Descanso Area Development site. Areas (1) and (2) as described in the Description of the Proposed Project are out of the jurisdiction of the DPG. The following comments were approved by the Descanso Planning Group 6-0-0-3 in an additional meeting March 25, 2010:

SUPPORT DAY USE PARKING EXPANSION: The DPG supports the conservative expansion of the Parking Lot at the Merigan Day Use Site that would expand capacity at this existing facility:

- We recommend that the vehicular parking be surfaced with DG or gravel; parking spots need not be delineated.
- The existing gate at the trailhead be left as is and the entryway be widened and left without a gate.
- Sanitation facilities are adequate.
- Trash removal is a necessity at any public trailhead.

8-1

OPPOSE PROPOSED EQUESTRIAN FACILITY: The DPG does not support the construction of a new RV park, equestrian amenities or associated facilities at the Descanso Area Site. We oppose this project because of the following concerns and ask that these concerns be addressed in the Final EIR:

8-2

EQUESTRIAN FACILITY DOES NOT COMPLY WITH PARK'S GENERAL PLAN: The draft EIR ignores that the scope of the proposed alternatives are clearly not in compliance with the Park's General Plan. It does not address the finding that a separation buffer between a public school and an equestrian staging area limits the scope of any future development. A

8-3

finding that the community has been trying to plea in the limited public comments that we have been afforded.

Section 4.7 LAND USE AND PLANNING mentions related plans but disregards the content of those plans. As a result, the findings 5.2.3 Land Use/ Planning are not an accurate reflection of the contents of the quoted plans.

The report ignores the Park's General Plan for use of the Descanso Area which states on page 45-46, "The plan recommends a new equestrian group camp and trail head in a one- to two-acre site off Viejas Boulevard, next to the town of Descanso...Recommended facilities include a parking lot, holding corrals, a hitching rack, watering troughs, camp furniture, and a restroom. The camp is recommended to accommodate 15 to 25 people and horses. Horseback riders and day-use hikers will have access to the southern part of the park from this point. They can also camp overnight in one of the trail camps and continue to more distant destinations..."

The January 21, 1986 Descanso Planning Group letter of support to James M. Doyle, Environmental Review Section, California Department of Parks and Recreation clearly identifies the communities understanding of the scope of the contemplated use when specifying "to accommodate 15 to 25 horses and people."

Only the environmentally superior alternative remotely approximates the use specified in the Park's General Plan. The scope of the Preferred Alternative and Alternative 2 would clearly require a Park's General Plan amendment. The Draft EIR attempts to justify this change on page 9 by saying, "The General Plan also allowed for expansion of the Descanso Area Development beyond the initial recommended size of 1-2 acres." However, it ignores the condition on page 51 of the General Plan that the school be sold to the Park to serve as park maintenance and storage stating, "The equestrian camp as proposed in the plan would have potential for expansion, because there would be less need for a buffer/separation between park maintenance and storage/equestrian staging than between public school/equestrian staging." This critical omission can be viewed as extremely disingenuous at best or marginally dishonest at worse.

The Park's General Plan clearly establishes the need to separate equestrian from public school and would require a major amendment to disavow this finding in order to allow the Preferred Alternative or Alternative 2.

RV PARK AND EQUESTRIAN FACILITY IS NOT COMPATIBLE WITH COUNTY'S GENERAL PLAN: The Draft EIR is flawed in its conclusion and reflects a lack of an honest appraisal related to the Descanso Area Development. The Descanso Area Development (Programmatic) analysis continues to hide behind a quaint, historical image of camping when families would leave their homes to rough it in tents enjoying the outdoors, lighting the night with a Coleman lantern until an early bed time. Modern horse camping has become taking a home with you in diesel driven buses, demanding electrical hook-ups or living with the droning of generators, to support televisions and stereos for partying into the night.

The Draft EIR continues this charade by analyzing the impact of the Descanso Area Development as a horse camp and not as an RV Park with equestrian facility replete with arenas, round pens, and a ramada to accommodate 50 individuals.

8-4

8-5

When stripped of its "camping" facade and viewed through the lens of modern recreational vehicles, the Preferred Alternative places 18 manufactured homes with horses on 20 acres of land. Providing parking for an additional 15 units for commercial like day use of an equestrian facility. A residential density and use that far exceeds the community's guidelines contemplated in the County's current General Plan, or the General Plan Update, or currently existing development in the Descanso community.

8-5
(cont.)

The Descanso Planning Group (DPG) submits the following concerns and comments regarding the proposed Equestrian Facilities Project:

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.

