



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: April 2, 2014

**NOTICE OF PREPARATION (NOP) OF A
DRAFT ENVIRONMENTAL IMPACT REPORT AND
SCOPING MEETING NOTICE
WBS No.: S-01014.02.06**

The CITY OF SAN DIEGO (City) as the Lead Agency under the California Environmental Quality Act (CEQA) has determined that preparation of a Program Environmental Impact Report (PEIR) will be required for the **MISSION TRAILS REGIONAL PARK (MTRP) MASTER PLAN UPDATE (MPU) AND NATURAL RESOURCES MANAGEMENT PLAN (NRMP)**, as further described below.

This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego web-site at the location noted below and distributed on **April 2, 2014**.

City website: <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>

NOTICE OF PREPARATION (NOP) COMMENT PERIOD: Written comments from responsible and trustee agencies, the public, and interested parties on the scope and content of the draft EIR must be received by the Development Services Department no later than **30 days** after receipt of this notice (**April 2, 2014**). Please send your written comments to the following address: **Myra Herrmann, Senior Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or **submit via e-mail your comments to DSDEAS@sandiego.gov referencing the Project Name and Project Number in the subject line.** A draft Program EIR incorporating public input will then be prepared and distributed for public review and comment in accordance with CEQA.

RESPONSIBLE AND TRUSTEE AGENCY: Pursuant to CEQA Section 15082(b), the City requests your input on the scope and content of the environmental information pertaining to your agency's statutory responsibilities in connection with this project. Your agency may need to use this EIR prepared by our agency when considering any permit or other approval for the project.

Documents related to the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) are available for public review at the City of San Diego Development Services Center, 1222 First Avenue, San Diego, CA 92101, and can be found on the following City website:

<http://www.sandiego.gov/planning/programs/parkplanning/index.shtml>

SCOPING MEETING: In accordance with CEQA Section 21083.9, a public scoping meeting will be held by the City of San Diego's Development Services Department on Thursday, April 17, 2014 at 6:00 p.m. running no later than 8:30pm in order to gather comments relating to the proposed Mission Trails Regional Park Master Plan Update and Natural Resource Management Plan scope. The meeting will be held at the Mission Trails Regional Park Visitor and Interpretive Center, located at One Father Junipero Serra Trail, San Diego, CA 92119.

General Project Information:

- Project No. **349988**, SCH No. **PENDING**
- Community Plan Areas: **TIERRASANTA, NAVAJO, EAST ELLIOT, RANCHO ENCANTADA**
- Council Districts: **5 & 7**
- Applicant:
CITY OF SAN DIEGO - PLANNING, NEIGHBORHOODS & ECONOMIC DEVELOPMENT DEPARTMENT

Subject: MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE AND NATURAL RESOURCES

MANAGEMENT PLAN. CITY COUNCIL APPROVAL (Process 5) of the Mission Trails Regional Park (MTRP) Master Plan Update (Master Plan) and associated Natural Resource Management Plan (NRMP)(Figure 1). The project site is within the neighborhoods of Rancho Encantada, Scripps Ranch, Tierrasanta, San Carlos, Lake Murray and Del Cerro and within the Rancho Encantada, East Elliott, Tierrasanta, and Navajo Community Plan Areas of the City of San Diego and will require Community Plan technical amendments for Navajo, Tierrasanta, East Elliot and the Rancho Encantada Precise Plan (Figures 2-7). The project can be separated into the five (5) following areas: the current 5,242 acre Mission Trails Regional Park area, a 1,377 acre portion south of Scripps Poway Parkway and to the west of Sycamore Canyon Open Space Preserve, a 2,697 acre area north of State Route 52 and west of Santee Lakes, a 142 acre area north of State Route 52 and the north of the northwestern corner of the existing Mission Trails Regional Park, and lastly, south of the current park a 378 acre series of open spaces surrounding Lake Murray. In 2010, the City of San Diego initiated a project to update the 1985 Mission Trails Regional Park (MTRP) Master Plan, develop a Natural Resources Management Plan (NRMP).

The purpose for the Master Plan Update (MPU) is multi-faceted and includes the following:

- 1) Fully incorporate the resource protection and management requirements of the Multiple Species Conservation Program (MSCP) into an NRMP for MTRP and coordinate the recommendations and management actions between the MPU and NRMP;
- 2) Incorporate within the MTRP boundaries and provide master planning for the management of resources and the development of recreational opportunities within lands acquired for preservation in the East Elliott community plan area, while continuing to provide for potential private development per the current Community Plan and MSCP guidelines;
- 3) Incorporate within the MTRP boundaries the MSCP preserve lands created as part of the Rancho Encantada Precise Plan in order to provide consistent centralized natural resource and recreation management;
- 4) Update the planning recommendations in the 1985 Master Plan for MTRP based on the public's recreational desires, planning overlays, policies and regulations.

TECHNICAL AMENDMENTS TO COMMUNITY PLANS

The MTRP MPU is anticipated to require amendments to the Navajo, Tierrasanta and East Elliot Community Plans and the Rancho Encantada Precise Plan to ensure that policy recommendations with regards to the management of MTRP are consistent with updated policies in the Master Plan. Pursuant to General Plan, Land Use Element Policy LU-D.6, a Technical Amendment may be processed to update or correct maps and community plan language needed as part of the MTRP MPU.

ALTERNATIVES: Preparation of the DEIR will include an analysis of a reasonable range of alternatives which avoid or mitigate the plan update's significant environmental impacts. These alternatives will be identified and discussed in detail, and address all significant impacts. The alternative's analysis will be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis will be a section entitled "Alternatives Considered but Rejected." This section will include a discussion of preliminary alternatives that were considered but not analyzed in detail and the reason for rejection should be explained. The following two alternatives will be considered in the Program EIR:

A. THE NO PROJECT ALTERNATIVE

This alternative will analyze a continuation of the existing conditions within MTRP at the time the NOP is published, and what would be reasonably expected to occur in the foreseeable future if the Project were not approved (current Master Plan but no NRMP) with the existing community plans. This alternative will compare the projected impacts of the change that would result from Project approval against impacts that would occur under the existing Master Plan. Should the No Project Alternative prove to be the environmentally preferred alternative, then CEQA requires that another environmentally preferred alternative be identified for the Project.

B. REDUCED PROJECT ALTERNATIVE

This alternative would analyze implementing a MPU/NRMP with similar but reduced uses than the draft MPU/NRMP. This alternative may or may not include community plan technical amendments, depending upon where the plan area modifications occur. As with the proposed Project, this alternative would be fully consistent with the Environmentally Sensitive Lands Regulations (ESL) including encroachment allowances permitted for steep slopes, wetlands, and sensitive biology, and consistent with the Historical Resources Regulations for archaeological sites, without the need for deviations or variances in order for park projects to be implemented in the future. This alternative will consider the impacts of a reduced project which includes a land use plan and policies that reduce significant impacts for the same issue areas as analyzed for the Project at a programmatic level and should not be developed to reduce or avoid impacts of a specific project or project level concerns.

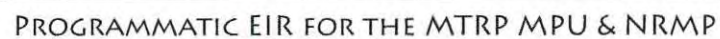
Recommended Finding: The recommended finding that the project may have significant effect on the environment is based on an Initial Study which identified potential significant environmental impacts in the following areas: *Land Use (including MSCP/MHPA, ESL and Historical Resources Regulations), Biological Resources, Transportation/Circulation and Parking, Visual Affects/Neighborhood Character, Noise, Historical Resources, Hydrology/Water Quality, Geology/Soils, Paleontological Resources, Public Services, Human Health/Public Safety, Air Quality/Odor, Greenhouse Gas Emissions, and Public Utilities.*

Availability in Alternative Format: To request this Notice, the Scoping Letter, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE). **Additional Information:** The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. Contact Senior Planner, Myra Herrmann at (619) 446-5372 or via email at mherrmann@sanidiego.gov for any information regarding the environmental review of this project. For information regarding public meetings/hearings on this project, contact Project Manager Jeff Harkness at (619) 533-6595 or via email at jharkness@sanidiego.gov.

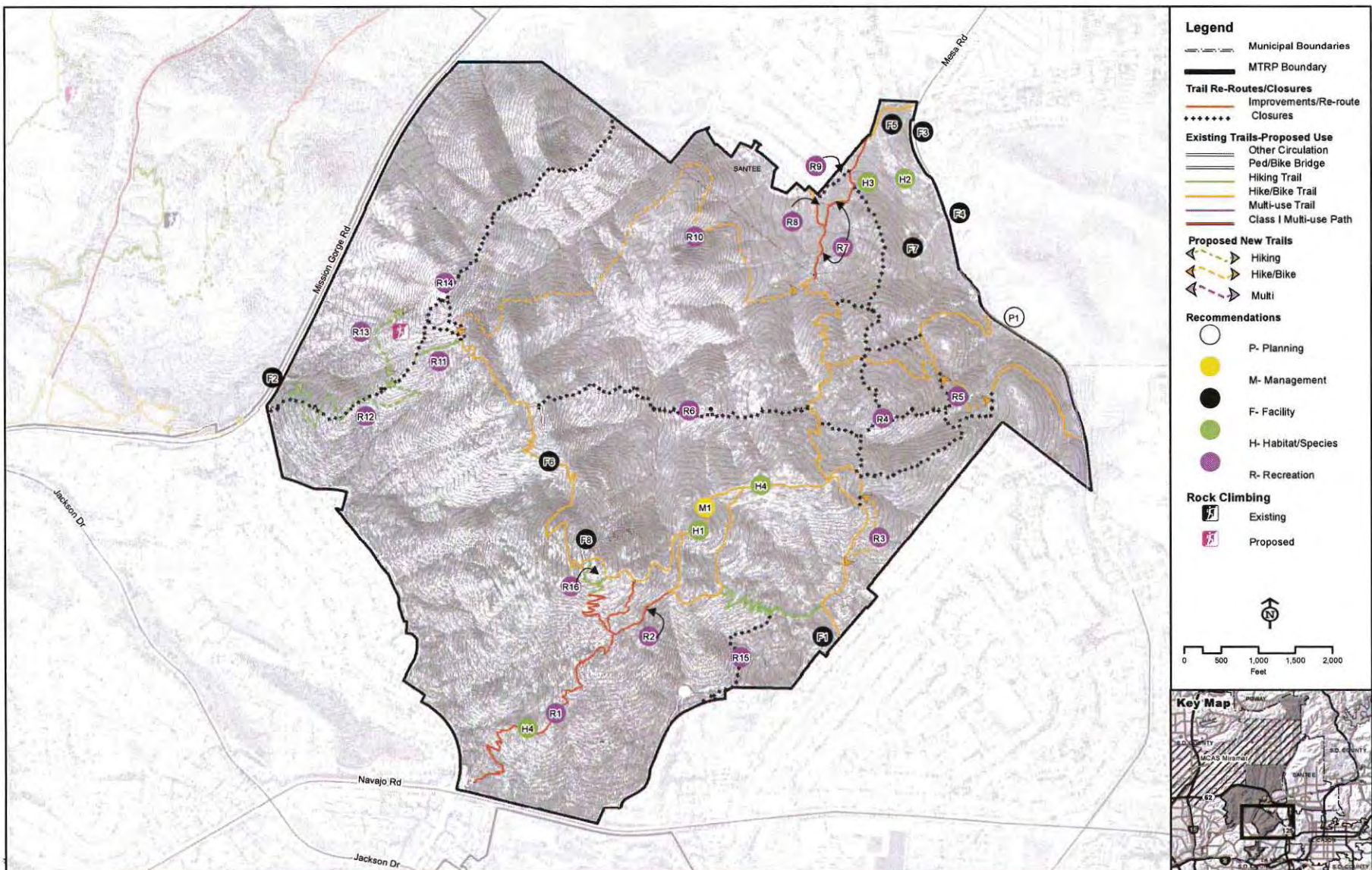
Cathy Winterrowd
Deputy Director
Planning, Neighborhoods & Economic Development

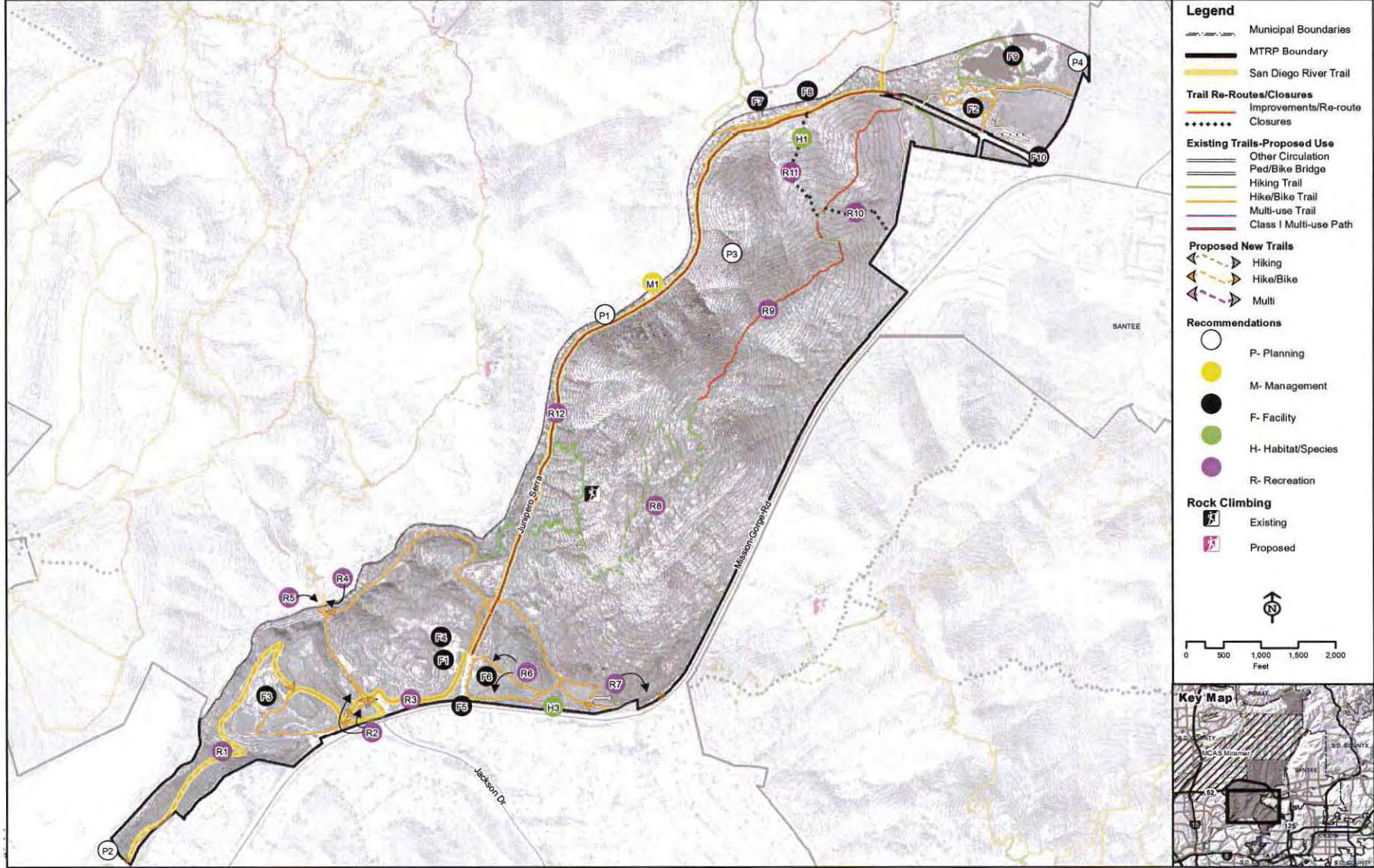
Attachments: **FIGURE 1:** Proposed Boundaries of Mission Trails Regional Park
FIGURES 2-7: Plan Areas within Mission Trails Regional Park
Scoping Letter

