

Guidance For Commenting on the Alpine County Park Draft Environmental Impact Report (Comments due by 5 PM November 15th)

Dear Letter Writer,

The following advice on how to provide public comments on the Draft Environmental Impact Report (DEIR) for the proposed Alpine County Park is laid out in the form of a conventional, formal business letter. Comment letters are due November 15th by 5 PM. Remember to:

- Include page numbers
- Keep the language straightforward and simple
- Use the structure of your letter to highlight the important points
 - Write each paragraph to address one topic
 - The first sentence of each paragraph is the topic sentence which tells what the paragraph is about. The rest of the paragraph supports the point or makes an argument. If the paragraph makes an argument, the final sentence of the paragraph is the conclusion statement.
 - If you are addressing multiple related points (say about alternative designs), it's good to use subheadings (**Alternative Design Issues**), even multiple layers of subheadings if you need to (*Lack Of A Nature-Based Park Design*)
 - Bulleted lists may also be useful to make a number of short, related points.
- Avoid being a NIMBY. What does NIMBYism sound like? In general, it is an argument that your community is good the way it is. That you moved there to get away. That you spent a lot of money trying to get the lifestyle that you want. That it's beautiful as it is. If only the decision makers spent any time there, they'd know that the project would wreck it. The trick is not to talk about what you want, but about how the project will make more problems for the County than it will solve, while what you are proposing is a better solution than what the County planners came up with.

Important point: use Jeopardy style. Make your key points in the form of questions, as done on the game-show *Jeopardy*. This is because the County of San Diego Department of Parks and Recreation (DPR) has to respond to all comments received. While they are allowed to get away with saying "comment noted," they are supposed to answer all questions. So in other words, do not state the shortcomings of the park alternatives, ask them: Why was my preferred alternative rejected, even though I put it in a letter that you received (Appendix B, page X)?

What to read? Read the sections of the DEIR that you are most interested in. You **DO NOT** have to read it all and can use your computer's search function to find key terms you care about. You can also read each section in reverse order, because sometimes they try to snow you with what's at the beginning so they can slip in a fast one at the end. We suggest reading Volume 1 in this order:

- Executive Summary (if you are in a hurry, this and chapter 6 are probably the most important)
- Chapter 1. Introduction
- Chapter 2. Setting (especially if you are an Alpine Resident. Is it correct? Is anything missing?)
- Chapter 3. Project Description
- Then skip to Chapter 6: Alternatives. Do you see the alternative that you wanted? If not, was it considered but rejected? Or was it not considered at all? Did you send in a letter asking for them to consider that option? Is that letter in the other file (Volume 2, Appendix B)? This is a

critically important question, because a DEIR should consider alternatives that a number of people ask for, even if it rejects them as infeasible.

- Then go back to Chapter 4. This is the technical analyses section. Mitigation is what they are going to do to fix the problems they found, and it is often boilerplate language impacts should be avoided altogether but if they cannot be avoided, they should be mitigated. If they cannot be mitigated, the impact is unmitigable, and the Board of Supervisors has to decide if the good created by the park outweighs the damage caused by the impacts of building it. Ask yourself, does the mitigation measures proposed address the impacts? For example, in the geology section, they may note that the area is known for its unique geological setting, and that there is a low chance for fossils to occur, and that the project will damage the site's unique geology. Then, as mitigation, they may have a paleontologist on site to rescue any fossils that excavation turns up. Did they mitigate the damage to the unique geology, or not?

Many Alpine residents are experts on two things: Wright's Field Ecological Preserve and how to get to the site of the proposed park.

- Increased use of trails through Wright's Field Ecological Preserve is very far from non-impactful. There's a whole journal devoted to the topic (known as "recreation ecology") in Appendix B, for that reason. Therefore, you need to ask yourself, did the DEIR adequately study all the impacts from more people using Wright's Field? Did they properly mitigate them? What is missing?
- Safe access to and from the park is a major concern with the proposed park. Ask yourself, how will adults and children access the park site safely? Did the DEIR adequately study all impacts for more people traveling to the site? Did they properly mitigate them? What is missing?

Here is an incomplete list of problems with the DEIR:

- Climate change and decarbonization. Manufacturing concrete emits a lot of CO₂, as does excavation and paving. The County is trying to go carbon neutral by 2035, and it's not clear if there will be a carbon neutral concrete by then. Parks have to be repaired and rebuilt. Any facility that requires a lot of emissions to rebuild will have to be torn down or abandoned after a few decades. Do you want this park to be a white elephant?
- Alpine has a number of existing parks with sports field that have been unmaintained. The renovations to Joan MacQueen Middle School's facilities are going before the Board of Supervisors for final approval at their November meeting. These facilities are redundant to much of the County park.
- Impacts to Wright's Field. If the project depends on more people using trails, and they did not analyze the biological impacts of wider and more trails, and overflow into Wright's Field, then they have significant, unmitigated impacts and the DEIR should not be approved.

Finally, fight for the park you want, not for the status quo of no park. A small, nature-based park is what the majority of the Alpine community has been asking for. The chances of no park being built at all are unlikely, so present points on why the proposed park is not the right option.

As for the format of the letter, see the next page. Lines to be filled in are set off in brackets, [like this, and should be removed from your final letter].

[Your Mailing Address]

[DATE. They have to receive your email by 5 PM, November 15, 2021]

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RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Prowant,

Thank you for the opportunity to comment on the Alpine Park Project’s (“Project”) Draft Environmental Impact Report (DEIR). [That trick with the use of DEIR is to make your life easier so that you do not have to type out Draft Environmental Impact Report each time or find colorful and confusing synonyms for it. Introduce yourself in the rest of the paragraph. They need to know what you are an expert on, even if it is living in Alpine for 30 years. Do this with every repeated phrase. Also, unless you are an authorized spokesperson for a group, do not say you are speaking for a group.]

[Write a paragraph about what alternative you prefer, and why. If you prefer the alternative supported by Preserve Alpine’s Heritage, say *in your own words* that you want a nature-based passive park and that you are very disappointed that this alternative was not analyzed as an alternative. You want them to produce a Final DEIR that contains this option and to take all of these options to the Board of Supervisors so that they can choose a park that the community wants. If you submitted a comment letter that is in Appendix B, note the page number and ask why they didn’t consider your input.]

[Summarize the other issues you found. This is the thesis paragraph for the rest of the letter]

[Problem one, phrased Jeopardy style]

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[Last problem, phrased Jeopardy style]

[Parting paragraph. If you found unmitigated impacts, tell them to fix them in the Final EIR.]

[If you like, you can move the discussion of the alternative from the second paragraph to the second to the last]

[Closing paragraph that includes the following elements. Thank them for taking your input. Tell them you want to receive all notices relating to this project at youremail@host.com.]

Sincerely,
[YOUR SIGNATURE BLOCK, or put /S/]
[Your name]