8-6

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.

8-7

3. This project will substantially degrade the existing visual character of the site and its surroundings. It is a concern that land owned by the State of California is exempt from the Night Skies Ordinance. Attempts at mitigation by reduced or subdued lighting does not alter the fact that neighboring residences will be affected every night by this new source of lighting from this project.

8-8

4. The Descanso Elementary/Middle School is a historic building. The project will degrade the visual character and quality of the school

8-9

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.

8-10

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.

8-11

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.

8-12

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.

8-13

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 | 8-14

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. | 8-15

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. | 8-16

2. This is a meadow, seasonal wetland and wildlife corridor. This project will carry significant impact to wildlife and their habitat. | 8-17

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. | 8-18

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. | 8-19

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? | 8-20

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. | 8-21

2. In dry years, high levels of visitor and equine use will increase the loss of topsoil. 8-22

3. In wet years, high levels of visitor and equine use will cause significant runoff in already degraded topsoil to occur. 8-23

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. | 8-24

5. Groundwater is at surface level during the wet season in this meadow. Consequently, this will affect percolation of septic systems in this area. | 8-25

6. Removal of the horse manure in wet, marshy soil becomes improbable, if not impossible. | 8-26

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. | 8-27

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. | 8-28

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. | 8-29

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. | 8-30

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. | 8-31

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. | 8-32

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.

8-33

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.

8-34

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

8-35

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.

8-36

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.

8-37

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.

8-38

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 Agreement between the school district and the Department of Parks of Recreation for the County of San Diego. The Draft EIR is in error. The Joint Powers did not expire.

8-39

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.

8-40

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.

8-41

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.

8-42

2. This project also has the potential to cause harm to the Descanso Elementary/Middle school children and its staff through exposure to increased insects, a transient population, respiratory problems from manure and dust, noise and increased traffic congestion.

8-43

In addition to all the concerns and comments listed above, we would like to add that at a time when our State's budget is in critical condition, parks are being closed, needed maintenance on existing facilities is being delayed indefinitely, and state employees are losing their jobs. It is incomprehensible that a costly project such as this could even be suggested. We have been told extensive grading and filling would be necessary to make this boggy meadow suitable for use by large animals. This creates a situation where huge amounts of money are needed. This money would be better spent on keeping existing facilities open and preventing loss of employment.

8-44

No supervision of this campground is proposed. There is no one to monitor a transient population immediately adjacent to the elementary school, library and homes. California's children are our most valuable asset and need to be protected! With no full time supervision,

8-45

there is no one to monitor who is camping there, how they behave, or the risks they pose to elementary and middle school students.

The foregone conclusion of the analysis is demonstrated again in 5.2.3 with the inaccurate assessment blithely stating, "Many of the residents in Descanso have horses and livestock on their property, but some do not." Any fair minded analysis would readily conclude, "Some of the residents in Descanso have horses and livestock on their property, but most do not."

Stretching to seemly balance the impact, the analysis pretends, "This change may benefit some members of the community; primarily those that would use the campground and its amenities." It is laughable to imagine community equestrians camping within miles of their homes and corrals. The sentence at least concludes with an accurate analysis, "however the development may alienate other residents." Perhaps a lot of other residents, may be even more accurate.

8-46

The Descanso community has been plagued by the modern twisting of its history as a camping friendly place for San Diegans. Proposals for large scale RV facilities are tossed about as if everyone would be pleased with one next door. When the Descanso Planning Group attempts to negotiate the scope of these outlandish intrusions next to our school and library, we are branded as hostile to the state park and ignored.

We appreciate that any future implementation of the Descanso Area Development will require further CEQA analysis. We look forward to future discussions aimed at scoping a use that complies with the intent and findings of the Park's General Plan. We just hope it is a more serious attempt than the Draft EIR regarding the Descanso Area Development (Programatic). We thank you for time and attention to this matter. We look forward to your response to our concerns.

If you have questions, please feel free to call Terry Gibson at 619-445-0433 or Jo Ellen Quinting at 619-445-7462.