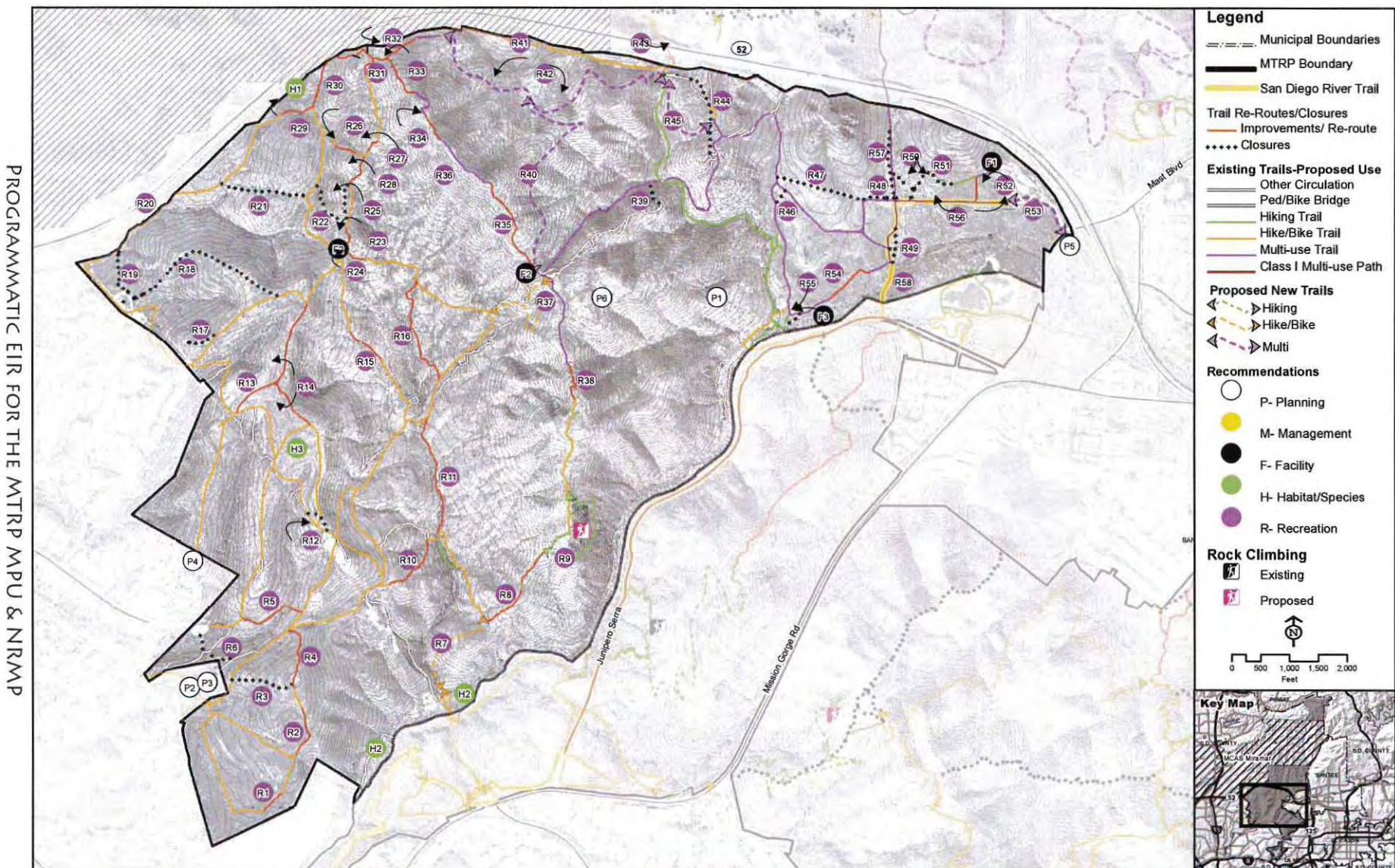
Distribution: **SEE ATTACHED**

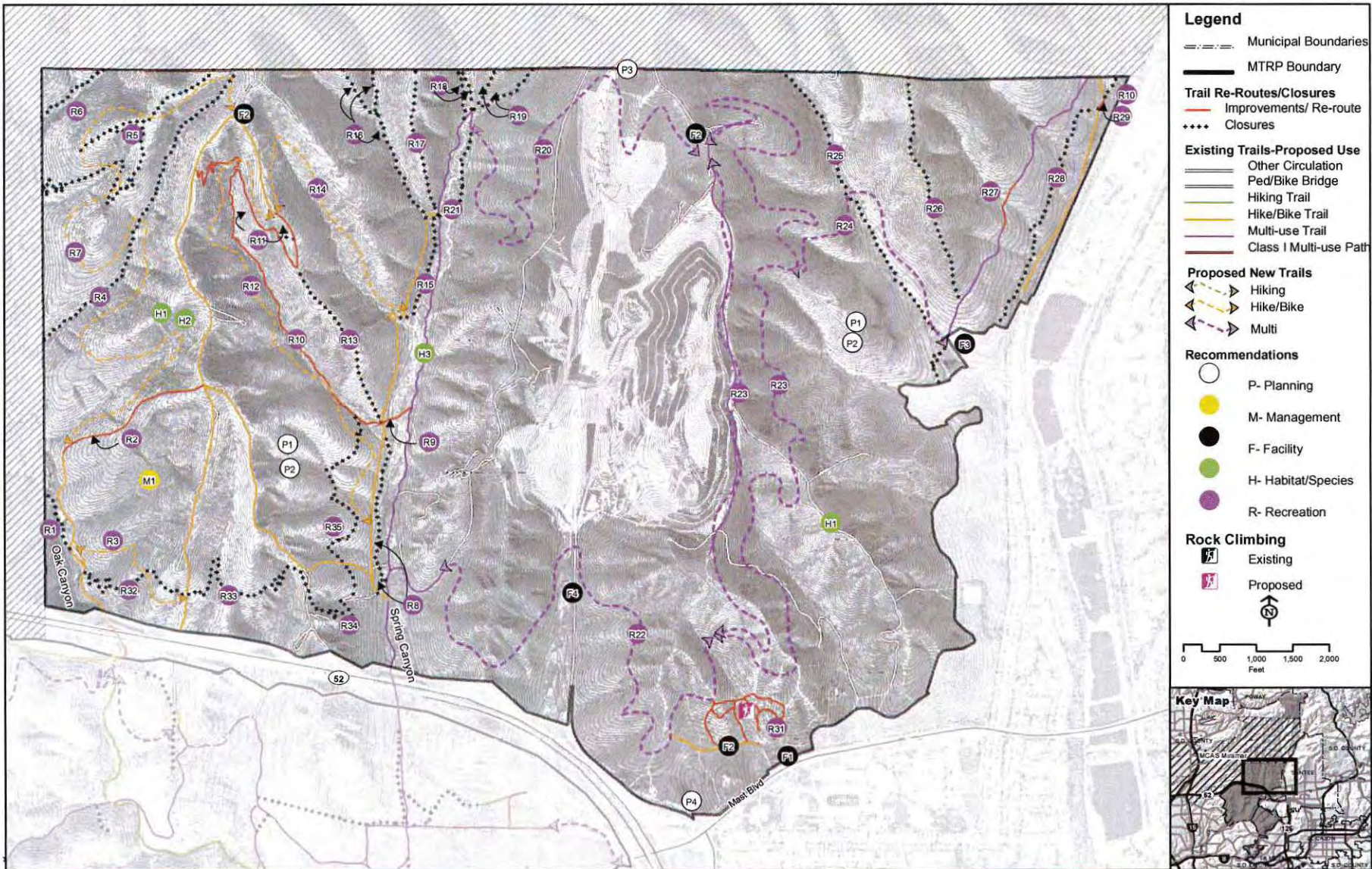


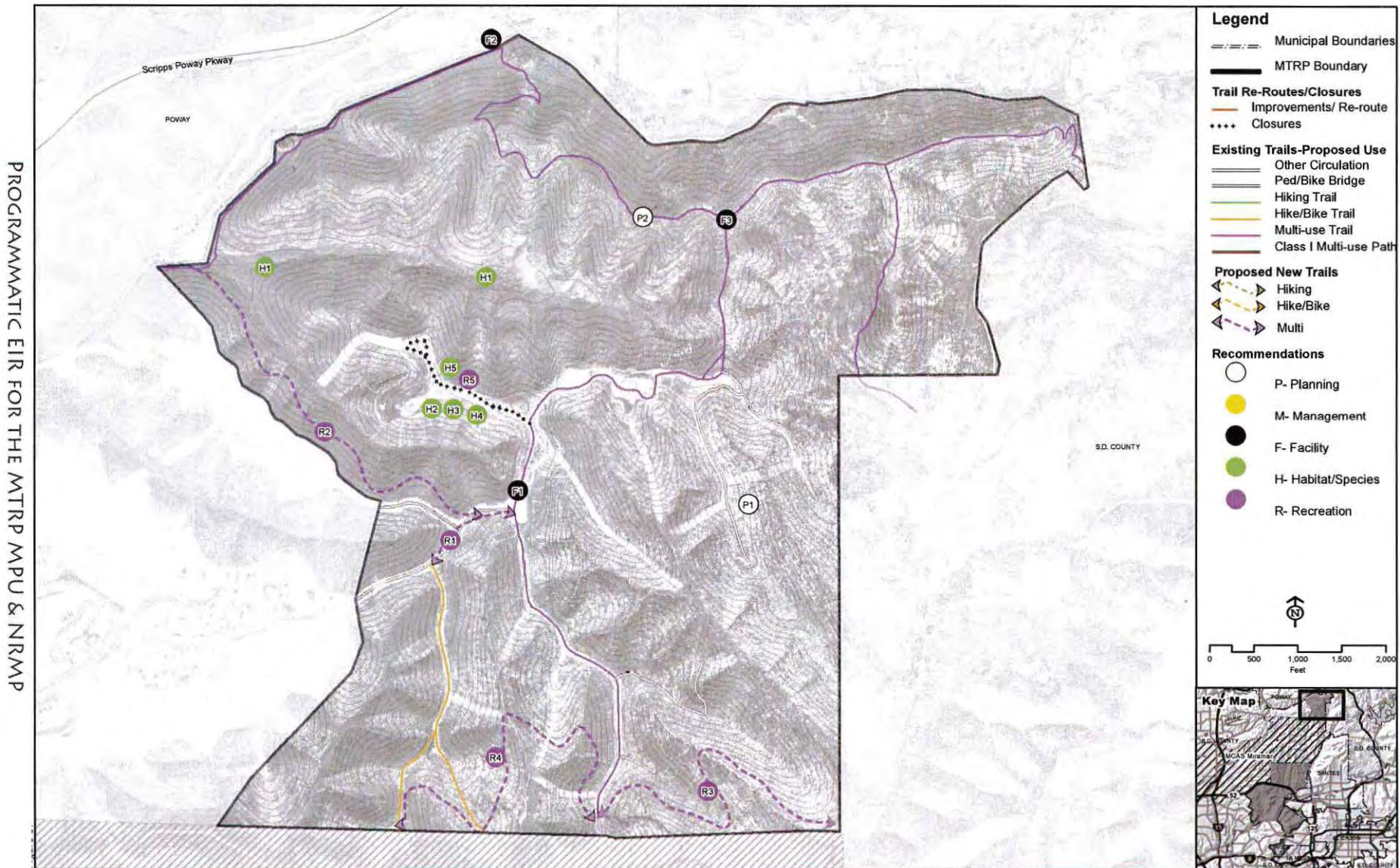












NOTICE OF PREPARATION PUBLIC REVIEW DISTRIBUTION:

U.S. Government

Naval Facilities Southwest - Environmental Planning Division Naval Facilities (12)
Army Corps of Engineers (26)
Environmental Protection Agency (19)
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 Jamul Indian Village (225E)
 La Posta Band of Mission Indians (225F)
 Manzanita Band of Mission Indians (225G)
 Sycuan Band of the Kumeyaay Nation (225H)
 Viejas Band of Mission Indians (225I)
 Mesa Grande Band of Mission Indians (225J)
 San Pasqual Band of Mission Indians (225K)
 Ipai Nation of Santa Ysabel (225L)
 La Jolla Band of Mission Indians (225M)
 Pala Band of Mission Indians (225N)
 Pauma Band of Mission Indians (225O)

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THE CITY OF SAN DIEGO

April 2, 2014

SUBJECT: Scope of Work for Draft Program Environmental Impact Report for the Mission Trails Regional Park Master Plan Update and Natural Resources Management Plan ("Project"). Project No. 349988/SCH No. *Pending*

Based on the review of the project application and pursuant to the California Environmental Quality Act (CEQA) of 1970, Sections 15060(d) and 15081, as amended, it has been determined by the Environmental Analysis Section (EAS) of the City of San Diego Development Services Department that the Project may have a significant effect on the environment and preparation of an Environmental Impact Report (EIR) is required. City Council approval (Process 5) is required for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) Project, which includes Technical Amendments to the Tierrasanta, Navajo, and East Elliot Community Plans, and the Rancho Encantada Precise Plan.

The purpose of this Scoping Letter is to identify specific issues to be addressed in the EIR and shall be prepared in accordance with the City of San Diego *Environmental Impact Report Guidelines (updated December 2005)* and *California Environmental Quality Act - Significance Determination Thresholds prepared by the Development Services Department (January 2011)*. A Notice of Preparation (NOP) is being distributed concurrently to Trustee and Responsible Agencies and others who may have an interest in the project in accordance with CEQA Section 21083.9(a)(2) for projects of statewide, regional, or area-wide environmental impacts. **A Scoping Meeting has been scheduled for Thursday, April 17, 2014.** Changes or additions to the scope of work may be required as a result of input received in response to the Scoping Meeting and NOP. Furthermore, should the project scope be modified during the scoping or EIR review process and/or by the applicant, these changes shall be disclosed in the EIR under the section "History of Project Changes."

Each section and issue area of the EIR shall provide a descriptive analysis of the project followed by a comprehensive evaluation. The EIR shall also include sufficient graphics and tables to provide a complete and meaningful description of all major project features.

PROJECT DESCRIPTION

CITY COUNCIL APPROVAL (Process 5) of the Mission Trails Regional Park (MTRP) Master Plan Update (Master Plan), Natural Resource Management Plan (NRMP) and associated community plan technical amendments. In 2010, the City of San Diego initiated a project to update the 1985 MTRP Master Plan, develop a NRMP, and process a Programmatic Environmental Impact Report (PEIR) to cover the activities identified in both.

PROJECT LOCATION

Currently, MTRP is about 5,800 acres of land between Interstate 8 to the south and State Route 52 (SR-52) to the north. The existing park is split into four planning areas: Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain as shown in Figure 1. Surrounding MTRP is the City of San Diego Community Planning Areas of Tierrasanta to the west, Navajo to the south, and East Elliott to the north. MCAS Miramar also occurs north of SR 52. The Cities of Santee, El Cajon and La Mesa are along various portions of the eastern boundary.

The East Elliott area will add approximately 2,500 acres to MTRP. This includes almost the entire East Elliott community plan area, excluding private land currently being processed for residential development along its eastern edge (see Figure 1). Active land management and monitoring activities will only occur on publicly owned lands or privately held lands with a conservation easement.

The West Sycamore area will add approximately 1,300 acres to MTRP. This area is the eastern half of the Rancho Encantada Precise plan area which abuts MCAS Miramar to the south, the City of Poway to the north, and the County of San Diego to the east (see Figure 1).

GENERAL BACKGROUND AND PROJECT HISTORY

The origin of MTRP dates back to 1960 when the concept of a 1,765 acre "Fortuna Mountain-Mission Gorge Metropolitan Park" was proposed by the City of San Diego. Over the next 16 years various park development plans were conceptualized. When the County of San Diego acquired Cowles Mountain, a City-County joint regional park planning process managed by a multi-agency Task Force was initiated. In 1976, a proposed Master Development Plan was prepared for the "Lake Murray/Cowles Mountain/Fortuna Mountain Regional Park" and a Citizens Advisory Committee (CAC) was formed in 1977. In 1979, the EIR was certified, (the 1976 Master Development Plan approved?) and the park was renamed Mission Trails Regional Park. Between 1979 and 1981, the Task Force and CAC assessed and modified the 1976 Master Development Plan based in part on information contained within the EIR. In 1984, the CAC and Task Force amendments were incorporated into a revised Master Development Plan which was subsequently approved by the CAC, Task Force, City Council and Board of Supervisors in 1985.

In 1997 the Multiple Species Conservation Program (MSCP) was approved. This placed a vast majority of MTRP within the Multiple Habitat Planning Area (MHPA) which has management Guidelines adopted by the City of San Diego. With the additional emphasis on resource management and protection placed on MTRP lands, some of the uses originally planned within the park were moved to alternative, less environmentally sensitive sites or dropped from

consideration completely. The MSCP also identified two other pertinent areas as MHPA's: the vast majority of the East Elliott Community Plan Area and a large block of open space contained within the Rancho Encantada Precise Plan, both of which are being incorporated into MTRP upon their acquisition for conservation or mitigation purposes.

Since 1985, most of the major development elements identified in the Master Development Plan (Master Plan) have been implemented, such as the Lake Murray Reservoir Rehabilitation, Old Mission Dam staging area, Cowles Mountain staging area, Lake Murray Community Park, Visitor and Interpretive Center, Old Mission Dam Interpretive Pathway and Viewing Terrace, Clairemont Mesa Staging Area, Kumeyaay Lake Campground, and Equestrian Staging Area at the end of Mast Blvd.

MASTER PLAN UPDATE PROCESS

In 2007, an ad hoc subcommittee of the CAC began a process of reviewing and updating the 1985 Master Plan to address alternative project locations, additional projects, and the two expansion areas. To implement Council Policy 600-33 *Community Notification and Input for City-Wide Park Development Projects*, and to address the MSCP requirement for development of a NRMP for MTRP, in November 2010, the City of San Diego, City Planning and Community Investment (CPCI) Department began the process to update the MTRP Master Plan, develop a Natural Resources Management Plan and prepare a Programmatic EIR.

On January 27, 2011, the first of three public workshops focusing primarily on the MPU was held at the MTRP Visitor Center. A focal point of the public's input was four large aerial photograph exhibits of the park where participants could use pre-defined icons, post-it notes, and provide their input regarding issues and opportunities directly on the maps. Nearly 200 comments were received from the 83 participants. An expanded and more sustainable recreational trail system was the most frequently requested item. Following the workshop, draft alternatives were developed over the next two months for presentation at the second public workshop.

