

August 8, 2005

Mr. Mike Kelly
Chairperson
Black Mountain Open Space Park Citizens Advisory Committee

SUBJECT: **RESPONSE TO COMMENTS ON THE DRAFT *BLACK MOUNTAIN OPEN SPACE PARK NATURAL RESOURCE MANAGEMENT PLAN***

Dear Mr. Kelly:

Thank you very much for taking time to review and comment the draft *Black Mountain Open Space Park Natural Resource Management Plan*. The council's suggestions were very thorough and helpful in the process of revising the document.

Included with this letter are a copy of your original comment letter and a revised copy of the management plan. The following point by point response summary is also provided for your reference in reviewing the changes. Please note that the document was also revised in response the City of San Diego Park and Recreation staff comments, so some of the document format has been changed slightly. In the responses below, we have included the location of CAC revisions within the revised document.

This final draft will now be forwarded to the City's Park and Recreation Department, which will take the plan forward for City Council approval along with several other management plans.

Responses to Lori Charett's comments:

1. Additional birds from the Black Mountain Open Space Park Bird Observations were added to Appendix A under the Animals section, Class AVES (Birds).
2. Revisions made on pages 9 and 11 per comment.
3. A *blue-line* stream is one which flows for most or all of the year and is marked on topographic maps with a solid blue line.
4. Throughout the Plan "preserve" was changed to "Park".
5. Revisions made on pages 44 and 45 per comment.
6. Revision made on page 102 per comment.

Responses to Dave Wenk's comments:

1. Regarding the trails: the trails are approved, and there are many other trails on-site.
2. As required by the CWA's Biological Opinion (1-6-97-F-13) with USFWS under which the land was acquired/preserved, the existing unauthorized trails may remain but no new clearing of habitat may occur in this area.

3. Comment regarding access is noted.
4. With regard to mountain biker speed limits, the suggested correction was incorporated on page 76 to say "Mountain bikers must maintain a safe speed at all times".
5. The San Diego Municipal Code §63.0201 states "Any person who on any park, beach or other property owned or maintained by the City of San Diego conducts in any soaring or gliding activity...without first obtaining a permit from the City, or whose permit has been revoked or suspended is guilty of a misdemeanor." As this code was passed by the City Council, any changes to it would require a code amendment by the council, thus changes to the code are beyond the purview of the Natural Resource Management Plan.

Response to Dave Wenk's comments from March 28, 2004.

1. Because the majority of the Montana Mirador property was purchased by the County Water Authority (CWA) to mitigate impacts to the California gnatcatcher, this area has only recently become part of Black Mountain Park. Thus, no current trails within this area are formally authorized. Any trails within this area would require coordination with the USFWS pursuant to CWA's Biological Opinion for gnatcatcher impacts.
2. Because existing trails are unauthorized they should be closed. Park and Rec is working on a Citywide trails plan, and all trail planning for the site will be done through that effort.
3. Revised to say "...Carmel Mountain Road to the south and east."
4. Revised to say "...Carmel Mountain Road to the south and east."
5. The Park and Recreation Department is currently mapping all city trails and trail planning will be done through their Trails Plan.
6. Private land is not accessible to the public.
7. Comment noted. The distinction of CWA mitigation lands is on Figure 11.
8. Mountain biking was added with the other moderate-impact activities.
9. Revised per comment to say "a trail system".
10. Deleted users suggested in parenthesis.
11. The Black Mountain Master Plan has not been updated.
12. The shades of gray look the same. It is possible the copy was unclear.
13. Management Area 3 was revised to say "...numerous unauthorized trails..."
14. "Hiking" was deleted from statement per comment.
15. Section on water bars revised.
16. Comment noted. Trail construction is being pursued by Rick Thompson in the Park and Recreation Department.
17. Comment noted.
18. Revised to state "Create a trail system...", other comments were also added.
19. The section on logos only applies to those signs which identify the park. Other interpretive signs can include additional logos.
20. Friends Groups is now a subheading under Community Group, and the statement was revised to state "Specific examples...included, but are not limited to:"
21. Task added under Priority 2 list per comment.
22. The purpose of the photos is not to show the boundaries of the park, but to provide a sense of the landscape.