Respectfully,

M. A. Sterns

Michael A. Sterns, Chair

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
Ruth Coleman, Director of State Parks
Senator Dennis Hollingsworth
Jose Aponte, Director San Diego County Library
Brian Bruce, General Manager, Descanso Community Water District
Friends of the Descanso Library
Nedra Martinez, Superintendent for Cuyamaca State Park

Letter 8: Descanso Planning Group

<u>Comment No.</u>	<u>Response</u>
8-1	The reviewer supports day use development at the Descanso Area. As stated in the DEIR (p. 31) the parking area would consist of decomposed granite or gravel and parking spaces would not be delineated. The entryway will be gated to deter nighttime use of the site in order to reduce disturbance to the neighboring properties. As stated in the DEIR (p. 31), trash will be removed from the site on a regular basis.
8-2	The reviewer opposes the alternative identified in the DEIR as the preferred alternative for the Descanso Area Development Phase II project.
8-3	The General Plan does allow use of the Descanso Area Development site for equestrian camping but the reviewer is correct in that use was identified as 1-2 acres. Use could be expanded at this site if the school property was purchased by the State. This correction has been made in the EIR. As stated in Response 5-1, the Preferred Alternative for this project has been changed to the Environmentally Superior Alternative, which would impact a maximum of 6 acres and provide 5 equestrian campsites.
8-4	Please see Response 8-3.
8-5	The proposed project is not an RV Park, nor would it include manufactured homes. Please see Response 8-3.
8-6	Information provided by the reviewer was acknowledged by DPR in the DEIR (pp. 87-88).
8-7	As stated in the DEIR (p. 88), DPR would voluntarily comply with San Diego County's Light Pollution Code Sections 59.105 and 59.106.
8-8	Lighting associated with the Descanso Area Development will be minimal and will be equivalent to the County's Light Pollution Code requirements.
8-9	According to the DEIR (p. 67), the Descanso Elementary School is not listed on any local, State or national landmark registers; however the project historian has determined that it may be potentially eligible for listing at the local/County level. According to the project historian's revised analysis in Appendix G, the Descanso Area Development project will not have a significant impact on the school building's historic integrity.
8-10	The berms will not only screen the campground from view but will raise the elevation of the planted material. As stated in the DEIR (pp. 88-89) fugitive dust will be generated during the construction of the campground; however Project Requirements will be

implemented to ensure this impact is less than significant. As stated in the DEIR (p.62), DPR staff conducted an Army Corps of Engineers wetland delineation of the site. Based on this delineation, there are no federal jurisdictional wetlands present at the Descanso Area Development site. Even though the area may be subjected to temporary seasonal flooding during large rain events, the planting of native vegetation within the project site would be appropriate for the various site conditions.

- 8-11 Please see Response 5-9 and 5-13.
- 8-12 As shown in the DEIR (Figures 2.11-2.13), an RV dump station is not proposed as part of the Descanso Area Development. Please see Response 5-7.
- 8-13 Please see Response 5-17. Impacts to Air Quality as a result of dust during construction will be less than significant. During operation, dust will be minimized due to soil compaction and the installation of decomposed granite throughout the campground and day use sites.
- 8-14 As shown in the DEIR (Figures 2.11-2.13), manure bins will be provided in the Descanso Area Development campground and campers will be required to keep their campsites clean of horse manure on a daily basis. Campers are likely to do this anyway in order to keep the campsite clean while it is in use. At the Descanso Day Use site, users currently remove and dispose of the horse manure and this will continue to be the policy after the area has been expanded. Please see Response 5-7.
- 8-15 Please see Response 5-44. Due to the small number of campsites, bees and mosquitoes are not expected to increase in the area as a result of the proposed project.
- 8-16 As stated in the DEIR (p.52), the Descanso Area Development site supports non-native grassland species and does not act as a “regenerative area” for any section of the Park.
- 8-17 Please see Response 8-10. The Descanso Area Development site supports non-native grassland that has been highly disturbed since the late 1800s. As stated in the DEIR (p. 53), although the Park functions as part of a regional bio-corridor complex, according to the South Coast Wildlands, there are no major dispersal linkages in the project vicinity. The project does not pose significant impacts to wildlife or their habitat.
- 8-18 Runoff from the Descanso Area Development, including parking lots and various camp facilities; will be treated in vegetated swales prior to leaving the property. Additionally, as stated in the DEIR (pp. 99-101), the proposed project will comply with all local and State water quality regulations for new development including the submittal of a

Stormwater Pollution Prevention Plan to the State Water Quality Resources Control Board.