On March 31, 2011 the second public workshop was held at the MTRP Visitor Center where the 58 participants were asked to vote their level of support for each project element, as well as identify their top 10 priorities for implementation. A number of participants requested more time to assess the various project elements before casting their votes. This request was addressed by setting up a web survey to allow individuals an opportunity to vote and provide additional written comments. The web survey ran for two weeks, in which time 75 individuals participated. In total, 101 voting ballots were cast for use in identifying the public's issues and priorities. Following the workshop and web survey, the voting ballots were processed. Over the next month and a half, trail system alternatives were reviewed with City staff for conflicts with sensitive resources and a preferred alternative was developed for presentation at the final public workshop.

On June 9, 2011, the final public workshop was held at the MTRP Visitor Center where the 53 participants were given an opportunity to ask questions, voice concerns, and provide written comments.

With the final phase of the MPU process, working drafts (spring/summer 2012) and pre-public drafts (spring 2013) of both plans were released to various City departments, San Diego County Water Authority (SDCWA), San Diego Gas & Electric (SDG&E), Marine Corps Air Station (MCAS) Miramar, US Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW), and subsequent sites visits to various portions of MTRP with USFWS & CDFW were conducted in late summer 2013. Comments received during this two (2) year process have been incorporated where appropriate into the draft MPU and NRMP released for public review as part of the CEQA NOP public review process.

MASTER PLAN CONTENT

The purpose for the MPU is multi-faceted:

- 1) Fully incorporate the resource protection and management requirements of the Multiple Species Conservation Program (MSCP) into an NRMP for MTRP and coordinate the recommendations and management actions between the MPU and NRMP;
- 2) Incorporate within the MTRP boundaries and provide master planning for the management of resources and the development of recreational opportunities within lands acquired for preservation in the East Elliott community plan area, while continuing to provide for potential private development per the current Community Plan and MSCP guidelines;
- 3) Incorporate within the MTRP boundaries the MSCP preserve lands created as part of the Rancho Encantada Specific Plan in order to provide consistent centralized natural resource and recreation management;
- 4) Update the planning recommendations in the 1985 Master Plan for MTRP based on the public's recreational desires, planning overlays, policies and regulations.

The MTRP MPU/NRMP is a policy document that establishes the planning framework for the future design, implementation, and management of the Park. The Goals and Policies in the MPU provide specific guidance on critical park implementation issues, so that all aspects of development and operation will be consistent with the agreed upon park concept.

The objectives of the MTRP MPU/NRMP are to:

1. Define the Park's setting in terms of physical environment, aesthetics, public plans and policies, surrounding land use and ownership;
2. Identify recreational and other open space potentials within the Park setting;
3. Assess existing and potential relationships (especially edges, roads, and trail linkages) between the Park, its immediate surroundings, and the San Diego region as a whole; and

4. Maintain and update a comprehensive Master Plan in terms of park uses, facility sizes and locations, environmental and architectural design concepts, and strategies to avoid or minimize environmental impacts.

Major concepts of the 1985 planning process that continue to be important today are:

1. Multi-purpose role – the Park serves a comprehensive mix of the educational, environmental, recreational and cultural needs of the San Diego Region. It accommodates active as well as passive uses on both a regional and community level.
2. Trail and Open Space Linkages – the Park orients outward to the region; and is not viewed as an ‘island.’ Because its location, potential size, and aesthetic environment make it a logical destination for hikers, bicyclists, and equestrians, the Park relates to major trail linkages with other regional parks, open space corridors, and activity centers. Trail corridors should extend outward into existing and future residential areas wherever compatible.
3. Response to Environment - the Park will continue to protect environmental and cultural resources while providing for recreational opportunities.

MTRP shall be designed, implemented and managed to continue to achieve these objectives in a balanced and sustainable manner. As future activities and projects for MTRP are proposed, they will be evaluated for compliance with this Master Plan to ensure that the vision of MTRP is maintained.

While the MTRP MPU guides activities on both private and public land, it does not usurp existing private property rights or disallow existing uses that are permitted under the City’s current zoning and land use ordinances, General Plan, the East Elliott Community Plan, and MSCP guidelines. Any land use changes such as plan amendments or rezones, development, or other activities that require discretionary City approval will be subject to the policies contained in the MPU.

MASTER PLAN PROPOSED DEVELOPMENT

The future development of the MTRP is provided for each of the six planning areas of the Park, and includes hike, bike and equestrian trail alignments, staging areas, rest areas, and other amenities. It also includes proposed interpretive programs and potential mitigation opportunities for the Park.

Lake Murray (see Figure 2)

Lake Murray has historically been the most accessible, developed and highly used area of the Park. The existing developed and water-oriented recreational uses (golf course, ballfields, community park, boat ramp and concessions) will continue to be the primary focus of this area. MPU recommendations include sediment and erosion controls related to the unpaved access roads and parking lots; the implementation of water quality improvement best management practices at major storm drain outfalls to improve water quality within this area prior to

discharge into Alvarado Creek and the San Diego River; the closure or re-routing of unauthorized trails; and addition of a new trail connection to the Del Cerro community.

Lake Murray currently supports about 8 miles of authorized and un-authorized recreational trails. Proposed actions include closing approximately 0.4 miles of trails, re-routing another 0.2 miles of trails, and constructing about 0.5 miles of new trails for an overall increase of about 0.4 miles of trails.

Cowles Mountain (see Figure 3)

Cowles Mountain is a dominant landmark within the San Diego Region rising to a height of 1,591 feet and is the highest point within the City of San Diego. An existing utility/emergency access road to the communications antennae at the top of the Cowles Mountain will remain the only vehicular access within this area. Trails currently originate from the Cowles Mountain staging area, as well as Barker Way, Mesa Road, and Big Rock Road. Additional staging area improvements are proposed at the existing Barker Way and Mesa Road trailheads, and a new small staging area and trailhead is proposed west of Pyles Peak off of Mission Gorge Road. A small bike skills area is proposed for inclusion as part of the Mesa Road staging area improvements. All other proposed improvements are related to recreational trails.

Barker Way is a currently heavily used access point utilizing only on-street parking, trash/recycling receptacles and signage. The proposed staging area would impact up to one acre of land and create an off-street staging area with parking, portable toilets, trash/recycling receptacles, and other related amenities.

Mesa Road currently has two staging areas, one at the end of the road and the other near Big Rock Park. The one at the end of the road is recommended for closure and consolidation with the one near Big Rock Park. Proposed improvements are for the area near Big Rock Park and would utilize the currently disturbed shoulder of the road from Big Rock Park to just past Mesa Heights Road. The site is approximately three quarters of an acre and could support parking, a small bicycle pump-track, beginner to intermediate bike skills features, and other related amenities. Restrooms are provided at the adjacent Big Rock Park.

There is currently no formal access to Pyles Peak from the west, only an unauthorized hiking trail that originates from the residential development along Golf Crest. Approximately 700 feet north of Golf Crest along Mission Gorge Road is a small access road to a San Diego County Water Authority (SDCWA) facility that is proposed for improvements (one third of an acre) to support parking, portable toilets, trash/recycling receptacles, and other related amenities while maintaining access to SDCWA facilities. Vehicular access would be right-in/right-out only from/to Mission Gorge Road.

Cowles Mountain currently supports about 14 miles of authorized and un-authorized recreational trails. Proposed actions include closing approximately 7 miles of trails, re-routing another 2 ½ miles of trails, and constructing about 9 miles of new trails for an overall increase of about 1.7 miles of trails.

Mission Gorge (see Figure 4)

Mission Gorge is the heart of MTRP. It encompasses most of the cultural resources, significant sensitive biological resources, the geologic formations of the gorge, the San Diego River and associated habitats, the Visitor and Interpretive Center, and the Kumeyaay Campground. Annual visits to the Visitor Center continue to increase. To help meet the needs of increased patronage, an additional parking lot near the Visitor Center and improved trail connectivity between the Jackson Drive staging area would alleviate some of the pressure during times of peak use. The inclusion of additional bicycle skills features at the Deerfield BMX site (being renamed the Deerfield Bike Skills area) are recommended, as well as a bridge connection over the San Diego River at the bottom of Jackson Drive. All other proposed improvements are related to recreational trails.

The additional parking lot to support the increased patronage of the Visitor and Interpretive Center and the Park is proposed within the western Oak Grove Loop area. A two and one half acre area is being proposed for assessment to develop about one and one half acres. The expanded footprint is intended to provide some flexibility to avoid potential cultural resources within the area. The developed area is intended to support parking, picnic tables, benches, informational kiosks and other amenities. Relocation of existing picnic tables and signage would be required.

The design and construction of additional bicycle skills features at the Deerfield BMX site is proposed to provide facilities for a full range of skill levels. All proposed improvements will remain within the area that is outside the MSCP/MHPA.

A bridge over the San Diego River at the bottom of Jackson Drive is proposed to improve connectivity between the Mission Gorge and Fortuna Mountain areas of the Park. During a significant portion of the year, water levels within the River prevent most park users from crossing at this area. A decision regarding the style (truss, suspension) and scale (pedestrian, light vehicle) of bridge has not been made.

A segment of the San Diego River Trail, a regional trail running from the Pacific Ocean to the headwaters of the San Diego River, is proposed within MTRP. The proposed alignment is from the southern MTRP boundary to the northeastern boundary, using a combination of new, upgraded, and existing trails. This proposed alignment is consistent with the draft San Diego River Park Master Plan.

Mission Gorge currently supports about 9 miles of authorized and unauthorized recreational trails. Proposed actions include closing about 1.7 miles of trails, re-routing approximately 1.2 miles of trails and constructing nearly 6 miles of new trails for an overall increase of about 4 miles of trails.

Fortuna Mountain (see Figure 5)

Fortuna Mountain is the northern extension of the ridge bisected by the San Diego River and is relatively undeveloped with the exception of two major utility corridors. SDCWA has several

pipelines and access roads traversing the western edge of MTRP in the north/south direction. SDG&E has both gas pipelines electrical distribution lines and access roads traversing MTRP. The gas pipeline traverses the Park in the east/west direction just south of SR-52. There are several electrical distribution corridors that traverse MTRP in a southwesterly/northeasterly direction. Two staging areas and a couple of community trail connections from Tierrasanta serve the Fortuna Mountain area. The Clairemont Mesa Boulevard staging area serves the western edge of Fortuna Mountain, whereas the Equestrian staging area serves the eastern edge of Fortuna Mountain. The Fortuna ridgeline saddle separates the area into East and West Fortuna. Due to the steepness of the utility access road and trails crossing over the ridgeline and saddle, most Park users stay on one side of Fortuna or the other. Proposals within the Fortuna Mountain area are focused on trail system improvements. Minor amenity upgrades are recommended at the staging areas.

Fortuna Mountain currently supports about 29.5 miles of authorized and unauthorized recreational trails, and utility access roads. Proposed actions include closing about 10 miles of trails and roads, re-routing approximately 5 miles of trails and constructing about 5 miles of new trails for an overall increase of about 2.8 miles of trails.

East Elliott (see Figure 6)

East Elliott is one of two areas being added to MTRP. It is approximately 2,500 acres in size and is located due north of the eastern portion of Fortuna Mountain on the north side of SR-52. It is linked to Fortuna Mountain via two freeway overpasses that provides under crossings for wildlife and recreational users. MCAS Miramar borders East Elliott along the entire western and northern perimeters. The Sycamore Canyon Landfill occupies the central portion of the site and is included within the boundaries of the Park to facilitate long-term reclamation of the closed portions of the landfill to open space and recreational uses. The ownership and management of the Landfill has agreed to collaborate with the City to create a recreational linkage along the northern perimeter to connect MTRP with the historic Stowe Trail corridor that runs north/south along the eastern edge of the East Elliott area. A significant portion of this area is currently in private ownership. Inclusion of this area within the MTRP Master Plan does not change the development potential of these properties under MSCP guidelines. If one or more parcels do develop in the future, the City will coordinate with the developers to insure that open space and proposed amenities identified within the MPU are incorporated into MTRP through City fee-ownership, or easements on privately held property. Two SDG&E electrical distribution corridors traverse East Elliott. One north/south corridor is within the western portion of the area, the other splits off along the southern boundary and routes to the northeast along the edge of the landfill. This area also contains the Santee Boulders, identified as a long time rock climbing area used to teach beginner climbers.

East Elliott currently contains a series of utility access roads and several miles of user defined trails. Proposed actions include closing about 13.5 miles of trails, re-routing another 0.25 miles of trails, and constructing an additional 13 miles or so of new trails, including providing

connectivity to the Stowe Trail and the Santee Boulders, where and when ownership/easements allows for an overall increase of about 1 mile of trails.

West Sycamore (see Figure 7)

West Sycamore is the second area being added to MTRP. It is approximately 1,300 acres in size and is located about 3 miles north of East Elliott. It is bordered by the Stonebridge development on the west, Beeler Canyon and Sycamore Canyon Road to the north, the County's Goodan Ranch Sycamore Canyon Preserve to the east and MCAS Miramar on the south. An SDG&E electrical distribution corridor traverses the site from the south west to the north east. The developers of Stonebridge are required to transfer this property to the City of San Diego when certain conditions of their development agreement have been met.

West Sycamore currently contains about 17 miles of recreational trails. Proposed actions include closing about 0.4 miles of unnecessary roads and constructing approximately 3.3 miles of new trails, including a potential segment of the Trans-County Trail. A staging area and potential Ranger's office are the only facilities proposed within West Sycamore and they are to occur within a previously disturbed area outside the MHPA.

NATURAL RESOURCES MANAGEMENT PLAN PROCESS

The NRMP is being developed concurrently with the Master Plan to avoid unnecessary conflicts early on in the alternatives development process. The resulting preferred alternative from the Master Plan process is used as an input for analysis in the NRMP prior to either document being finalized. This approach is facilitating coordination and collaboration on recommended actions between the two plans, as well as providing an opportunity to avoid as many resource protection/recreational use conflicts as possible.

The NRMP is being directed by City staff to ensure compliance with MSCP requirements and consistency with City policy, guidelines and current methodologies regarding resource protection and management.

The draft NRMP is being released as an appendices to the MPU for public review.

TECHNICAL AMENDMENTS TO THE COMMUNITY PLANS

Technical Amendments to the Navajo, Tierrasanta and East Elliot Community Plans and the Rancho Encantada Precise Plan are proposed to update or correct maps and community plan language needed as part of the draft MPU/NRMP, to ensure that policy recommendations with regards to the management of MTRP are consistent with updated policies in the MPU/NRMP.

PROJECTS WITHIN THE SCOPE OF THE PEIR

Another purpose of this or any other PEIR is to streamline environmental review of projects found to fall within the scope of the PEIR. The PEIR for this Project would address the Master Plan recommendations and technical amendments to the Community Plans at a general programmatic level. The PEIR will not evaluate project level impacts associated with future implementation of any of the Master Plan recommendations or any public or private

development projects proposed within MTRP. The PEIR will also not address impacts of specific projects on individual County Assessor's Parcels. Any subsequent activities proposed within MTRP will be reviewed for consistency with the PEIR and draft MPU/NRMP and any project level impacts of these subsequent activities would be subject to separate environmental review in accordance with CEQA.

PEIR FORMAT AND CONTENT

The PEIR serves to inform governmental agencies and the public of a project's environmental impacts. Emphasis on the PEIR must be on identifying feasible solutions to environmental problems. The objective is not simply to describe and document an impact, but to actively create and suggest mitigation measures or project alternatives that would substantially reduce the significant adverse environmental impacts. The adequacy of the PEIR will depend greatly on the thoroughness of this effort. The PEIR must be written in an objective, clear and concise manner. Wherever possible, use graphics to replace extensive word descriptions and to assist in clarification. Support conclusions with quantitative as well as qualitative information. Conclusions must be supported with quantitative, as well as qualitative information to the extent practicable.

Prior to distribution of the Draft EIR (DEIR), Environmental staff will coordinate with the project consultant to prepare Conclusions, which will be attached to the front of the DEIR. The Conclusions cannot be prepared until a DEIR has been submitted and accepted for release by the City. The DEIR shall include a Title Page which includes the Project Number, State Clearinghouse Number (SCH No.) and the date of publication and an Executive Summary, reflecting the DEIR outline for each issue area identified below in Section V, but need not contain every element of the DEIR. Additional information regarding specific content and formatting of the DEIR can be found in the City's *Environmental Impact Report Guidelines (updated December 2005)*.

I. INTRODUCTION

Introduce the proposed project with a brief discussion on the intended use and purpose of the EIR. Describe and/or incorporate by reference any previously certified environmental documents that address the project site. Identify all discretionary City actions associated with the project. If other local, state, or federal agencies have responsibility for approvals or project review, briefly describe this involvement. This section should also describe the basis for how this PEIR will be used for subsequent environmental review of projects implemented in accordance with the MPU and NRMP, once adopted, and/or additional required approvals (if applicable).

II. ENVIRONMENTAL SETTING

The Draft PEIR should (i) describe the precise location of the Project and present it on a detailed topographic map and regional map; (ii) provide a local and regional description of the environmental setting of the project, as well as adjacent land uses, area topography,

drainage characteristics and vegetation; and (iii) include any applicable land use plans/overly zones that affect the Project site, such as the City of San Diego Multiple Planning Area and FEMA 100 year floodway zone.