Response to Mike Kelly's comments, [General Recommendations]:

1. Comment noted regarding maps. Please note that Park boundaries were received from the Park and Recreation department and only the County mitigation portion of Montana Mirador are shown on maps.
2. Guidelines are provided. Management Plan was never meant to be comprehensive, but sentence was added in Chapter 10: "A detailed plan should be prepared in conformance with these guidelines for any restoration projects proposed in the Park."
3. 10 F has been revised to state "Invasive Species Control Program", and calls for a restoration plan.
4. A Fire Management Plan needs to be developed but is separate from this plan. This plan calls for a Fire Management Plan.
5. Comment on native grasslands noted.

Response to Mike Kelly's comments [Specific corrections, suggestions, or comments]:

1. Sentence revised to delete reference to Park being east of Rancho Penasquitos.
2. Community name corrected.
3. Revision made for Park's location with regard to the City.
4. Revision made to state "When additional properties are added...", instead of "if".
5. Revised to state "Capital Improvement Program", instead of CIP.
6. Revised to state that "The Park includes Black Mountain Peak and..."
7. Comment on grasslands noted.
8. Revised to state "One small patch of freshwater marsh that is an old excavation site..."
9. *Rhus ovata* was deleted from paragraph.
10. Regarding paragraph on native grassland: it is already included on page 16.
11. *Brassica nigra* was added.
12. Western rattlesnake added to discussion.
13. Red-tailed hawks are already discussed as being observed in the Park-no change was made.
14. Statement regarding detection of nocturnal species was deleted.
15. Bird list was revised to include more species.
16. Statement regarding potential bats in mine was deleted. Mountain lion observation was added.
17. Statement regarding San Diego thornmint revised to say "substantial population" instead of individuals.
18. Additional comment added regarding hang gliding and paragliding to say "...however, a permit for such use within the City has been submitted."
19. Comment regarding BMX park noted.
20. Discussion of fires for fuel load reduction was removed. Additional information regarding fire habitats/species was added.
21. Black Mountain Ranch Subarea Plan was revised to state "1,945 acres of resource-based open space".
22. Habitat Restoration and Enhancement was revised to remove *Cortaderia selloana* from the list, as well as the discussion regarding removal of invasive species in on season.
23. Section regarding artichoke thistle was revised per comment.

24. Section regarding Management Area 2 was revised per comment.
25. Section regarding Management Area 3 was revised per comment.
26. Comment noted, although paragraph states “Not every trail...”. No change was made.
27. Guideline 12 was revised per comment. Guideline 13 discusses trails, whereas Guideline 14 discusses public roads/parking lots. Clarification was added. Guideline 16 was resolved per previous email.
28. Park Maintenance Guideline 15 was revised per comment.
29. Park Maintenance Guideline 26 was revised per comment.
30. Park Maintenance Guideline 27 was revised per comment.
31. Fire section was revised. Need for fire management plan was added to section.
32. Comment noted. Equal speeds revised, and “cantering” and “galloping” are listed as prohibited.
33. Section Formation of a Recreational Council was revised to state “Recreational Councils”, and paragraph was revised to reflect this information.
34. Habitat Mitigation, Guideline 7 was deleted.
35. Habitat Mitigation, Guideline 13 was revised removing “jute netting”. Guideline 5 was revised to specify Native American lands.
36. California Exotic Pest Plant Council changed to California Invasive Plant Council.
37. MSCP Specific Management Efforts, Guideline 3 has been revised.
38. Brown-headed Cowbird and Bullfrog Control Program was changed to Invasive Species Control Program and additional revisions made per USFWS comments.
39. Research Opportunities revised to clarify Native American consultation.
40. Noted. Figures given by sources.
41. City of San Diego’s responsibilities revised to include a statement regarding “right of entry” permit needed by the Metropolitan Wastewater departments.
42. The Black Mountain CAC was added under Community Group Responsibilities section.
43. Under the References section, *Checklist of the Vascular Plants of San Diego County, 3rd Edition* (Simpson and Rebman) was added.
44. The following plants were listed in the *Black Mountain Rare Plant Survey* by Dudek and Associates, Inc (2001): *Calochortus splendens*, *Chlorogalum parviflorum*, *Arundo donax*, *Cortaderia selloana*, *Artemisia douglasiana*, *Conyza Canadensis*, *Pluchea odorata*, *Atriplex lentiformis*, *Quercus agrifolia*, *Myoporum laetum*, *Populus fremontii*, *Anemopsis californica*, *Tamarix sp.* Spelling was corrected on *Encelia farinosa* and *Chamaebatia australis*; *Datura wrightii* is not referred to as non-native. *Pseudacris cadaverina* and *Lepus californicus* were removed. Bobcat, Mountain Lion and Mule Deer were added.
45. One known location of *Viguiera laciniata* is in the Western portion of the Park based on Dudek and Associates, Inc *Black Mountain Rare Plant Survey* (2001). *Convolvulus simulans* has been replaced with *Calystegia macrostegia*. Additional plants were added under Native Grasslands and Chaparral per comments. Plant species were removed/relocated per comments.