- 8-19 Please see Responses 8-10 and 8-17.
- 8-20 DPR is aware of the archaeological site referenced and has addressed its appropriate treatment in the DEIR (p. 73; Appendix J).
- 8-21 Please see Responses 8-10 and 8-17.
- 8-22 Topsoil in the campground will be monitored for potential erosion by Park personnel.
- 8-23 Please see Response 8-18.
- 8-24 Please see Responses 8-10 and 8-17.
- 8-25 As stated in the DEIR (p. 38), a conventional septic system is not feasible at the Descanso Area Development site and therefore, would not be installed as part of the project.
- 8-26 Campground users will be required to clean-up after their horses on a daily basis during all weather conditions. Although some horse waste may be washed away from a particular campsite, it would be collected in the vegetated swales. Please see Response 8-18.
- 8-27 Please see Response 5-17 and 8-14.
- 8-28 According to the Central Mountain Community Plan (p. 10) the community of Descanso has a “high” proportion of residents that keep horses or other animals; therefore horses and other livestock currently live in the vicinity of the school. The project will adhere to all Public Health and Safety Codes and Regulations.
- 8-29 As stated in the DEIR (p.107), no significant impacts to traffic will result from implementation of the proposed project. As stated in the DEIR (Appendix E) the TIS reports that only a minor amount of trips will be added; therefore operation of these facilities will not hinder evacuation of the Descanso community during a disaster.
- 8-30 Please see Response 8-25.
- 8-31 Surface nitrates will be addressed with detention ponds and vegetated swales.
- 8-32 A groundwater study will be performed during design.
- 8-33 Please see Response 5-60.
- 8-34 Please see Response 5-60.
- 8-35 Comment noted.
- 8-36 Please see Response 5-46.
- 8-37 As stated in the DEIR (p. 105), the proposed project will have a less than significant impact on Public Services.

- 8-38 The Descanso Area Development project would not be expanded beyond what is proposed in the EIR. As stated previously, DPR has chosen to implement a smaller scale project than what was previously identified in the DEIR.
- 8-39 The reviewer's comment was acknowledged by DPR in the DEIR (p.30); however ultimate responsibility for the operation and maintenance of the MEUSD 2-acre park lies with the school district and the County.
- 8-40 Please see Response 8-29.
- 8-41 Please see Response 8-29.
- 8-42 As stated in Section 5 of the DEIR, impacts to biological resources and archeological resources will be less than significant with mitigation. As stated in the DEIR (pp. 104-105), implementation of the proposed project will not result in a significant increase to the likelihood of a forest fire in the community of Descanso.
- 8-43 Please see Responses 8-14, 8-15, and 8-29.
- 8-44 Comment noted. Please see Response 8-10.
- 8-45 For the Preferred Alternative identified in the DEIR, a camp host would be present during the operation of the campground (please see Figure 2.11). Also, a Park employee residence is adjacent to the site providing at a minimum, Park personnel presence in the area. Maintenance staff would also be present on a daily basis. Lastly, the Park has the highest visitor use during the summer months and on weekends. These are the times when the school is closed.
- 8-46 As stated in the Central Mountain Community Plan (1979), the community of Descanso has a "high" proportion of residents that keep horses or other animals. Comment noted.

Environmental Review

From: Ernie Smith [ernestoz@yahoo.com]
To: Environmental Review
Cc:
Subject: Cuyamaca Rancho State Park Equestrian DEIR
Attachments:

Sent: Fri 4/2/2010 11:43 AM

The Cuyamaca Equestrian Association supports the State Park's Draft EIR regarding equestrian facilities in Cuyamaca Rancho State Park.

9-1

Ernest R. Smith

President

Cuyamaca Equestrian Association

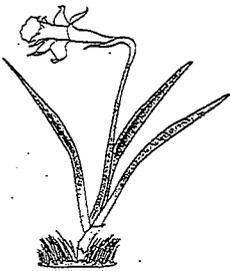
Letter 9: The Cuyamaca Equestrian Association

Comment No.

Response

9-1

The reviewer supports implementation of the Equestrian Facilities Project.



ruth D'Spain
P. O. Box 173
Descanso, CA 91916
619 445 1703
ruthdspain@rbdspain.cts.com

Christine Beck, Environmental Coordinator
California Dept. of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
enviro@parks.ca.gov

February 22, 2010

Subject: Comments regarding the Draft Environmental Impact Report SCH# 2007051074

- (1) The conversion of the Green Valley Family Campground Loop A (sites 1-22) to an equestrian campground containing 10-15 sites; and
- (2) the construction and operation of a day use staging area at the site known as Paso Picacho East, referred to herein as the Paso Picacho Day Use Area; *meet with my approval as planned.*
- (3) the construction and operation of an expanded day use staging area within the site known as Merigan Ranch, referred to herein as the Descanso Area Development Interim Day Use Parking Area; *I can live with, but unsure that all environmental factors have been addressed.*
- (4) the future construction and operation of a new equestrian campground and associated facilities within the Descanso Area Development ; **do not meet with my approval.**