III. PROJECT DESCRIPTION

The Draft PEIR should include a detailed discussion of the goals and objectives of the proposed project. Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. This section of the document should include a discussion of all discretionary actions required for Project approval and implementation, including but not limited to a description of all permits and approvals required by local, state, federal, and other regulatory agencies.

For the purpose of this analysis the area covered by the Proposed Project includes the current boundaries of the Mission Trails Regional Park, the East Elliot Community Planning Area, and approximately 1,820 acres of the Multiple Habitat Planning Area east of Rancho Encantada, known as the West Sycamore area. The Community Plan amendments resulting from implementation of the draft Mission Trails Regional Park MPU and project features would be also addressed in the PEIR.

Pursuant to the CEQA Guidelines (Section 15168), a Program EIR allows the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and allow reduction in paperwork. In addition, it may be used with the intent of streamlining and limiting the later environmental review required for projects that implement the draft MPU.

IV. HISTORY OF PROJECT CHANGES

This section of the PEIR shall outline the history of the project and any physical changes that have been made to the project in response to environmental concerns raised during the City's review of the project.

V. ENVIRONMENTAL ANALYSIS

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. The EIR must represent the independent analysis of the City of San Diego as Lead Agency; therefore, all impact analysis must be based on the City's current *California Environmental Quality Act - Significance Determination Thresholds prepared by the Development Services Department (January 2011)*.

Adoption of the MPU, NRMP and community plan technical amendments is not in and of itself a significant impact. The proposed "Project" would provide a comprehensive approach to the management of natural and cultural resources within MTRP through

adoption of the MPU and NRMP and would facilitate timely and environmentally responsible implementation protocols. Future projects implemented in accordance with the MPU and NRMP however, have the potential to impact resources, and therefore the EIR Project Description should include a discussion of how future projects would implement the MPU/NRMP during subsequent impact analysis and environmental review pursuant to CEQA. This should take the form of a Mitigation Framework which will lay the foundation for how future projects are reviewed to assure compliance with the MPU and NRMP and fully documented in the subsequent environmental review process.

Below are key environmental issue areas that have been identified for this Project, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing Project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed Project and its alternatives. Lastly, the identification of a reasonable range of mitigation measures (included in the Mitigation Framework) and/or alternatives, whether proposed or not, for each identified significant impact should also be included in the issue area discussions.

LAND USE

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan (General Plan), the City of San Diego Municipal Code, or the Tierrasanta, Navajo, East Elliot Community Plan areas and the Rancho Encantada Precise Plan area?

Issue2: Would the proposed Master Plan Update and Natural Resource Management Plan result in a conflict with adopted environmental plans, including the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan and the Multi Habitat Planning Area (MHPA) adopted for the purpose of avoiding or mitigating an environmental effect for the area?

Issue 3: Would the proposed Master Plan Update and Natural Resource Management Plan affect the long-term conservation of biological resources as described in the MSCP? Would the proposed Master Plan Update and Natural Resource Management Plan meet the objectives of the MSCP's Land Use Adjacency Guidelines or conflict with the provisions of the City's MSCP, Subarea Plan or other approved local, regional, or state conservation plans?

The PEIR should evaluate how the draft MPU/NRMP accomplishes or fails to implement the goals, objectives, and recommendations of the General Plan, San Diego Municipal Code, San Diego's City's Land Development Code or relevant community plans. If any inconsistencies are identified, the Land Use Section of this PEIR should also identify if

these inconsistencies warrant an environmental impact. The PEIR should also address the land use compatibility with final MSCP Plan (August 1998), and the City's MSCP Subarea Plan (March 1997). A description of measures proposed to reduce any identified MHPA adverse edge effects should be included within this section as well.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in a substantial change to natural topography or other ground surface relief features?

Issue 2: Would implementation of the proposed Master Plan Update and Natural Resource Management Plan result in the blockage of public views from designated open space areas, roads, or to any significant visual landmarks or scenic vistas?

Issue 3: Would the proposed Master Plan Update and Natural Resource Management Plan affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways, public viewing areas, vistas, or open spaces?

Issue 4: Would the proposed Master Plan Update and Natural Resource Management Plan be compatible with surrounding development in terms of bulk, scale, materials, or style?

To the extent feasible, the PEIR should include an evaluation of potential for impacts on the natural landforms within the MTRP and Project boundaries resulting from implementation of project components. The City's Significance Determination Thresholds include the following in determining such impacts: exceed the allowed height or bulk regulations and existing patterns of development in the surrounding area by a significant margin; and/or located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. If any project components include such elements, this section of the PEIR should, therefore, include a conceptual description and analysis of the allowed building mass, bulk, height, and architectural style that could result from the draft MPU/NRMP. The EIR shall also analyze the use of solar panels on facilities within MTRP such as, but not limited to exterior lighting of parking lots, bollards or interpretive panels that could emit or reflect a significant amount of light or glare and any potential effect on light sensitive species and/or aviation (e.g., MCAS Miramar, Gillespie Field, Lindbergh Field). Renderings, cross sections and visual simulations of the proposal should be incorporated into the EIR section.

AIR QUALITY/ODOR

Issue 1: Would implementation of the proposed Master Plan Update and Natural Resource Management Plan result in an increased number of automobile trips which would/could potentially affect San Diego's ability to meet regional, state and federal clean air standards?

Issue 2: Would implementation of the proposed Master Plan Update and Natural Resource Management Plan result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

The PEIR should describe the draft MPU/NRMP area's climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards (AAQS). It should discuss both the potential stationary and non-stationary air emission sources related to the land use modifications associated with the draft MPU/NRMP and particularly vehicle emission sources. Should the draft MPU/NRMP result in a significant decrease in the levels-of-services of any roadway or intersection, the PEIR should address the potential degradation of air quality which may result, including the possibility of "hotspots" within the area. While only a guideline and not a rule or regulation, the PEIR should also discuss consistency with the California Air Resources Board Air Quality and Land Use Handbook.

The PEIR will include a qualitative description of potential impacts to air quality and compliance with AAQS associated with subsequent activities that implement the draft MPU/NRMP. However, a quantified analysis of future project impacts to air quality would not be addressed in the PEIR and future project level impacts would be subject to subsequent environmental review under CEQA.

Although air quality impacts are not anticipated for this project, the PEIR should discuss the draft MPU/NRMP's impact on the ability of the San Diego Air Basin to meet regional air quality strategies (RAQS). It should discuss any short, long-term, and cumulative impacts the project may have on regional air quality, including construction and transportation-related sources of air pollutants, and the potential impacts from the increase in vehicle trips to the RAQS, the overall air quality impacts from such trips, and any proposed mitigation measures. The section should also address any affects of the MPU/NRMP related to climate change and greenhouse gas emissions.

BIOLOGICAL RESOURCES

Issue 1: Would implementation of the proposed Master Plan Update and Natural Resource Management Plan result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

Issue 2: Would the proposed Master Plan Update and Natural Resource Management Plan result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species?

Issue 3: Would the proposed Master Plan Update and Natural Resource Management Plan result in an impact to a sensitive habitat, including, but

not limited to streamside vegetation, oak woodland, vernal pools, wetland, coastal sage scrub, or chaparral?

Issue 4: Would the proposed Master Plan Update and Natural Resource Management Plan result in the introduction of invasive species of plants into the area?

Issue 5: Would the proposed Master Plan Update and Natural Resource Management Plan result in an impact on City, State, or Federally regulated wetlands (including but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filling, hydrological interruption or other means?

A series of diverse habitats would potentially be directly or indirectly affected by the draft MPU/NRMP, and to the extent feasible, should be fully discussed in this section of the PEIR. A biological resources constraints analysis, based on existing inventory of biological resources information already assembled for the draft MPU/NRMP, should be prepared to address existing conditions, potential constraints, and opportunities related to biological resources within the project study area. The analysis should also include limited site reconnaissance as necessary to accurately represent the existing conditions discussion of the PEIR. The analysis must also identify, based on the draft MPU/NRMP documentation, any MSCP covered and narrow endemic flora and fauna, which are known to be, or to have a potential to exist, in the draft MPU/NRMP area.

The impacts to identifiable wetland habitat should be addressed within this section of the PEIR. Wetland habitat types should be shown graphically and include recommendations to sustain their functionality based on the development standards proposed for Mission Trails Regional Park area. If impacts to any wetlands or wetlands buffers are identified, a discussion of the infeasibility of avoiding such impacts with the draft MPU/NRMP should be included.

Encroachment into the City's MHPA would occur with the draft MPU/NRMP. Both the biological constraints analysis and the Biological Resources section of the PEIR should disclose potential MHPA boundary adjustments or corrections that may be required with implementation of subsequent activities that implement the draft MPU/NRMP. However, detailed descriptions of the MHPA boundary adjustments and the functional equivalence analysis required for future projects would not be addressed in the PEIR. Any MHPA boundary adjustments associated with development of projects that implement the draft MPU/NRMP would be subject to subsequent environmental review.

HISTORICAL RESOURCES

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in the alteration or destruction of a prehistoric or

historic archaeological site, or any adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?

Issue 2: Would the proposed Master Plan Update and Natural Resource Management Plan result in any impact to existing religious or sacred uses within the potential impact area?

Issue 3: Would the proposed Master Plan Update and Natural Resource Management Plan result in the disturbance of any human remains, including those interred outside of formal cemeteries?

The draft MPU/NRMP area contains numerous archaeological sites. A cultural resources constraints analysis, based on existing inventory of historical and cultural resources information already assembled for the draft MPU/NRMP, should be prepared for the proposed project to address existing conditions, potential constraints and opportunities related to cultural and historic resources within the project area. The analysis should include the records search of local databases as well as site reconnaissance as necessary to verify locations of cultural resources sites identified in the records research. If appropriate, the PEIR should identify requirements for when archaeological mitigation would be required. Although the draft MPU/NRMP will not result in direct impacts, the PEIR should discuss cumulative impacts relative to the loss of paleontological resources.

A Sacred Lands File Search should also be conducted by the Native American Heritage Commission for this project, as well as Native American consultation in accordance with Senate Bill 18.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan expose people or property to health hazards, including fire?

Issue 2: Would the proposed Master Plan Update and Natural Resource Management Plan create future risk of an explosion or the release of hazardous substance (including, but not limited to gas, oil, pesticides, chemicals, or radiation)? Would the proposed Master Plan expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?

Issue 3: Would the proposed Master Plan's uses be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 6596.25 and, as a result, create a significant hazard to the public or environment?

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The PEIR should discuss the draft MPU/NRMP in terms of human/public safety as it relates to fire hazards within and adjacent to the plan boundaries.

Given that military uses have occurred within portions of the draft MPU/NRMP area, the PEIR should address the potential for unexploded ordnance (UXO) as defined by the U.S. Army Corps of Engineers (USACOE). As part of the environmental review process, steps are needed to disclose and address the safe removal, disposal, and/or remediation of unexploded ordnance materials. There are Federal and State requirements that are mandated to be incorporated into a project that may have these issues. The PEIR should include a general, qualitative evaluation of the potential presences of unexploded ordnance materials and the expected nature of these materials that may occur within the planning area.

The PEIR will include a qualitative description of potential hazards and hazardous materials issues that intersect or interface with the draft MPU/NRMP area. However, a quantified analysis based on Phase I site assessment would not be addressed in the PEIR. The PEIR should however provide recommendations for when future project would be required to conduct Phase I site assessments as part of subsequent environmental review under CEQA.

HYDROLOGY/WATER QUALITY

- Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in an increase in impervious surfaces and associated increased runoff? Would the proposed Master Plan Update and Natural Resource Management Plan result in a substantial alteration to on-and off-site drainage patterns due to changes runoff flow rates or volumes?**
- Issue 2: What modifications to the natural drainage system would be required for implementation of the proposed Master Plan Update and Natural Resource Management Plan? Would there be an effect on the drainage basins within the San Diego River watershed with implementation of the proposed Master Plan Update and Natural Resource Management Plan?**
- Issue 3: Would the proposal result in alterations to the course or flow of flood waters?**
- Issue 4: Would the proposed Master Plan create discharges into surface or ground water, or in any alteration of surface or ground water quality, including, but not limited to temperature, dissolved oxygen or turbidity? Would there be increases in pollutant discharges including downstream sedimentation?**
- Issue 5; Would the proposed Master Plan Update and Natural Resource Management Plan, when considered in combination with past, current, and future projects in the affected watersheds, result in cumulative significant impacts on the hydrology and water quality?**

HYDROLOGY

Hydrology deals with the properties, distribution, and circulation of surface water, ground water, and atmospheric water. The quantity of water which flows in a creek or river is calculated based on historic climatic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are all watershed characteristics that influence the quantity of surface flows.

A technical study should be prepared for the PEIR to address the existing conditions, potential constraints and opportunities related to hydrology resources within the project study area. The study will be based on an existing inventory of hydrology resource information already assembled for the draft MPU/NRMP and other related documents.

WATER QUALITY

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed, the impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. Degradation of water quality could impact human health as well as wildlife systems. Sedimentation can cause impediments to stream flow. In addition, oxygen availability is affected by sedimentation, which can significantly influence aquatic and riparian habitats. Therefore, the PEIR should discuss how the draft MPU/NRMP could affect water quality within the project area and downstream.

A technical study should be prepared for the PEIR to address the existing conditions, potential constraints and opportunities related to water quality within the project study area. The study will be based on water quality information already assembled for the draft MPU/NRMP and other related documents.

GEOLOGY/SOILS

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan expose people or property to geologic hazards such as earthquakes, mudslides, liquefaction, ground failure, or similar hazards?

Issue 2: Would the proposed Master Plan Update and Natural Resource Management Plan increase the potential for erosion of soils on-or off-site?

The geologic and subsurface conditions in the proposed project area will be described in this section, along with existing topography, geology (surface and subsurface), tectonics and soil types. Possible impacts to the MPU/NRMP area from geologic hazards and unfavorable soil conditions also will be addressed. The constraint discussion should include issues such as the potential for liquefaction, slope instability, and rockfall hazards. Any need for blasting should also be identified, if such measures are anticipated. Any secondary issues due to soils/geology (e.g., excavation of unsuitable soils) should also be addressed.

The PEIR will include a qualitative description of potential geologic hazard issues that could be encountered within the MPU/NRMP area. However, a quantified analysis based on project level geotechnical analysis would not be addressed in the PEIR. The PEIR should however provide recommendations for when a future project would be required to conduct geotechnical assessments as part of subsequent environmental review under CEQA. This could be shown in table form in the PEIR and must reference the City's Seismic Safety study (1995).

PALEONTOLOGICAL RESOURCES

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in the loss of significant paleontological resources?

The PEIR should include a discussion of the potential for loss of sensitive paleontological resources in conjunction with the implementation of the draft MPU/NRMP. Although the MPU/NRMP will not result in direct impacts, the PEIR should discuss cumulative impacts relative to the loss of paleontological resources.

TRANSPORTATION/CIRCULATION/PARKING

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in an increase in projected traffic that is substantial in relation to the capacity of the existing and planned circulation system?

Issue 2: Would the proposed Master Plan Update and Natural Resource Management Plan create alterations to present circulation movements in the area including effects on existing public access points?

Issue 3: Would the proposed Master Plan Update and Natural Resource Management Plan impact the availability of parking?

Issue 4: Would the proposed Master Plan Update and Natural Resource Management Plan conflict with the adopted policies, plans or programs supporting alternative transportation modes (e.g. bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?

The draft MPU/NRMP should include a traffic study to estimate the expected trips that could be generated based on the MPU boundaries and potential impacts on intersections, roadways, and freeways throughout the entire project area. The traffic study would be based on transportation and circulation information already assembled for the draft MPU/NRMP and other related documents and would form the basis of the impact analysis for this section of the draft PEIR. The study should identify traffic volumes and levels of service on existing adjacent roadways and at public access points and parking areas based on the City of San Diego standards and determine whether additional improvements are required. The traffic study and PEIR should include descriptions and applicable graphics of the existing transportation/circulation and parking conditions within the MPU/NRMP area.

PUBLIC SERVICES

Issue 1: Would the proposed Master Plan Update and Natural Resource Management Plan result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

The PEIR analysis of public facilities should determine if the draft Master Plan would result in impacts to fire, police, school, solid waste, or park services within the project area. The PEIR should describe the public services currently available and how they intersect or interface with the Regional Park.

PUBLIC UTILITIES

Issue 1: Would the proposed project result in the need for new systems or require substantial alterations to existing utilities including water infrastructure, wastewater infrastructure, storm water drainage, water conservation, energy or solid waste disposal, the construction of which would create a physical effect on the environment? These systems include communications systems, water, reclaimed water, sewer, storm water drainage and solid waste disposal.

The PEIR analysis of public facilities should determine if the draft Master Plan would result in impacts to Public Utilities including water, sewer, water conservation, and solar energy within the project area. This section shall discuss the existing public utilities that serve the Master Plan area and how they intersect or interface within the Regional Park. The EIR shall identify any conflicts with existing infrastructure, evaluate the need for upgrading infrastructure and/or demonstrate that facilities would have sufficient capacity to serve the needs of the project.