Response to Mike Kelly’s comments[Email comments]

1. There are a number of plant species we have that the consultant didn't (and vice versa). Two of them are important. They are:

Piperia unalascensis or *Slenderspire piperia*. It's an uncommon, but not rare, orchid. One found it blooming one year out of 4. Other years the plant was eaten and never allowed to bloom!

Chamaebatia australis San Diego Mountain Misery. This shrub is important because this represents a range extension for the species. Farthest north it's been identified.

Attached is a tab separated list of what I have in my database by species; I'll send a second tab separated list by order/family/species etc.

Response to Jas Arnold's comments:

1. Typos removed on pages 57 and 73.
2. Additional information regarding wheelchair accessible designations has been added to page 58 per comment.
3. Additional information regarding wheelchair accessible designations has been added to page 67 per comment.
4. Additional information regarding wheelchair accessible designations has been added to page 68 per comment.
5. Additional information regarding wheelchair accessible designations has been added to page 69 per comment.
6. Additional information regarding wheelchair accessible designations has been added to page 69 per comment.
7. Additional information regarding wheelchair accessible designations has been added to page 74 per comment.
8. Additional information regarding wheelchair accessible designations has been added to page 75 per comment.
9. Additional information regarding wheelchairs has been added to page 76 per comment.

Response to Victor and Lori McBride's comments:

1. Reference to north slope was deleted from paragraph.
2. Mountain lion has been added to animal list.
3. The regulations regarding hang gliders and paragliders is under San Diego Municipal Code, §63.0201, and states "Any person who on any park, beach or other property owned or maintained by the City of San Diego conducts in any soaring or gliding activity...without first obtaining a permit from the City, or whose permit has been revoked or suspended is guilty of a misdemeanor." Therefore, this is beyond the purview of the Natural Resource Management Plan. A sentence was added to Land Use and Recreation, paragraph 3 to state: "Paragliding and hang gliding uses are low impact and have been established on this property for many years."
4. Regarding hang gliding and paragliding permits, the statement has been revised to state "This use is currently not authorized by the City of San Diego; however, a permit for such use within the City has been submitted."
5. Refer to response to comment #3.

Response to Walter White's comments:

1. Sentence added to Land Use and Recreation, paragraph 3 to state: "Paragliding and hang gliding uses are low impact and have been established on this property for many years."
2. The San Diego Municipal Code §63.0201 states "Any person who on any park, beach or other property owned or maintained by the City of San Diego conducts in any soaring or gliding activity...without first obtaining a permit from the City, or whose permit has been revoked or suspended is guilty of a misdemeanor." As this code was passed by the City Council, any changes to it would require a code amendment by the council, thus changes to the code are beyond the purview of the Natural Resource Management Plan.

Response to Rick Thompson's (City Park and Recreation) comments:

1. The section on water bars was revised per Trail Tread Construction & Maintenance document.
2. "Notify Park staff" was added to guideline 10.
3. Under Recreational Use Guideline 7, statement was added "...and provide reasonable linkage to other trails, loop trails and view points".
4. "Clean up after pets" was added to Public Use Guideline 4.

Thank you again for your assistance with the *Black Mountain Open Space Park Natural Resource Management Plan*. Please don't hesitate to contact me at (619) 533-6300 if you have any questions about the document.

Sincerely,
Melanie Johnson Rocks
MSCP Biologist

Cc: Mary Putnam, San Diego County Water Authority
Erin Riley, EDAW Inc. (Consultant to County Water Authority)

Enclosures: (1) U.S. Fish and Wildlife Service and California Department of Fish and Game joint letter, *Comments on the draft Black Mountain Open Space Park Natural Resource Management Plan, in the City of San Diego, San Diego County, California* dated December 19, 2002 (FWS-SDG-1432.10)
(2) Revised Draft *Black Mountain Open Space Park Natural Resource Management Plan*