My concerns remain as stated in my previous letter to Karen Miner, Project Manager which is printed in this Draft EIR as stated: Loss of meadow and wetland, downstream contaminants of nitrites re animal urine and manure, fly infestation at the Descanso Elementary School and the Descanso Library, contaminants into the Sweetwater river and the Descanso Creek, not keeping with Neighborhood Character as described in the Central Mountain Subregional General Plan, loss of viewshed of Descanso residents particularly those who reside on Mizpah Lane and Mizpah Spur, TRAFFIC, NOISE, **meadow fill to avoid the high groundwater situation**, archeological sites will be destroyed; air quality in the Descanso Valley will be severely downgraded a detriment to residents, WATER usage in an area that has NONE to spare, and last but not least, **fire danger** not addressed to my satisfaction.

The one alternative: Descanso Area Development: the **Environmentally superior alternative** is the **only one** that should be considered, *if any development is insisted upon by the CA Dept of Parks and Recreation.*

As a lifelong native of San Diego County, an over 20 year resident of Descanso, I am appalled at the thinking of the CSP&R department. We moved here for what it is, a quiet, noise and traffic free community. **The CSP&R should not believe it can change OUR environment.**

ruth D'Spain

Please note the following as stated in the CRSP General Plan
All of which shall be addressed and considered regarding the
Draft EIR SCH#2007051074

Notes from Cuyamaca Rancho State Park General Plan
As pertains to Con re the Merigan Fire Road Equestrian Project.

Page 9: Hydrology; The Park is within parts of five major watersheds. The Upper Sweetwater River watershed is the most extensive watershed in the park. The Sweetwater River flows south through the central portion of the park toward Descanso and then west.

Major tributaries to the Sweetwater are: ...among those stated is Descanso Creek.

Page 11: re Plant Life: re this Project area: Among 13 plants listed by the California Native Plant Society as rare and or rare and endangered occur in the park. One of these *Limnanthes gracilis var. parishii* (Parish's Meadow foam) is listed as endangered. *Calamagrostis densa* (dense reed grass) may occur. | 10-2

Page 19: Resource Management Policies: Hydrologic Resources: Surface water is particularly critical to esthetic and recreational values. Surface water is particularly critical to wildlife during dry summer months. (as occurs in the Project Area and beyond which will be impact: the Falls) | 10-3

Riparian areas are fragile, and even limited soil disturbance or loss of vegetation will result in increased sedimentation and degradation of aquatic environments. | 10-4

Pages 20-21: Soil Resources: The surface texture of the soils at Cuyamaca is extremely susceptible to disturbance and dislocation. Particularly sensitive areas are in meadows.(followed by etc.) page 20. | 10-5

Page 21: Policy: Destructive or unnatural erosion shall be controlled and prevented by means that are in harmony with the purpose of the park.
Due to the heterogeneous nature of the soils in the park, a site-specific soil survey shall be made before the sitting and development of new facilities.

Page 23 re Policy : Landscaping around public facilities shall include species which are native to the area. | 10-6

Page 24 re Meadows: The meadows at Cuyamaca Rancho State Park are particularly fragile
Policy: Meadowlands, which are an important ecological and scenic resource in the park, shall be protected to the maximum extent possible from impairment caused by human use.
Any new visitor facilities shall be located away from meadow environments. | 10-7

Page 30 re Esthetic Resources: Policy: Management of the park shall be toward reduction of man-made intrusions on the natural scene. | 10-8

It is my understanding, as a long time past member of the Descanso Planning Group, that SHALL means absolute.

ruth D'Spain

enclosure with letter regarding Draft EIR SCH# 2007051074

Letter 10: Ruth D'Spain

<u>Comment No.</u>	<u>Response</u>
10-1	Please see Responses 8-10 (loss of wetland/meadow), 8-18 (downstream contaminants), 5-44 (fly infestation), 5-60 (neighborhood character), 8-6 (loss of viewshed), 8-29 (traffic), 5-45 (noise), 5-9 (air quality), 8-32 (groundwater), and 8-42 (fire).
10-2	Please see Responses 5-23 and 8-10.
10-3	Please see Response 8-18.
10-4	No riparian areas will be impacted at the Descanso Area Development site.
10-5	Please see Response 5-23. As stated in Appendix C (p.7), Calpine sandy loam soil is present throughout the Descanso Area Development site; no hydric soils are present. This soil type is well drained with very low or low surface runoff and moderately rapid permeability. Therefore, erosion of soil in this area is expected to be low.
10-6	As stated in the DEIR (p.38), only native species would be used in the landscaping plan for the Descanso Area Development.
10-7	Please see Response 5-23.
10-8	The General Plan goes on to state that "Facilities shall be concentrated in specific use areas, and not scattered throughout the Park." The Equestrian Facilities Project adheres to this policy. All three project sites already support visitor use facilities: day use site at Descanso, campground, day use, etc at Paso Picacho, and Loop A is already a campground.