It may be necessary to prepare a sewer/water utility study that further describes the existing conditions within the Master Plan area. This information will assist staff in determining if proposed trail locations are in conflict with existing or future utility services. In addition, hydrology and water quality studies shall be prepared in accordance with City standards and include information regarding drainage patterns in the Master Plan areas and identify appropriate treatment Best Management Practices (BMPs) for future project projects implemented in accordance with the MPU and NRMP. These reports shall be included in the appendix to the EIR and incorporated into the EIR discussion.

I. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This section shall describe the significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Section 15126.2(c), the PEIR must include a discussion of any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. The PEIR should also address the use of nonrenewable resources associated with MPU/NRMP implementation. See CEQA Section 15127 for limitations on the requirements for this discussion.

VIII. GROWTH INDUCEMENT

Although implementation of the MPU/NRMP would not be considered growth inducing since the area is already predominantly undeveloped and additional development associated with the Community Plans and Precise Plan would do not identify the Plan area for development, the PEIR should address the potential for growth inducement. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

IX. CUMULATIVE IMPACTS

When the draft MPU/NRMP is considered with other past, present, and reasonably foreseeable projects in the City of San Diego and the communities of Tierrasanta, Navajo, East Elliot and Rancho Encantada, implementation could result in significant environmental changes which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts should be discussed in a separate section of the PEIR.

Issue 1: What are the cumulative impacts of the proposed Master Plan Update and Natural Resource Management Plan in conjunction with other approved or proposed projects within the subregional area?

The PEIR should summarize the overall short-term and long-term impacts the draft MPU/NRMP could have in relation to other planned and proposed projects in the area defined above. Specifically, this section shall take into consideration projects such as, but not limited to the San Diego River Park Master Plan, Sycamore Landfill, and the Castlerock development, etc.

X. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the PEIR should include a brief discussion of issues areas that were not considered to be potentially significant. If these or other potentially significant issue

area arise during detailed environmental investigation of the project, however, consultation with this division is recommended to determine if these other issue areas need to be addressed in the PEIR. Additionally, as supplementary information is submitted, the PEIR may need to be expanded to include additional issue areas. Based on preliminary analysis, issue areas that were not considered to be potentially significant include: Agriculture, Mineral Resources, Noise and Utilities, but should be discussed briefly in the PEIR.

XI. ALTERNATIVES

The PEIR should analyze reasonable alternatives which avoid or mitigate the draft MPU/NRMP's significant environmental impacts. These alternatives should be identified and discussed in detail, and should address all significant impacts. The alternative's analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should also be explained. Please note that these alternatives should address issues at a programmatic level and should not be developed to reduce or avoid impacts of a specific project or project-level concerns. At a minimum, the following two alternatives shall be considered:

A. The No Project Alternative

The No Project Alternative should discuss the existing conditions of the project site at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the MPU/NRMP were not approved. For example, this alternative would assume conditions under the existing Master Plan for MTRP and as described in the existing community plans. This alternative should compare the environmental effects of the Master Plan boundaries remaining in its existing state (or in what would reasonably be expected to occur) against environmental effects that would occur if the Project were approved. Should the No Project Alternative prove to be the environmentally preferred alternative, then according to CEQA, another environmentally preferred alternative must be identified for the Project.

B. The Reduced Project Alternative

The Reduced Project Alternative should analyze implementing a MPU/NRMP with similar but reduced uses than what is described in the proposed Project. This alternative may or may or may not include community plan technical amendments, depending upon where the plan area modifications occur. As with the proposed Project, this alternative would be fully consistent with the Environmentally Sensitive Lands Regulations (ESL) including encroachment allowances permitted for steep slopes, wetlands, and sensitive biology, and consistent with the Historical Resources

Regulations for archaeological sites, without the need for deviations or variances in order for park projects to be implemented in the future. This alternative will consider the impacts of a reduced project which includes a land use plan and policies that reduce significant impacts for the same issue areas as analyzed for the Project at a programmatic level and should not be developed to reduce or avoid impacts of a specific project or project level concerns.

If through the environmental analysis process, other alternative become apparent which would mitigate potentially significant impacts; these must be discussed with environmental staff prior to including them in the EIR. It is important to emphasize that the alternatives section of the EIR should constitute a major part of the document. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

XII. MITIGATION FRAMEWORK - MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP)

A Mitigation Framework should be clearly identified, discussed, and their effectiveness assessed in each issue section of the PEIR. The Mitigation Framework will be the basis for which for future projects implemented in accordance with the MPU and NRMP are evaluated or designed to assure compliance with goals, objective and policies contained within the planning documents. At a minimum, the Mitigation Framework should identify: 1) the City department or other entity responsible for implementing the program or monitoring its affects; 2) the monitoring and reporting schedule, and 3) the completion requirements. The Mitigation Framework shall also be contained (verbatim) as a separate chapter in the PEIR. Formatting of this section will be developed in consultation with the environmental analyst.

XIII. OTHER

The EIR shall include sections for references, individuals and agencies consulted, as well as a certification page. Appendices shall be included in the Table of Contents, but are bound under separate cover and/or will be included on a CD attached to the back page of the DEIR. In addition, other specific direction regarding formatting, content and processing of the DEIR will be provided by environmental staff prior to submittal of the first screencheck DEIR for internal staff review.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

April 3, 2014

To: Reviewing Agencies

Re: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan
Technical Amendments
SCH# 2014041011

Attached for your review and comment is the Notice of Preparation (NOP) for the Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Myra Herrmann
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 2014041011
Project Title Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan
Lead Agency Technical Amendments
San Diego, City of

Type NOP Notice of Preparation
Description City Council Approval (Process 5) of the Mission Trails Regional Park (MTRP) Master Plan Update (Master Plan), Natural Resource Management Plan (NRMP) and associated community plan technical amendments. In 2010, the City of San Diego initiated a project to update the 1985 MTRP Master Plan, develop a NRMP, and process a Programmatic EIR to cover the activities identified in both.

Lead Agency Contact

Name Myra Herrmann
Agency City of San Diego
Phone 619 446 5372
email
Address 1222 First Avenue, MS-501
City San Diego
Fax
State CA **Zip** 92101

Project Location

County San Diego
City San Diego, La Mesa, El Cajon
Region
Cross Streets Mission Gorge Rd, Father Juniper Serra Rd, Santo Road, Jackson Drive, Mast Blvd
Lat / Long 32° 48' 39.1236" N / 117° 3' 23.6874" W
Parcel No.

Township	Range	Section	Base
			SBB&M

Proximity to:

Highways I-8, 15, SR-125
Airports Gillespie Field/MCAS Miramar
Railways
Waterways San Diego River
Schools Grossmont Community College
Land Use Open water / Open-Space / Recreation, public land, public right-of-way

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects
Other Issues

Reviewing Agencies Resources Agency; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9

Date Received 04/03/2014 **Start of Review** 04/03/2014 **End of Review** 05/02/2014

Distribution List

County: San Diego

SCH#

2014041011

es Agency

urces Agency

Il Gayou

Dept. of Boating & Waterways

Wong

California Coastal Commission

John A. Fuchs

Colorado River Board

a Trujillo

Dept. of Conservation

John Carpenter

California Energy Commission

John Wright

Cal Fire

Foster

Central Valley Flood Protection Board

John Herola

Office of Historic Preservation

John Parsons

Office of Parks & Recreation

Environmental Stewardship

John

California Department of Resources, Recycling & Environment

John Leary

3.F. Bay Conservation & Development Comm.

John McAdam

Dept. of Water Resources

Agency

Il Gayou

Game

Department of Fish & Wildlife

Flint

Environmental Services Division

John

Fish & Wildlife Region 1

John Koch

☐ Fish & Wildlife Region 1E

Laurie Harnsberger

☐ Fish & Wildlife Region 2

Jeff Drongosen

☐ Fish & Wildlife Region 3

Charles Amor

☐ Fish & Wildlife Region 4

Julie Vance

☒ Fish & Wildlife Region 5

Leslie Newton-Reed

Habitat Conservation Program

☐ Fish & Wildlife Region 6

Gabrina Gatchel

Habitat Conservation Program

☐ Fish & Wildlife Region 6 I/M

Heidi Sickler

Inyo/Mono. Habitat Conservation Program

☐ Dept. of Fish & Wildlife M

George Isaac

Marine Region

Other Departments

☐ Food & Agriculture

Sandra Schubert

Dept. of Food and Agriculture

☐ Department of General Services

Public School Construction

☐ Dept. of General Services

Anna Garbelf

Environmental Services Section

☐ Dept. of Public Health

Jeffery Worth

Dept. of Health/Drinking Water

☐ Delta Stewardship Council

Kevan Samsam

☐ Independent Commissions/Boards

☐ Delta Protection Commission

Michael Machado

☐ OES (Office of Emergency Services)

☐ OES (Office of Emergency Services)

☒ Native American Heritage Comm.

Debbie Treadway

☒ Public Utilities Commission

Leo Wong

☐ Santa Monica Bay Restoration

Guangyu Wang

☐ State Lands Commission

Jennifer Deleong

☐ Tahoe Regional Planning Agency (TRPA)

Cherry Jacques

Business, Trans & Housing

☐ Caltrans - Division of Aeronautics

Philip Crimmins

☐ Caltrans - Planning

Terri Pencovic

☒ California Highway Patrol

Suzann Ikeuchi

Office of Special Projects

☐ Housing & Community Development

CEQA Coordinator

☐ Housing Policy Division

Dept. of Transportation

☐ Caltrans, District 1

Rex Jackman

☐ Caltrans, District 2

Marcelino Gonzalez

☐ Caltrans, District 3

Gary Arnold

☐ Caltrans, District 4

Erik Alm

☐ Caltrans, District 5

David Murray

☐ Caltrans, District 6

Michael Navarro

☐ Caltrans, District 7

Dianna Watson

☐ Caltrans, District 8

Dan Kopulsky

☐ Caltrans, District 9

Gayle Rosander

☐ Caltrans, District 10

Tom Dumas

☒ Caltrans, District 11

Jacob Armstrong

☐ Caltrans, District 12

Maureen El Harake

Cal EPA

Air Resources Board

☒ All Projects

CEQA Coordinator

☐ Transportation Projects

Nesamani Kalandiyur

☐ Industrial Projects

Mike Tollstrup

☐ State Water Resources Control Board

Regional Programs Unit

Division of Financial Assistance

☐ State Water Resources Control Board

Student Intern, 401 Water Quality Certification Unit

Division of Water Quality

☐ State Water Resources Control Board

Phil Grader

Division of Water Rights

☐ Dept. of Toxic Substances Control

CEQA Tracking Center

☐ Department of Pesticide Regulation

CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1

Cathleen Hudson

North Coast Region (1)

☐ RWQCB 2

Environmental Document Coordinator

San Francisco Bay Region (2)

☐ RWQCB 3

Central Coast Region (3)

☐ RWQCB 4

Teresa Rodgers

Los Angeles Region (4)

☐ RWQCB 5S

Central Valley Region (5)

☐ RWQCB 5F

Central Valley Region (5)

Fresno Branch Office

☐ RWQCB 5R

Central Valley Region (5)

Redding Branch Office

☐ RWQCB 6

Lahontan Region (6)

☐ RWQCB 6V

Lahontan Region (6)

Victorville Branch Office

☐ RWQCB 7

Colorado River Basin Region (7)

☐ RWQCB 8

Santa Ana Region (8)

☒ RWQCB 9

San Diego Region (9)

☐ Other

☐ Other

☐ Other

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Notice of Completion & Environmental Document Transmittal

2014041011

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments

Lead Agency: City of San Diego

Contact Person: MYRA HERRMANN

Mailing Address: 1222 1st Avenue, MS 501

Phone: 619-446-5372

City: SAN DIEGO

Zip: 92101

County: SAN DIEGO

Project Location: County: SAN DIEGO City/Nearest Community: San Diego/Navajo, Tierrasanta, East Elliott/Santee/La Mesa/El Cajon

Cross Streets: Mission Gorge Rd, Father Juniper Serra Rd, Santo Road, Jackson Drive, Mast Blvd. Zip Code: various zip codes

Lat. / Long.: 32° 48' 39.1236" N/ 117° 03' 23.6874" W (this location represents MTRP Visitor's Center) Total Acres: N/A

Assessor's Parcel No: N/A Section: Twp.: Range: Base: San Bernardino/
La Mesa, Poway/El Cajon

Within 2 Miles: State Hwy #: I-8, I-15, SR-125

Waterways: San Diego River

Airports: Gillespie Field/MCAS Miramar

Railways: N/A

Schools: Grossmont Community College

Document Type:

CEQA: ☒ NOP ☐ Draft EIR ☐ Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other
☐ Mit Neg Dec Other ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☒ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.)
☒ Other: Park Master Plan, Natural Resources Management Plan, Community Plan Technical Amendments

Development Type:

☐ Residential: Units Acres ☐ Water Facilities: Type MGD
☐ Office: Sq.ft. Acres Employees ☐ Transportation: Type
☐ Commercial: Sq.ft. Acres Employees ☐ Mining: Mineral
☐ Industrial: Sq.ft. Acres Employees ☐ Power: Type MW
☐ Educational ☐ Waste Treatment: Type MGD
☒ Recreational Park Master Plan, NRMP ☐ Hazardous Waste: Type
☐ Other:

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☐ Agricultural Land ☒ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☐ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☐ Soil Erosion/Compaction/Grading ☒ Wildlife
☐ Coastal Zone ☒ Noise ☐ Solid Waste ☐ Growth Inducing
☒ Drainage/Absorption ☐ Population/Housing Balance ☒ Toxic/Hazardous ☒ Land Use
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Cumulative Effects
☒ Other Greenhouse Gas Emissions, Energy Conservation

Present Land Use/Zoning/General Plan Designation:

Open water/open-space/recreation, public land, public right-of-way

Project Description: (please use a separate page if necessary)

SEE NEXT PAGE FOR PROJECT DESCRIPTION

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<u>S</u> Air Resources Board	_____ Office of Emergency Services
_____ Boating & Waterways, Department of	_____ Office of Historic Preservation
_____ California Highway Patrol	_____ Office of Public School Construction
_____ CalFire	_____ Parks & Recreation
<u>S</u> Caltrans District # 11	_____ Pesticide Regulations, Department of
_____ Caltrans Division of Aeronautics	_____ Public Utilities Commission
<u>S</u> Caltrans Planning (Headquarters)	<u>S</u> Regional WQCB # 9
_____ Central Valley Flood Protection Board	<u>S</u> Natural Resources Agency
_____ Coachella Valley Mountains Conservancy	_____ S.F. Bay Conservation & Development Commission
_____ Coastal Commission	_____ San Gabriel & Lower L.A. Rivers and Mtns Conservancy
_____ Colorado River Board	_____ San Joaquin River Conservancy
_____ Conservation, Department of	_____ Santa Monica Mountains Conservancy
_____ Corrections, Department of	_____ State Lands Commission
_____ Delta Protection Commission	_____ SWRCB: Clean Water Grants
_____ Education, Department of	_____ SWRCB: Water Quality
<u>S</u> Energy Commission	_____ SWRCB: Water Rights
<u>S</u> Fish & Game Region # 5	_____ Tahoe Regional Planning Agency
_____ Food & Agriculture, Department of	<u>S</u> Toxic Substances Control, Department of
_____ General Services, Department of	_____ Water Resources, Department of
_____ Health Services, Department of	
_____ Housing & Community Development	<u>S</u> Other <u>CAL EPA</u>
<u>S</u> CalRecycle	<u>S</u> Other <u>San Diego River Conservancy</u>
<u>S</u> Native American Heritage Commission	<u>S</u> Other <u>TRANSPORTATION COMMISSION</u>

Local Public Review Period (to be filled in by lead agency)

Starting Date: April 2, 2014

Ending Date: May 2, 2014

Lead Agency (Complete if applicable):

Consulting Firm: RECON Environmental, Inc.

Applicant: City of San Diego, Planning, Neighborhoods & Economic Development Department

Address: 1927 Fifth Avenue

Address: 1222 1st Avenue, MS 412 Attn: Jeff Harkness

City/State/Zip: San Diego, CA 92101

City/State/Zip: San Diego, CA 92101

Contact: Lee Sherwood

Phone: 619-533-6595

Phone: 619-308-9333

Signature of Lead Agency Representative: 

Date: April 2, 2014

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

PROJECT DESCRIPTION

CITY COUNCIL APPROVAL (Process 5) of the Mission Trails Regional Park (MTRP) Master Plan Update (Master Plan), Natural Resource Management Plan (NRMP) and associated community plan technical amendments. In 2010, the City of San Diego initiated a project to update the 1985 MTRP Master Plan, develop a NRMP, and process a Programmatic Environmental Impact Report (PEIR) to cover the activities identified in both.

MASTER PLAN CONTENT

The purpose for the MPU is multi-faceted:

- 1) Fully incorporate the resource protection and management requirements of the Multiple Species Conservation Program (MSCP) into an NRMP for MTRP and coordinate the recommendations and management actions between the MPU and NRMP;
- 2) Incorporate within the MTRP boundaries and provide master planning for the management of resources and the development of recreational opportunities within lands acquired for preservation in the East Elliott community plan area, while continuing to provide for potential private development per the current Community Plan and MSCP guidelines;
- 3) Incorporate within the MTRP boundaries the MSCP preserve lands created as part of the Rancho Encantada Specific Plan in order to provide consistent centralized natural resource and recreation management;
- 4) Update the planning recommendations in the 1985 Master Plan for MTRP based on the public's recreational desires, planning overlays, policies and regulations.

The MTRP MPU/NRMP is a policy document that establishes the planning framework for the future design, implementation, and management of the Park. The Goals and Policies in the MPU provide specific guidance on critical park implementation issues, so that all aspects of development and operation will be consistent with the agreed upon park concept.

The objectives of the MTRP MPU/NRMP are to:

1. Define the Park's setting in terms of physical environment, aesthetics, public plans and policies, surrounding land use and ownership;
2. Identify recreational and other open space potentials within the Park setting;
3. Assess existing and potential relationships (especially edges, roads, and trail linkages) between the Park, its immediate surroundings, and the San Diego region as a whole; and
4. Maintain and update a comprehensive Master Plan in terms of park uses, facility sizes and locations, environmental and architectural design concepts, and strategies to avoid or minimize environmental impacts.

PROJECT LOCATION

Currently, MTRP is about 5,800 acres of land between Interstate 8 to the south and State Route 52 (SR-52) to the north. The existing park is split into four planning areas: Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain. Surrounding MTRP is the City of San Diego Community Planning Areas of Tierrasanta to the west, Navajo to the south, and East Elliott to the north. MCAS Miramar also occurs north of SR 52. The Cities of Santee, El Cajon and La Mesa are along various portions of the eastern boundary.

The East Elliott area will add approximately 2,500 acres to MTRP. This includes almost the entire East Elliott community plan area, excluding private land currently being processed for residential development along its eastern edge. Active land management and monitoring activities will only occur on publicly owned lands or privately held lands with a conservation easement.

The West Sycamore area will add approximately 1,300 acres to MTRP. This area is the eastern half of the Rancho Encantada Precise plan area which abuts MCAS Miramar to the south, the City of Poway to the north, and the County of San Diego to the east.



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624



California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-SDG-13B0298-14TA0288

Ms. Myra Herrmann
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

MAY 01 2014

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Mission Trails Regional Park Master Plan Update/ Natural Resources Management Plan/Community Plan Technical Amendments (SCH# 2014041011), City of San Diego, California

Dear Ms. Herrmann:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the Notice of Preparation (NOP) dated April 2, 2014, for the proposed Draft Environmental Impact Report (DEIR) for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) in the City of San Diego (City), California. The comments and recommendations provided herein are based on the information provided in the NOP, our knowledge of sensitive and declining vegetation communities in the region, and our participation in the Multiple Species Conservation Program (MSCP) and the City's MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The Department is a Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and is 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 §2050 *et seq.*) and Fish and Game Code Section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning Program (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP and the Service's HCP programs by implementing its MSCP SAP.

According to the NOP, the MPU, and NRMP would serve as policy documents that establish the planning framework for the future design, implementation, and management of the 5,800-acre MTRP. MTRP consists of six planning areas including: Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, East Elliot, and West Sycamore. The goals and policies covered by the MPU would provide specific guidance on critical park implementation issues, so that all aspects of the development and operation would be consistent with the agreed upon park concept. The intent of the MPU is to incorporate the resource protection and management requirements of the MSCP into an NRMP for MTRP, and coordinate the recommendations and management actions between the MPU and NRMP. The MPU would provide master planning for the management of resources and the development of recreational opportunities, including lands acquired for preservation in the East Elliot community plan area, while continuing to provide for potential private development per the current Community Plan and MSCP guidelines.

We would like to emphasize that MTRP is a core resource under the City's MSCP SAP, containing many sensitive biological resources that are covered under the MSCP and associated Implementing Agreement. Maintaining the biological resources and habitat connectivity within this area is essential to ensure the continued coverage for plants and animals provided under the City's SAP.

The Wildlife Agencies previously provided comment letters on May 24, 2013, and August 1, 2013, that addressed concerns that with the preliminary drafts of the MPU and NRMP. Additionally, the Wildlife Agencies provided separate comment letters on April 1, 2014, that provided revisions and management measures for incorporation into the draft versions of the MPU and NRMP and recommendations for new trail proposals and realignments of the proposed trails network. Copies of the referenced letters are attached. The Wildlife Agencies believe the issues identified in our comment letters remain pertinent and respectfully request that they be carefully considered in your evaluation of viable project alternatives during preparation of the draft EIR for the MTRP MPU and NRMP.

We appreciate coordinating with the City during the preliminary stages of developing the MPU and NRMP and look forward to continued cooperation as we move forward towards project completion. If you have questions or comments regarding this letter please contact Patrick Gower of the Service at 760-431-9440 or Paul Schlitt of the Department at 858-637-5510.

Sincerely,



Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

Enclosures

Enclosure 1



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624



California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-SDG-13B0298-13TA0290

Mr. Jeffrey Harkness
Park Planner
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, California 92101

MAY 24 2013

Subject: Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resource Management Plan (NRMP), City of San Diego, California.

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the above-referenced documents, which we received on March 27, 2013. The comments provided herein are based on information provided in the draft MPU and NRMP, our meeting on May 17, 2013, our knowledge of sensitive and declining vegetation communities, our participation in the Multiple Species Conservation Program (MSCP), and the City of San Diego's (City) MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCPs) developed under section 10(a)(1) of the Act.

The Department is a Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and 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 §2050 *et seq.*) and Fish and Game Code Section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning Program (NCCP). The City participates in the NCCP and the Service's HCP Programs by implementing its MSCP SAP. The NRMP is an implementing requirement of the City's SAP. The NRMP serves as a set of area specific

management directives (ASMDs) for this conserved area of the City's SAP pursuant to section 10.6, Preserve Management, of the City's SAP Implementing Agreement (IA).^a

The overarching goal of the MSCP is to maintain and enhance biological diversity in the region and conserve viable populations of sensitive species. Important biological resources in the MTRP include coastal sage scrub, riparian scrub, and vernal pools. Significant populations of willow monardella [*Monardella viminea* (*M. linoides* subsp. *v.*)], San Diego thornmint (*Acanthomintha ilicifolia*), Orcutt's brodiaea (*Brodiaea orcuttii*), San Diego ambrosia (*Ambrosia pumila*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), least Bell's vireo (*Vireo bellii pusillus*), and coastal California gnatcatcher (*Polioptila californica californica*) occur in the MTRP. The MTRP includes mitigation areas and lands in the City's SAP Multiple Habitat Planning Area (MHPA), or preserve, used to fulfill MSCP conservation obligations.

The management directives for trail location, design, and management, especially within core resource areas of the City's SAP, are found in the City's General Plan Update and SAP. The City's General Plan Update directs that public access within open space areas be consistent with City's SAP. Under the City's SAP, recreational trails in the MHPA are considered a conditionally compatible use. Management directives given in the City's MSCP Subarea Plan for recreational trails in the MHPA include the following: locate trails in the least sensitive areas of the MHPA; use existing dirt roads as much as possible; do not locate trails wider than four feet in core areas or wildlife corridors; allow only passive recreational uses; no new trails should be cut through existing habitat; restore existing dirt roads and trails; and avoid vernal pool habitat and their associated watersheds. These management directives are the guiding principles that should be followed when designating recreational trails in the MTRP. Table 1 summarizes these management directives for recreational trail location, design and management within the MHPA, and specifically the area covered by the NRMP.

The Wildlife Agencies have recently been made aware by City staff that unauthorized trails have been apparently created, mainly by and for mountain bikers, throughout the MTRP. These unauthorized trails have impacted sensitive biological resources and threaten the MTRP's function as biological preserve in the City's MHPA. While not directly addressed in the City's SAP, appropriately located and managed mountain biking could be considered a passive and, therefore, conditionally acceptable use in the MTRP. However, the illegal creation and current high density of bike trails must be curtailed and corrected.

The Wildlife Agencies offer the following comments to assist the City in avoiding/minimizing impacts to sensitive biological resources and ensuring SAP compliance for the NRMP:

1. The MTRP planning area is located within a SAP core biological resource area and functions as important biological habitat in the eastern portion of the City. For these reasons, we recommend that impacts to habitat from any proposed improvements

^a Section 10.6 of the City's MSCP IA states that the City has" a requirement for the subsequent preparation and implementation of area-specific management directives (ASMDs), which shall be prepared in a phased manner for logical and discrete areas of land within the Subarea as those lands are committed to permanent preservation."

(e.g., trails, parking lots, and other public facilities) be minimized to the maximum extent practicable. Any proposed improvements should avoid all populations of covered species, and minimize impacts to sensitive habitats and wildlife movement areas consistent with the City's SAP. In addition, we recommend that all mitigation occur within the project boundaries, preferably within the same area as the proposed impact. If feasible, a larger area could be identified and used to mitigate upfront for all anticipated impacts from the proposed project. Off-site mitigation for any proposed impacts is not recommended due to the high sensitivity of MTRP and it being a core resource area for the City's SAP. Based on our meeting on May 17, 2013, it is our understanding that subsequent environmental review would be required for any project identified in the MPU that would result in impacts to biological resources.

2. MTRP is an important regional resource that attracts visitors county-wide. Management and monitoring of the usage patterns are essential to the long-term function of the preserve for biological resources and compatible public access. We recommend that both the MPU and NRMP include goals and measurable objectives using "SMART" criteria (i.e., Specific, Measurable, Achievable, Results-oriented, and Time-fixed) to monitor usage type/patterns and that the results of this monitoring be incorporated into adaptive management strategies for species contained in the NRMP.
3. The MPU (Section 5.6) includes a summary of how the City's SAP is incorporated into the goals and policies of the project. However, we recommend that this section (or another appropriate area within the MPU) include a description of how the NRMP relates to the MPU and MSCP. For example, it is our understanding that the MPU will provide the framework for land management and public access for MTRP and that the SAP ASMDs for the covered species (refer to Table 3-5 of the City's SAP) within the project area will be contained in the NRMP, which will be an appendix to the MPU. Together, both the MPU and NRMP will provide the necessary goals, policies and implementation tools to ensure that the land within MTRP is adequately managed for biological resources through an adaptive management strategy and also for compatible public use and access. In order for the City to more clearly demonstrate SAP compliance with the conditions of coverage for applicable covered species (i.e., those species which require ASMDs and which occur within MTRP), we suggest that the NRMP provide a section or a table summarizing the species requiring ASMDs and include a reference to the section (management action) of the NRMP that satisfies the requirement. We also recommend that the MPU include a summary analysis of how the goals and policies of the MPU are consistent with the General and Specific Management Directives found in the City's SAP for proposed public access/trails, parking expansion (e.g., CM-F1 and MG-F6) and those for East Elliott, Navajo (Cowles Mountain), and Lake Murray.
4. The northern portion of MTRP includes several parcels that have been used as mitigation for various local projects (e.g., Sycamore Landfill, MTRP horse staging facility, City's Habitat Acquisition Fund purchases). To the extent possible, any trail or public facility proposed under the MPU should avoid these areas. Where impacts cannot be avoided to these lands that served as mitigation, mitigation for impacts needs to occur at double the

normal ratio in order to account for the previous mitigation requirement and also provide mitigation for the current proposed impact.

5. The current language used throughout the NRMP (e.g. “should” and “recommend”) does not allow identification of those management actions that are required to be performed by the City, particularly the “Priority 1” MSCP directives that are necessary to maintain coverage for species under the City’s existing federal and state permits. Priority 1 actions should be clearly distinguishable from “Priority 2” actions that may be recommended as funding and resources become available. Although on an annual basis the appropriateness of implementing Priority 1 and 2 actions may be discussed with the Wildlife Agencies and evaluated in an annual work plan (subject to adaptive management considerations), the NRMP should clearly identify the City’s obligations to implement any “Priority 1” actions associated with the above-mentioned ASMDs pursuant to a science-based, adaptive management program.
6. We recommend that the NRMP provide more discussion of the enforcement actions that are currently being implemented (and any being proposed for future implementation) as they relate to trails and biological resources. Relevant information on existing ranger patrols (e.g., frequency, hours per day, volunteer programs, etc.) should also be included as this may assist in evaluating management needs relative to changing conditions (e.g., habitat conditions, public use patterns, competing priorities, etc.) over time. Additionally, any seasonal restrictions on public access needed to achieve species conditions of coverage should be clearly set forth in the MPU and NRMP. Similarly, key species/resource areas that may require close monitoring to determine if additional enforcement or seasonal access restrictions may be necessary should also be identified. Based on the Department’s experience with public access to sensitive biological areas, signage and enforcement are critical components of an access program that provides opportunities for the public to recreate in sensitive areas while maintaining the resource primarily for species and wildlife. Where the MPU proposes access beyond what is currently allowed, we recommend that, at a minimum, monitoring be expanded to determine if additional signage and/or enforcement are also necessary. Opportunities may also exist to partner with community groups and organizations to provide trained volunteer patrols.
7. The MPU (e.g., Section 5.5.5) includes numerous trail closures, reroutes, and construction of new trails for a net increase in total miles of trails within MTRP over existing conditions. The Wildlife Agencies would like to meet with the City to discuss the location, size, potential redundancies, and merit of any new trails or trail reroutes. Based on our May 17, 2013 meeting, follow-up site visits to the project area will be scheduled. We look forward to attending the site visit(s) with the City and may provide additional comments after we have the opportunity to meet. For proposed trail closures, we recommend that active restoration be included to the extent practicable and/or that materials from proposed trails construction (e.g., topsoil, brushed vegetation, etc.) be used to create visual and physical barriers to implement trail closures.

We appreciate the opportunity to comment on the MPU and NRMP. We are hopeful that further coordination with us will ensure the protection we find necessary for the biological resources that would be affected by this project. If you have questions or comments regarding this letter, please contact Randy Rodriguez (858-467-4201; randy.rodriguez@wildlife.ca.gov) or Kyle Dutro (858-467-4267; kyle.dutro@wildlife.ca.gov) of the Department; or Patrick Gower of the Service (760-431-9440; patrick_gower@fws.gov).

Sincerely,



Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



David A. Mayer
Acting Environmental Program Manager
California Department of Fish and Wildlife

Table 1. City of San Diego Trail Policies

DOCUMENT	POLICY No.	TRAIL POLICY
City of San Diego General Plan Update		
RECREATION ELEMENT	RE-D.7.	Provide public access to open space for recreational purposes. a. Provide public access into Multiple Species Conservation Program (MSCP) open space for only those recreational purposes deemed compatible with the preservation goals of the MSCP Subarea Plan.
	RE-F.5.	Utilize open space lands for outdoor recreation purposes, when doing so is compatible with cultural, historic preservation and MSCP conservation goals and surrounding land uses, including, but not limited to: <ul style="list-style-type: none"> • Locations of outstanding scenic, historic, and cultural value; • Corridors that link recreation facilities and open space areas such as utility easements, river and stream corridors, trails, and scenic highway corridors; and, • Sites particularly suited for park and recreation purposes, such as areas adjacent to and providing access to beaches, lakeshores, rivers, and streams.
	RE.F-7.	Create or enhance open space multi-use trails to accommodate, where appropriate, pedestrians/hikers, bicyclists, and equestrians. a. Maintain a citywide Trails Master Plan to guide the provision of and enhancement of open space multi-purpose trails. b. Enhance public access to public open space by clearly identifying trailheads and trail alignments which are consistent with MSCP preservation goals. c. Locate canyon and other open space trails to take advantage of existing pathways and maintenance easements where possible and appropriate.
CONSERVATION ELEMENT	CE-B.1.	Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities. a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.

DOCUMENT	POLICY No.	TRAIL POLICY
City of San Diego MSCP Subarea Plan		
GENERAL MANAGEMENT DIRECTIVES	Section 1.5.2	<p>"The following general management directives apply to all areas of the City of San Diego's MSCP Subarea Plan, as appropriate (page 52):"</p> <p>Public Access, Trails, and Recreation</p> <p><u>Priority 1:</u></p> <ol style="list-style-type: none"> 1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. <i>Lands acquired through mitigation may preclude public access in order to satisfy mitigation requirements.</i> 2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations. 3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood crossjoints, edge plantings of native grasses, and mulching of the trail. 4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley where other agreements have been made, in Mission Trails Regional Park, where appropriate, and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required. 5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300-500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired. 6. Off-road or cross-country vehicle activity is incompatible uses in the MHPA, except for law enforcement, preserve management or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate. 7. Limit recreational uses to passive uses such as birdwatching, photography and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes. 8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.