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

February 21, 2010

Christine Beck, Environmental Coordinator
California Department of Parks and Recreation, Southern Service Center
8885 Rio San Diego, Suite 270
San Diego, CA 92108

RE: Equestrian Facilities Project, SCH #2007051074
Cuyamaca Rancho State Park, San Diego, CA

Dear Ms. Beck,

Recognizing the extreme need for equestrian recreational opportunities in the Cuyamaca Rancho State Park, my family enthusiastically supports the proposal for the Descanso Area Development Interim Day Use Parking Area, across from the Merigan Ranch in Descanso. Additionally, when funding is available, we encourage the construction of an equestrian campground and adjunct facilities at the site.

11-1

As you know, these proposals are located on property that the Merigan family donated to the State of California several years ago, with the specific intent that an equestrian camp facility be constructed there. With the blessing of the Descanso community, the property had been used to pasture cattle and grow feed since we purchased the land in 1958. Prior to that, the former owner also conducted a livestock business there for many years. Additionally, the property contained several rental homes that were razed by the State of California after the purchase. Contrary to what some newcomers to Descanso have stated, this property is not a pristine meadow but had been disturbed by residences and agricultural operations for many years prior to the Park's stewardship.

11-2

My brother Bob Merigan and I have attended all past workshops and meetings concerning these proposals. Taking into account the prior use of the land, its easy access to main highways, and its ideal location at the southern end of the Park, we came to the conclusion that any minor negative aspects of the project can and should be easily mitigated. The Merigan family intended our property donation to be used by all the people and not just the privileged few. The Descanso Equestrian Facilities Project and current proposals are the right projects in the correct location, and we are thrilled to lend our enthusiastic support for their approval.

11-3

Sincerely,


Joyce A. (Merigan) Peterson

Letter 11: Joyce A. (Merigan) Peterson

<u>Comment No.</u>	<u>Response</u>
11-1	The reviewer supports the proposal for the Descanso Area Development.
11-2	The reviewer agrees with DPR that the Descanso Area Development site is not a meadow and was used for many years as an agricultural operation.
11-3	The reviewer states that the Merigan family intended the Descanso Area Development property “to be used by <u>all</u> the people...”

PETITION TO STOP DEVELOPMENT
 OF THE CUYAMACA RANCHO STATE PARK
 EQUESTRIAN FACILITY
 AT THE DESCANSO AREA DEVELOPMENT SITE

This project is planned for development off Viejas Blvd. adjacent to the community of Descanso at the southern boundary of the Park.

This project will be located immediately next to the Descanso Elementary/Middle School and Library.

We, the undersigned do hereby reject the development of an equestrian facility next to the school. We question the wisdom of the State of California Department of Parks and Recreation in their decision to even consider a development of this type of facility next to a school. We are committed to a safe school in Descanso and this project with the contaminants, traffic and noise are detrimental to the children and staff at the school. This project will also destroy the environment, the wildlife habitat, the pristine meadow and the peace and quiet for the surrounding residents of this area.

12-1

We call on the State of California Department of Parks and Recreation to cease consideration of this project.

Cuyamaca Rancho State Park consists of approximately 27,000 acres. There must be a more appropriate site within the Park for this facility.

1. Jerry Gibson 9452 Hwy 79 Descanso Ca 91916
2. David Moore 24445 Los Terrinitos Alpine Ca 91901
3. Kathleen Novo 23093 Viejas Grade Rd Descanso CA 91916
4. Mary machado 24766 Oak Lane Descanso CA 91916
5. Joni Meyer 24774 Oak Lane Descanso Ca 91916
6. Christine Buckmaster 9678 barwood " "
7. Lester Buckmaster " "
8. Nicholas Buckmaster " "
9. Timothy Buckmaster " "
10. Sherrie Carter 9717 Mizpah Spur Descanso, CA 91916
11. Rachel Antle 24668 manzanita Dr Descanso CA 91916
12. Donald E Hickle 5274 Hwy 79 Descanso, CA 91916
13. Sandra Wilson 25280 Manzanita Ln Descanso CA 91916
14. Bill M 28736 Airport Camp CA 91916
15. Cathy Bryson 24660 manzanita Descanso Ca 91916
16. ~~XXXXXXXXXX~~ PO Box 315 Descanso Ca 91916
17. ~~XXXXXXXXXX~~ 25064 VIEJAS BLVD DESCANSO, CA 91916
18. ~~XXXXXXXXXX~~ 25064 VIEJAS BLVD Descanso, CA 91916
19. Terry Dawson 28651 Lebanon Rd Pine Valley CA 91962
20. Corinne Lewis 8842 Valencia St Spring Valley CA 91977
21. Ted Fernandez 33427 Otero way Ramona CA 92065
22. Jennifer Burette

23. Anna Marie Brown 2988 River Shadow Ct, Alpine 91901
24. ~~Ann Fancher~~ 24928 VIEJAS BLVD DESCANSO, CA 91916
25. Donna L Pardue 24928 Viejas Blvd Descanso 91916
26. ~~Smx w. Pardue~~ 24928 Viejas Blvd. 91916
27. Fred O Salmons 24944 VIEJAS Blvd 91916
28. ~~Todd Salmons / Todd~~ 24938 VIEJAS Blvd 91916
29. Kelly Salmons Kelly Blair 24938 Vieja's Blvd. Descanso, 91916
30. Deborah Salmons 24944 Viejas Blvd Descanso Ct 91916
31. Debra Etzel 11808 Gray Rio Lane Lakeside, CA. 92040
32. Tami Hunt 2033 Via Torino Alpine CA 91901
33. Donna Duffy 3800 Via Palo Verde Lago, Alpine, CA 91901
34. ~~Donna Duffy~~ 2880 Via Torino Alpine CA 91901
35. Travis Serrano 9412 Hwy 79 Descanso CA. 91916
36. MARILYN SALZANO 9413 hwy 79 Descanso CA 91916
37. Janet ~~put~~ 23955 Barnessa Ct. Panama CA 92061
38. ~~Janet~~ 1498 Ramsey Rd Alpine CA 91901
39. ~~Donna Duffy~~ 9532 Mirpan Ln Descanso, CA 91916
40. ~~Donna Duffy~~ 23324 Viejas Blvd Rd Descanso 91916
41. Gloria J Navea 6105 Starbright Lane Alpine 91901
42. Emily Jesu 2625 County Meadows 1922
43. ~~Esther~~ 1030 Alpine Oaks Dr. Alpine CA 91901
44. ~~Donna~~ 350 Lento Lane Cresta 92021
45. Kathy Olphant 9022 Hunter Pass Alpine 91901
46. Janice Ironside 2418 Hiabeau Ln Alpine 91901
47. ~~Janice~~ PO Box 175 Descanso, CA 91916
48. Sara Shelton PO Box 175 Descanso, CA 91916
49. ANDREW SHELTON PO Box 175 Descanso, CA 91916
50. Cheryl Melban PO Box 135 Descanso CA 91916
51. Pat Behner 25114 Oak Lane Descanso CA 91916
52. EPIC BEHEIM 24125 Viejas grade 91916
53. Stella Bunous 226 Murray Dr, 92020
54. Bob Bunous 9885 Deer Valley Trail 91916
55. Kathleen Sikes 24019 Japetal valley Rd Descanso 91916
56. Jackie Lynn Bleytle 3630 CRYSTAL RIVER ROAD, ALPINE, CA. 91901
57. ~~Joellen~~ 23514 Bell Bluff Tr. Alpine CA 91901
58. John Martin 9871 Mizpah Ln Descanso, CA 91916
59. Kathy Zanet 24334 Manzanita Ln, Descanso, CA 91916
60. Diana Parker 8542 BOULDER DR. LA MESA, CA 91941
61. ~~Candice~~ 28710 Lone Pine Tr. Pine Valley, CA 91962
62. Janet Johnson 9421 Elm Dr. Descanso, CA 91916
63. ~~Janet~~ 13725 Boulder Creek Rd Descanso CA 91916
64. ~~Janet~~ 25272 Oak Ln, Descanso, CA 91916
65. ~~Janet~~ 2657 Victoria Circle Alpine, CA 91901
66. ~~Janet~~
67. ~~Janet~~
68. ~~Janet~~