		9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.
DOCUMENT	POLICY No.	TRAIL POLICY
OVERALL AND SPECIFIC MANAGEMENT DIRECTIVES FOR THE NORTHERN AREA (FIGURE 13 - PRIORITY 1 ONLY)	Section 1.5.6	<p>Mission Trails Regional Park</p> <p><u>Priority 1:</u></p> <p>A Natural Resource Management Plan (NRMP) will be prepared for the park to preserve and protect natural resources while encouraging public use and implementation of the Master Development Plan. Coordinate the preparation of the NRMP with MSCP planners.</p> <ol style="list-style-type: none"> 1. Maintain and clearly demarcate trails around the visitors center and other areas of high public use to minimize habitat destruction. 2. Limit future equestrian trails to specified trails which minimize trail edge disturbances and are no greater than 25 percent gradient. 3. Seasonally restrict, if necessary, areas along the San Diego River, including riparian restoration areas (except along established trails) to prevent disturbance of breeding areas. 4. As envisioned by the Master Development Plan, revegetate areas with erosion or denuded slopes. 5. Incorporate adequate setbacks into future plans to develop an equestrian center near the San Diego River to minimize impacts associated with cowbird parasitism. Establish a cowbird trapping program to minimize effects on the least Bell's vireo and other songbirds. 6. Minimize lighting for the campground and collect garbage frequently to reduce nuisance wildlife (raccoons, opossums, skunks). 7. Establish signs to direct access and provide educational information at the periphery of sensitive resource areas and at points of access. Post signs to prohibit campfires, pets, firearms and camping (except where allowed). Also post road signs to identify wildlife corridors to help reduce road kills. <p><u>Priority 2:</u></p> <ol style="list-style-type: none"> 1. Reclaim active and abandoned mineral extraction areas as required by the State's Surface Mining and Reclamation Act of 1975.2.

Enclosure 2



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In Reply Refer To:
FWS/CDFW-SDG-13B0298-13TA0389

AUG 01 2013

Mr. Jeffrey Harkness
Park Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

Subject: Supplemental Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Draft Natural Resource Management Plan (NRMP), City of San Diego, California

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, appreciate the opportunity to conduct site visits with the City of San Diego (City) on June 4 and 25, 2013, to review and discuss the potential trail alignments and constraints proposed in the MPU. The Wildlife Agencies provided a comment letter on May 24, 2013, for the preliminary review of the draft MPU and NRMP. We understand the importance of this project to the City and would like to continue working with staff on refinements to project design, including identifying feasible measures to address unauthorized trail construction/use, while focusing on the goal to achieve project consistency with the Multiple Species Conservation Program (MSCP) and the City of San Diego's MSCP Subarea Plan (SAP). The supplemental comments provided herein are based on: information included in the draft MPU and NRMP preliminary project review meeting on May 17, 2013; the site visits; geographic information system (GIS) data provided by the City; our knowledge of sensitive and declining vegetation communities; and our participation in implementation of the MSCP and City's SAP.

The MPU serves as an update to the 1985 MTRP Master Development Plan to better reflect the following: (1) current status of the MTRP's development; (2) evolving requirements of environmental protection; (3) the potential expansion of the park to 9,700 acres with the addition of properties in East Elliot and West Sycamore; and (4) compliance with the City's SAP requirement to develop a NRMP. MTRP is a core biological area and regional wildlife corridor within the Multi-Habitat Planning Area (MHPA) established by the City's SAP and is managed to achieve the goals of the MSCP.

As stated in our preliminary comment letter, biological resources of concern within MTRP include coastal sage scrub, riparian scrub, and vernal pools. Within MTRP exist significant populations of willow monardella [*Monardella viminea* (*M. linoides* ssp. *viminea*)], San Diego thornmint (*Acanthomintha ilicifolia*), Orcutt's brodiaea (*Brodiaea orcuttii*), San Diego ambrosia (*Ambrosia pumila*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), least Bell's vireo (*Vireo bellii pusillus*), and coastal California gnatcatcher (*Polioptila californica californica*). The MTRP also includes mitigation areas and lands in the City's SAP MHPA, or preserve, used to fulfill MSCP conservation obligations.

In addition to the biological resource impact concerns and resource conservation and species protection guidance identified in our preliminary comment letter, we have the following supplemental issues for the City's consideration:

General Comments

1. The Wildlife Agencies acknowledge the difficulty to prevent unauthorized trail construction and use in MTRP, especially within the East Elliot core area, given current City park ranger staffing levels, overall visitor use, multiple points of access using existing utility access roads, and the patchwork of private land ownership and mitigation land in East Elliot and West Sycamore. However, based on our site visits, we believe the construction and use of unauthorized trails has far exceeded the level of impact anticipated by the MSCP which would qualify human recreation as a "compatible use" within the MHPA, has directly and adversely impacted sensitive biological resources, and threatens MTRP's function as a core biological area and regional wildlife corridor within the MHPA. We are especially concerned that the current level of management and enforcement directed to this area is not effective in addressing the unauthorized impacts to MTRP. On the site visit to MTRP, City staff stated that East Elliot is not regularly patrolled due to staffing constraints. Therefore, it is unclear if the City has the resources to proactively address the extensive unauthorized trail construction and use (particularly within East Elliot) with a focus on ensuring the long-term conservation value of MTRP. Our fundamental concern is the City's ability to effectively manage the biological resources in MTRP and possibly other MHPA preserves per conditions of the City's SAP and Implementing Agreement (IA), and thereby ensure preserves are conserved and protected in perpetuity.
2. The unauthorized construction and use of trails should be immediately addressed and effectively controlled prior to moving forward with plans to redesign or construct new trails in MTRP. In order to achieve this goal, the City should demonstrate the following: (1) all unauthorized trails and redundant trails/utility roads have been closed and are in the process of being successfully restored; (2) effective enforcement or other substantial measures have been initiated to curtail unauthorized trail construction and use; and, (3) measurable progress regarding the effectiveness of the enforcement or substantive measures. The City should outline its efforts to date that are in place to address unauthorized trail construction and use, including current staffing directed to patrolling

within affected areas, extent of community outreach events or public forums provided to raise public awareness (particularly with identifiable user base), posting of appropriate signage and/or erecting physical barriers to restrict unauthorized trail construction.

3. Based on the information provided in the draft MPU and NRMP, and the site visits, we are still unclear on what criteria are being used to determine whether an existing trail is authorized or unauthorized. Please provide the baseline documentation used to make this determination. Any trails, including user created trails, that were not part of the 1985 MPU should be considered unauthorized regardless of current use patterns or how long the trail has existed. The MPU should include a table detailing the total amount of approved trails, proposed trails, unauthorized trails, and closed trails. The table should also include proposed acres of impact and proposed acres of restoration by habitat type.
4. Please provide a project level map and associated descriptions (ownership, level of use, etc.) for all utilities/easements/access easements within MTRP. The MPU should indicate those utility access roads that the City has the authority to close and has actually committed to close and restore. We are available to facilitate discussions between the City and utility operators (e.g., San Diego Gas & Electric Company) regarding roads which are essential for operations and maintenance, can be designated for use by hikers/bikers, or can be closed for restoration.
5. Potential impacts from trail(s) within close proximity to rock faces that could result in wildlife impacts (e.g., raptor and bat species) should be thoroughly evaluated and adequate buffers should be provided in these areas. Access roads or trails adjacent to the buffer should be fenced to preclude human intrusion. Regarding bats, the City could consider incorporating bat houses in nearby areas (away from public access) to provide available habitat. We recommend a bat expert be consulted to evaluate impacts and provide specific direction for any enhancement actions.

Area Specific Comments

Fortuna Mountain/Mission Gorge Area

- There are numerous areas within this project segment where redundant trails and utility access roads exist. We recommend evaluating options consistent with the City's SAP to consolidate trails and to use existing utility roads to the maximum extent possible. A similar evaluation should be provided to other areas slated for constructing new trails.
- The Wildlife Agencies support several of the City's proposed reroutes in this area, particularly in order to avoid vernal pools and San Diego ambrosia populations. However, to be successful the City will need to undertake or coordinate a substantial enforcement effort to prevent continued use and habitat degradation outside of the designated trails in these areas. This may require efforts to control various points of access into this area.

- We are extremely concerned with a particular unauthorized trail that appears to run directly through a population of San Diego ambrosia that is located within the east Fortuna staging area (near Grassland Loop Trail). San Diego ambrosia is a narrow endemic species in the City's MSCP SAP; therefore, measures to protect this conserved population must be urgently developed and implemented. Additionally, it is important for the City to more promptly notify the Wildlife Agencies of unauthorized impacts occurring on this scale so that remedies can be identified and further impacts to conserved habitat minimized or averted.
- For sections of trail alignment that cross through riparian areas, we recommend either alignments that use existing access roads, and to the extent reasonable or feasible, rerouting trails outside of riparian areas.

Cowles Mountain Area

- The field visit clearly indicated that there is a very high level of public use, and substantial damage is occurring to habitat outside of the designated trail system. Given the deteriorated trail and habitat conditions observed on the south side of Cowles Mountain, at this time the Wildlife Agencies do not support the City's proposal to construct a new parking and staging area on the east side of Cowles Mountain as we believe that this would only exacerbate the situation by promoting additional uncontrolled access. Therefore, the City should demonstrate substantial progress to protect/recover the MSCP-designated conserved habitat, and to restrict human impacts to the existing approved/designated trails, before constructing new facilities.
- Due to uncertainties with protecting conserved habitat, restoring the existing designated trail, and restricting direct human impacts to the new trail, at this time we do not support rerouting the Cowles Mountain trail from Golfcrest Drive.

East Elliot Area

- The Wildlife Agencies are extremely concerned with the unauthorized construction and use of trails and the lack of routine patrols and ability to enforce trail regulations within the East Elliot core area. Therefore, the trail network within the East Elliot core area should be closed until the City can identify and implement an effective enforcement strategy to control the construction and use of the unauthorized trails throughout the area.

West Sycamore Area

- Due to the presence of willow monardella in several of the on-site drainages, we are concerned with any additional trails proposed in proximity to known populations of this species. Trail alignments that are routed near known populations will likely increase detrimental edge effects from trail use. As required by the MSCP, we recommend that the City prepare area specific management directives for our review to protect against

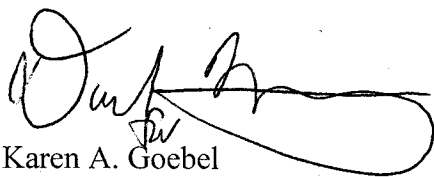
detrimental edge effects, including indirect effects from trail use.

- Given the number of utility roads that occur in this area, we recommend additional consideration be given to: consolidating designated trails; using existing dirt roads to the extent feasible; and restoring (actively or passively) trails which should be closed.
- Access roads we observed on our site visit were well beyond the widths that would typically be needed for public utility purposes. Therefore, access road areas beyond the minimum width necessary to serve for public utility purposes should be closed and restored to native habitat.

Lake Murray Area

- Although this general area is heavily urbanized, portions of the project extend into the City's MHPA. We are concerned with the City's proposal to establish a new trail within the area's last remaining high quality habitat located on the western edge of the lake, (which is occupied by the coastal California gnatcatcher). If the City commits to substantial restoration efforts within the Lake Murray area (including closures of some redundant trails/access roads), the new trail may be appropriate at a future date.

Our comments are intended to complement existing work the City has completed to date and to provide guidance as the MPU and NRMP proceed forward. We want to continue to work with the City on refining the project to address the concerns raised in both of our comment letters by resolving any potential conflicts between resource conservation and trail use within the MHPA. We are hopeful that our concerns can be adequately addressed prior to the forthcoming CEQA documentation prepared for the MPU and NRMP. We look forward to working with City on completing the MPU and NRMP. If you have questions or comments regarding this letter, please contact Paul Schlitt of the Department at 858-637-5510 or paul.schlitt@wildlife.ca.gov, or Patrick Gower of the Service at 760-431-9440 or patrick_gower@fws.gov.



Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Sincerely,



Gail K. Sevens
Environmental Program Manager
California Department of Fish and Wildlife

Enclosure 3



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In Reply Refer To:
FWS/CDFW-SDG-13B0298-14TA0247

APR 01 2014

Mr. Jeffrey Harkness
Park Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

Subject: Supplemental Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Draft Natural Resource Management Plan (NRMP), City of San Diego, California

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, appreciate the opportunity to provide additional preliminary comments on the draft MPU and NRMP, as discussed in our March 7, 2014, meeting with City of San Diego (City) Councilmember Scott Sherman. We understand the importance of this project to the City and would like to continue working with staff on refinements to project design, including identifying feasible measures to address unauthorized trail construction/use, while focusing on the goal to achieve project consistency with the Multiple Species Conservation Program (MSCP) and the City of San Diego's MSCP Subarea Plan (SAP). To that end, we have prepared maps (enclosed) showing draft trail designs for MTRP.

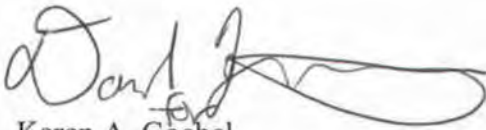
In preparing these trail designs, we applied the following management directives given in the City's SAP for recreational trails in the MHPA: locate trails in the least sensitive areas of the MHPA; follow existing dirt roads as much as possible; do not locate trails wider than 4 feet in core areas or wildlife corridors; allow only passive recreational uses; restore existing dirt roads and trails; and avoid vernal pool habitat and their associated watersheds. Although the management directives also state that no new trails should be cut through existing habitat, our designs include limited segments of new trails that would generally replace existing unauthorized trails that the City has deemed unstable/unsafe and allow for functional loops.

Further field review of these trail designs will be needed to ensure no sensitive resources would be impacted. For example, the new trail shown in Mission Gorge would need to be designed to avoid potential bat roosting areas. In addition, before any new trails could be constructed the

City would need to demonstrate that it has the resources and ability to curtail further unauthorized trail construction and to restore existing unauthorized trails. Overall, we believe these trail designs could be compatible with the City's SAP and should be included in the draft MPU and NRMP for public review and comment.

We look forward to working with City on completing the MPU and NRMP. If you have questions or comments regarding this letter, please contact Paul Schlitt of the Department at 858-637-5510 or paul.schlitt@wildlife.ca.gov, or Patrick Gower of the Service at 760-431-9440 or patrick_gower@fws.gov.

Sincerely,



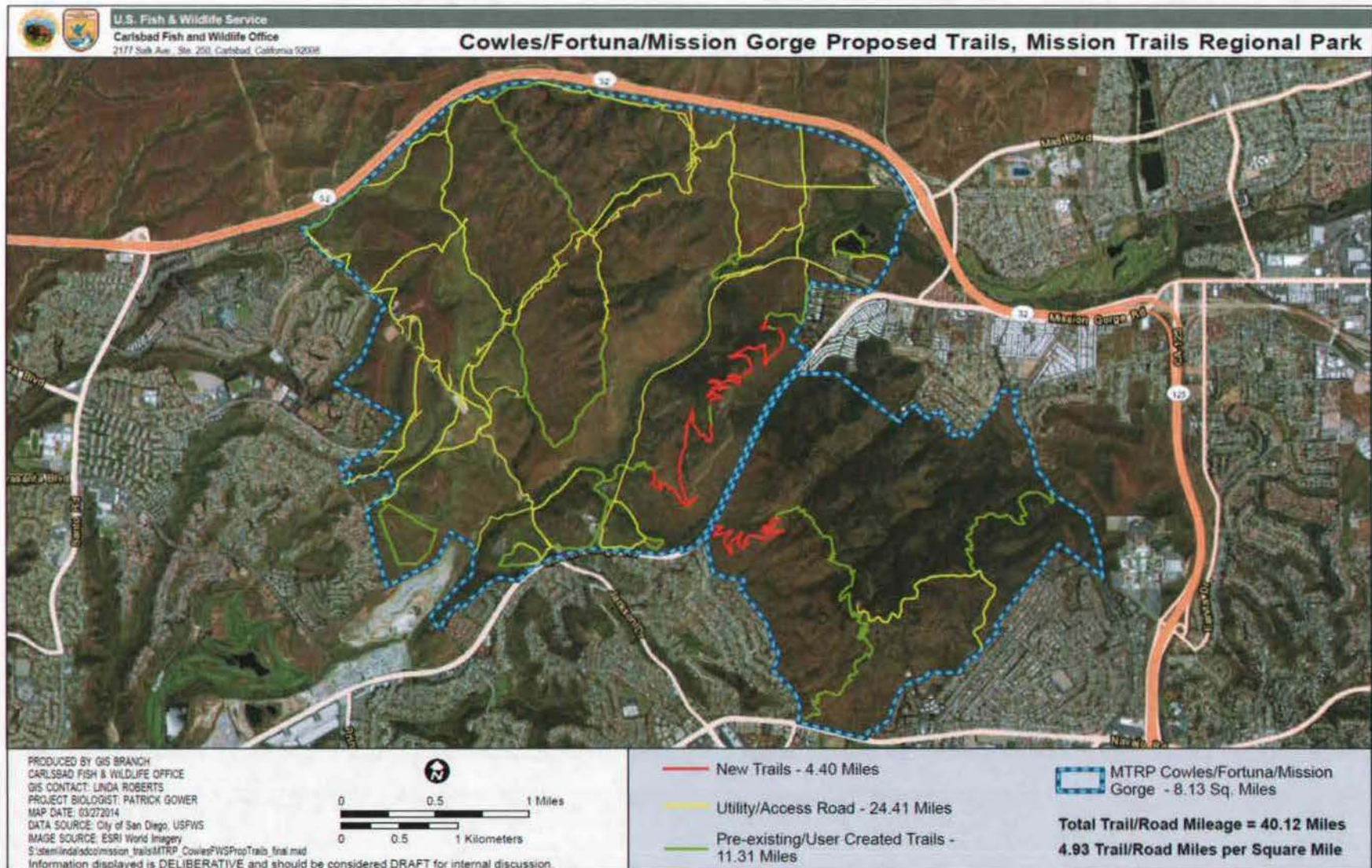
Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