69. Natalie Green 8502 Hwy 79, Descanso, CA 91916
70. Kelsey Gilmore 10499 Hwy 79, Descanso, CA 91916
71. Ruth D Spain POB 173 Descanso CA 91916
72. Karen Galebari PO Box 383 Descanso CA 91916
73. Lori Hamelchle P.O. Box 478 Descanso, CA 91916
74. Teresa Bell 9818 Meadow Lane Descanso CA 91916
75. Marianne Green 8502 Hwy 79, POB 282, Descanso, CA 91916
76. LINDA COTA 2900 OAK LN DESCANSO CA 91916
77. Leticia Ruiz 29905 Hwy 94 Campo, CA 91906
78. DENISE PRIESTER 2257 HALEMORUA DR. CAMPO, CA 91906
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PETITION TO STOP DEVELOPMENT
OF THE CUYAMACA RANCHO STATE PARK
EQUESTRIAN FACILITY
AT THE DESCANSO AREA DEVELOPMENT SITE

This project is planned for development off Viejas Blvd. adjacent to the community of Descanso at the southern boundary of the Park.

This project will be located immediately next to the Descanso Elementary/Middle School and Library.

We, the undersigned do hereby reject the development of an equestrian facility next to the school. We question the wisdom of the State of California Department of Parks and Recreation in their decision to even consider a development of this type of facility next to a school. We are committed to a safe school in Descanso and this project with the contaminants, traffic and noise are detrimental to the children and staff at the school. This project will also destroy the environment, the wildlife habitat, the pristine meadow and the peace and quiet for the surrounding residents of this area.

We call on the State of California Department of Parks and Recreation to cease consideration of this project.

Cuyamaca Rancho State Park consists of approximately 27,000 acres. There must be a more appropriate site within the Park for this facility.

- 1 Kathleen Anderson 8413 Steeply Way El Cajon CA Kathleen Anderson
- 2 Dianne Anderson 1432 Rock Ten Alhambra CA Dianne Anderson
- 3 Kim Asfzadon 2143 Vintage Pl Escondido Ca. Kim Asfzadon
- 4 Linda Mullig 240 Editha Dr. El Cajon Ca Linda Mullig
- 5 Jeanne P. 1498 Ramsey Rd Alpine CA Jeanne P. Prins
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Letter 12: Terry Gibson

Comment No.

Response

12-1

The reviewer opposed the Descanso Area Development project and includes reasons for this opposition. The reviewer included an additional 82 signatures of people opposed to the proposed project.



DIANNE JACOB

SUPERVISOR, SECOND DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

April 13, 2010

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Viejas

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

Dear Ms. Miner:

As Supervisor to the Second District for the County of San Diego, which includes the community of Descanso, I write in support of the Descanso Community Planning Group's comment letter on the Draft Environmental Impact Report for the Equestrian Facilities Project at Cuyamaca Rancho State Park.

13-1

I applaud the State's commitment in moving forward to restore Cuyamaca Rancho State Park after it was almost fully destroyed during the 2003 Cedar Fire that ravaged this region. Unquestionably, the park has long been valued both locally and regionally for its pristine camping sites as well as riding and hiking trails.

13-2

It is my understanding that 3 of the 4 major park improvements are embraced by all parties of interest. However, I, like the community have concerns with the proposed equestrian facility at the Descanso Area Development (Merigan site). While I believe that everyone values the recreational and equestrian amenities that this project would provide, there are concerns that the magnitude of this project at this location would have significant unavoidable impacts to the rural area and surrounding uses.

13-3

Therefore, I would like to extend an offer to meet with you, the Cuyamaca Equestrian Association and members of the Descanso Community Planning Group, in an effort to discuss this issue more thoroughly and work towards finding an amenable solution for all sides.

13-4

Thank you in advance for your consideration. Please give my scheduler Alice Re a call at (619) 531-5522 to coordinate calendars. I look forward to meeting with you.

Sincerely,

DIANNE JACOB
Supervisor, Second District

DJ:aw

Letter 13: Dianne Jacob, San Diego County Supervisor, Second District

This letter was received after the official comment period had closed; however DPR has considered the information provided by the reviewer in the decision making process.

<u>Comment No.</u>	<u>Response</u>
13-1	The reviewer states that she is in support of the Descanso Community Planning Group's comment letter.
13-2	The reviewer commends DPR for the restoration efforts implemented at the Park since the 2003 Cedar Fire.
13-3	After further consideration and due to current site conditions and constraints, DPR has adopted the Environmentally Superior Alternative for the Descanso Area Development Phase II project.
13-4	DPR staff contacted the reviewer upon receipt of this letter. Because DPR has agreed to adopt the Environmentally Superior Alternative for the Descanso Area Development Phase II project, no subsequent meeting will be necessary.