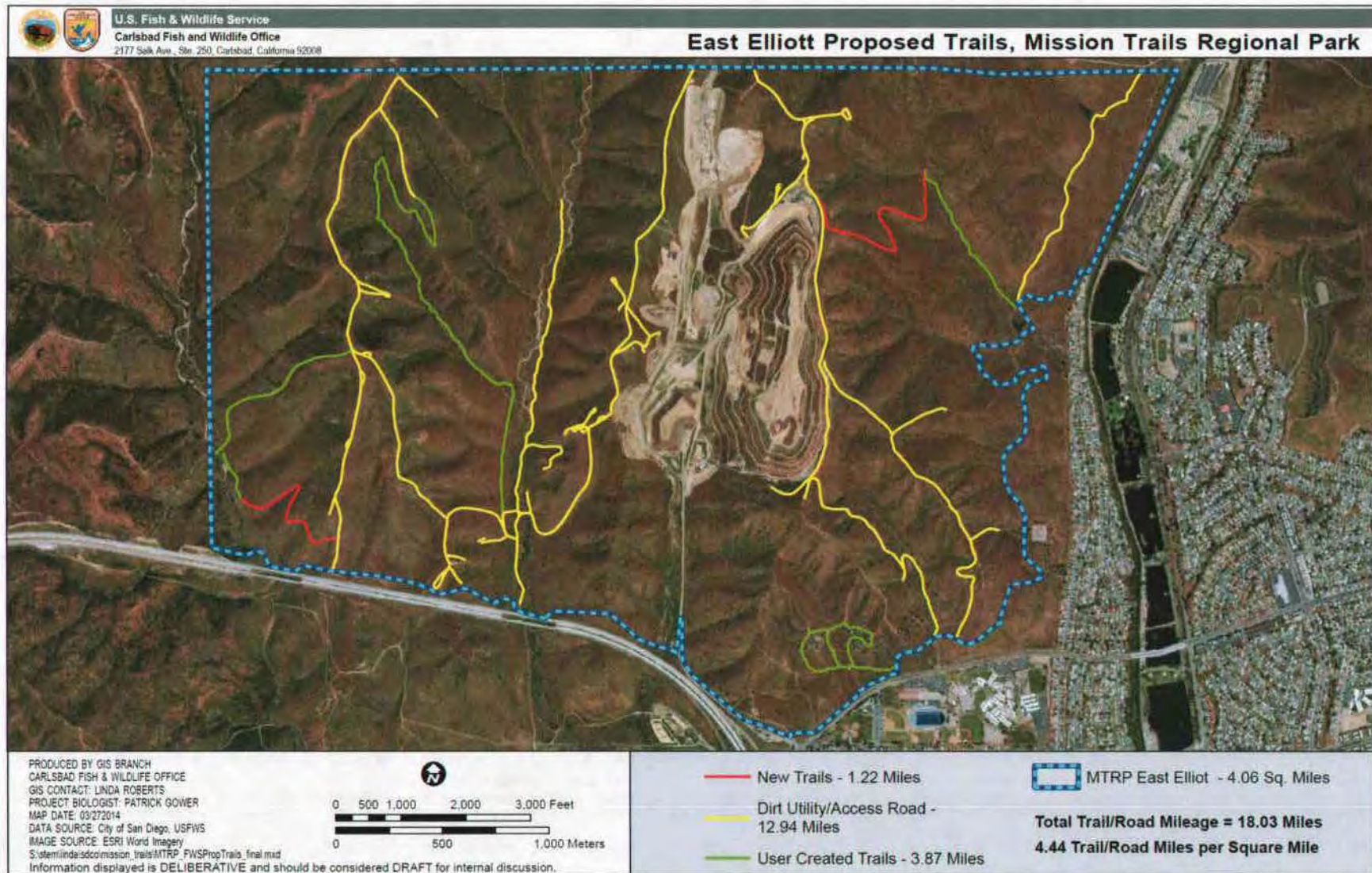


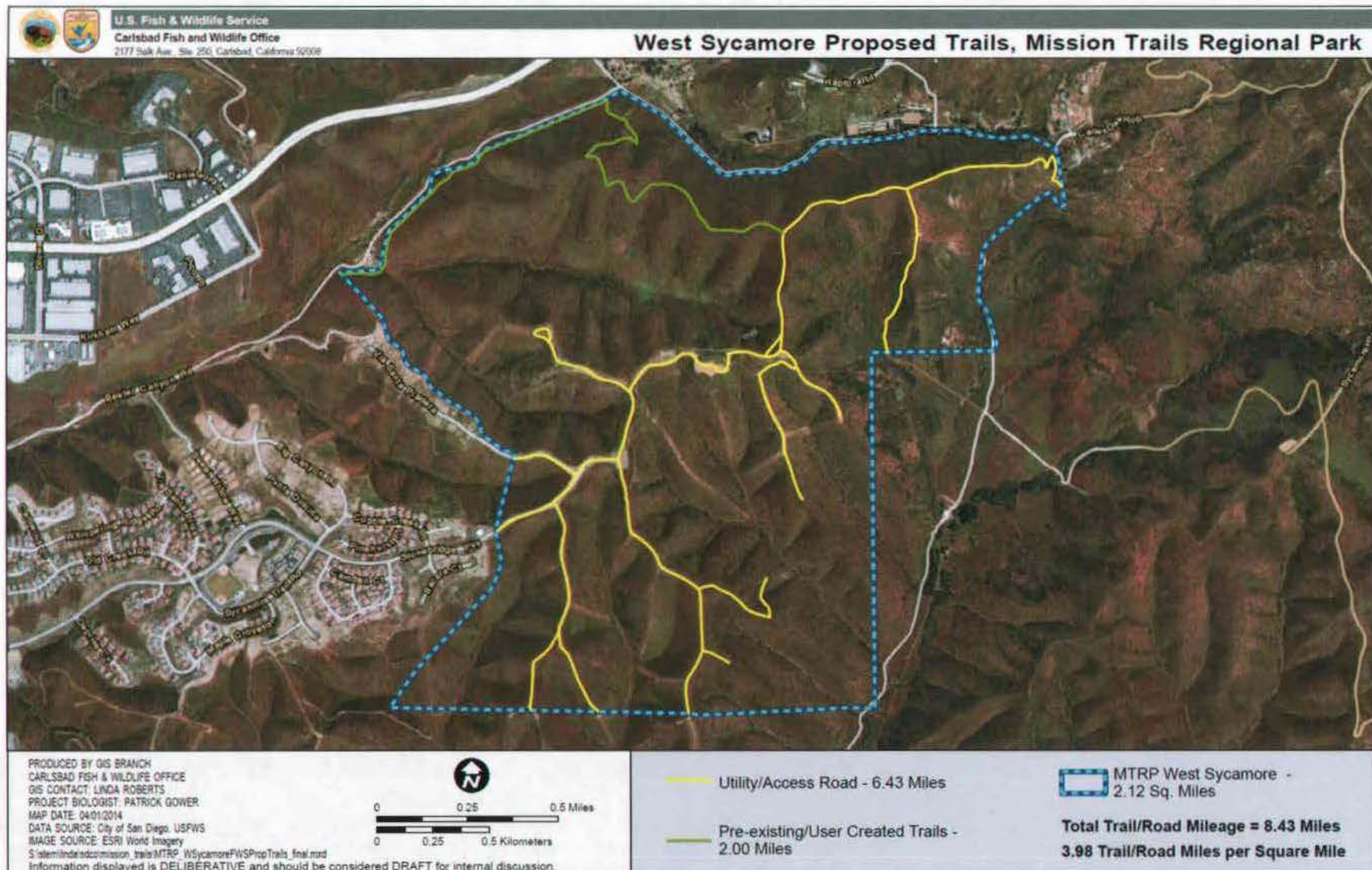
Gail K. Sevens
Environmental Program Manager
California Department of Fish and Wildlife

Enclosure

ENCLOSURE







Enclosure 4



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 01, 2014

Mr. Jeffrey Harkness
Park Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

Subject: Supplemental Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Draft Natural Resource Management Plan (NRMP), City of San Diego, California

Dear Mr. Harkness:

The California Department of Fish and Wildlife (Department) and U.S. Fish and Service previously submitted joint comment letters (dated May 24, 2013 and August 1, 2013) to the City of San Diego for the pre-public draft versions of the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resource Management Plan (NRMP). The following comments from the Department are intended to provide further refinement to the broader biological resource management concerns that were previously expressed in the joint agency letters. We have attached each of those comment letters for the City's reevaluation. Upon our review of the draft public versions of the MPU and NRMP, we continue to be concerned with the current trail design proposal for MTRP and the accompanying biological resource management that is being proposed in the NRMP. We hope the following comments and recommendations will further assist in the City's efforts to design of an effective trail system, while achieving the resource management and monitoring objectives prescribed under the City's Multiple Species Conservation Program Subarea Plan. We recognize that each of the documents are in draft form and will be further refined by the City based of public input. Following the City's revisions to the MPU and NRMP, the Department looks forward in assisting the City in subsequent document reviews.

2013 Mission Trails Regional Park Master Plan Update

2.8 MULTIPLE SPECIES CONSERVATION PROGRAM

First Paragraph – please define Wildlife Agencies in this introductory section

2.9.1 EAST ELLIOT

The discussion includes a statement that “future entrances will be from Mast Blvd. through the approved Castlerock development....” Please clarify the status of the litigation associated with the Castlerock development.

3.1.5.1 LAND USE POLICIES

The discussion mentions the intent of the City's MSCP Subarea Plan is to protect natural and cultural resources “while encouraging public use.” As acknowledged in section 3.3.6, “the popularity of Cowles Mountain has resulted in a trail system that may be pushing the limits of its carrying capacity if not already exceeding it.” Given the condition of that trail and other heavily

used trails throughout the park, has the City evaluated an acceptable level of public use on the trail network that it is responsible for managing? Furthermore, it would be beneficial for the Land Use Policies discussion to provide a clear definition of what will be considered passive recreational uses, including when a particular outdoor activity might no longer be considered passive (e.g. due to number of participants, intensity of the activity, time of day, etc.). For supplemental concerns on subject above, refer to *Comment #1* in the Wildlife Agencies letter, dated August 1, 2013.

Additionally, the discussion states "The planning and development of the San Diego River Park and Trail is guided by the City of San Diego River Park Master Plan." The Department previously expressed written concerns with the San Diego River Park Master Plan (SDRPMP) on the following issues: (1) City's lack of a completed a Natural Resource Management Plan for the San Diego River; (2) the absence of wetland buffer language with the SDRPMP (i.e., minimum 100-foot wide buffer, measured from the outside edge of the riparian habitat); (3) a need to address redundant trails proposed along both sides of the river; and (4) lack of consistency findings for the SDRPMP to the City's MSCP SAP. To date, we do not believe the aforementioned issues have been adequately addressed in the final SDRPMP that the City adopted; furthermore, we are concerned with any decision to apply resource management findings under the SDRPMP to being consistent with the MTRP MPU.

3.1.7.4 ELECTRICAL TRANSMISSION AND GENERATION

The discussion mentions that several San Diego Gas and Electric (SDG&E) electrical transmission lines traverse portions of MTRP. We recommend revisions to the discussion to include the proposed relocation of the 230 kilovolt (kV) transmission line that is a component for the proposed expansion for the Sycamore Canyon Landfill. Additionally, the pre-public draft version of the MPU referenced the proposed Quail Brush Generation Project. The current version of the MPU no longer includes a referral to this project. Please provide further clarification on the status of the project.

3.1.10.3 EXISTING CIRCULATION

One of the figures in this section includes a caption stating, "Example of Utility Access Road that is extremely steep making recreational use difficult." Please provide additional discussion on the maximum grades allowed under the City's trail design standards. Trail design standards are briefly addressed within section 5.1.3 of the MPU; absent are specific criteria to how and why a trail is placed within a particular location in the park. This information will be helpful to the Department in evaluating all of the proposed trails in the Plan. For supplemental concerns on the subject above, refer to *Area Specific Comments - Fortuna Mountain/Mission Gorge Area* in the Wildlife Agencies letter, dated August 1, 2013.

3.1.11 RECREATIONAL TRAILS

The discussion makes reference to "...about 22 miles of unauthorized user created trails within the park." Please provide discussion on whether the City has been able to determine the user base that has contributed to these unauthorized trails, and the reason for those trails, and how they may be addressed and prevented. Additionally, discussion should specify whether unauthorized trails are confined to only one area of the park or their extent elsewhere in MTRP. For supplemental concerns on the subject above, refer to *General Comment #2* in the Wildlife Agencies letter, dated August 1, 2013.

Table 3-2 Recreational Trails - Approximately 22.41 miles of *Unauthorized Trail* is reported in Table 3-2 (MPU) versus 32.429 miles of closed trail in Table 5-1 in Appendix F. Are the miles of *Unauthorized Trail* reported in Table 3-2 reflective of the same type of trail impact that is being reported in Table 5-1 in Appendix F (i.e., column heading Closed Mileage)?

3.1.14 SENSITIVE SPECIES

Two sightings of Quino checkerspot butterfly (*Euphydryas editha quino*) have previously been reported in MTRP. As the section of the MPU is currently silent on this subject, was any consideration given to evaluating the likelihood for Quino checkerspot butterfly occurring within the boundaries of MTRP?

Additionally, a reference to San Diego golden star (*Muilla clevelandii*) should be provided in this section, given this species is called out in the City's Biology Guidelines (i.e., "occupied habitat of listed species, narrow endemic species, *Muilla clevelandii* (San Diego golden star), non-native grassland occupied by burrowing owl, and all wetlands").

3.3.5 FACILITIES & USE

The discussion includes a statement that "Use of the mountain is limited to passive recreational uses, such as hiking, mountain biking, photography, nature study, viewing, and 'simply getting away'..." Depending on the intensity of mountain biking within a particular area, we believe the impacts to biological resources could be more detrimental in the long-term when compared to the other listed activities. Please provide further guidance of as to how the City currently distinguishes between a passive versus active recreational activity. (See also our comment under 3.1.5.1 above.)

3.7.3 BIOLOGICAL RESOURCES

Table 3-26: West Sycamore Sensitive Species - Willoway monardella is listed as *Monardella liniodes* spp. *viminea*. Suggest revising to *Monardella viminea*.

4.0.2 CONCEPT

Page 4-1 – The discussion includes a statement that "The Park will continue to protect environmental and cultural resources while providing for recreational opportunities." Given the varying level of recreational activities throughout MTRP (including more intensive visitation to the particular areas of the MTRP), we suggest the definition of "recreational opportunities" be refined. This should specify when the City will suspend a particular activity in the event the activity has been determined to be negatively impacting sensitive biological resources. For supplemental concerns on the subject above, refer to *Comment #2* in the Wildlife Agencies letter, dated May 24, 2013.

4.1.3.5 VEGETATION AND WILDLIFE

Accompanying the referral to "USFWS designated critical habitat areas", those species covered under that critical habitat designator should be provided for in this section of the MPU.

4.1.4 RECREATIONAL TRAILS PLANNING

Page 4-13 - The discussion provides a reference to the "City's Trail Policies and Standards"; however, we are unable to locate supplemental discussion in the MPU detailing the specifics of that guidance document. Is this document being included in the technical appendices?

The discussion states, "Trail corridors identified during the public input process were found to have the ability to be in compliance with MSCP Guidelines...." The Department feels it is very important that the discussion should define the minimum obligations for trail placement as

defined under the MSCP SAP; for example "focus should be placed on avoiding core resources (e.g., plant populations) to ensure compliance with species coverage obligations." Trails are deemed conditionally compatible under the MSCP SAP. For supplemental concerns on the subject above, refer to *Comment #6* in the Wildlife Agencies letter, dated May 24, 2013.

5. RECOMMENDATIONS

The first paragraph states, "In all cases, the City shall have oversight of all actions associated with this MPU." The MPU should identify the specific City Department's (e.g., P&R Open Space, Development Services Department) that will have the responsibility for implementing/enforcing the MPU, the mechanisms to be used, and the funding commitment.

5.1.3 MANAGEMENT RECOMMENDATIONS

We were unable to find any acknowledgement within this section of recommendations requiring coordination among City MSCP Planning staff and the Wildlife Agencies. This measure is important to ensure ongoing compliance with the City's MSCP Subarea Plan. Additionally, the listed Management Recommendations did not include whether options exist to co-locate trails with utility service roads. This issue was previously raised by the Wildlife Agencies during our review of the pre-public draft of the MPU (refer to *General Comment #4* and *Area Specific Comments -Fortuna Mountain/Mission Gorge Area and West Sycamore Area* in the Wildlife Agencies letter, dated August 1, 2013).

The section of Management Recommendations should acknowledge the resource damage that has occurred to date from unauthorized recreational activities. There should be a clear commitment to allocate funds and additional enforcement staff to ensure protection of biological resources within MTRP.

Recommendation #6 - A commitment for the timing (e.g., biannual) to meet should be provided instead of referencing "periodic". Furthermore, the management recommendations provided under this section are more recreational focused. We suggest the coordination meetings include Wildlife Agency staff in an effort to address and resolve ongoing resource management concerns that arise from impacts due to recreational activities.

5.1.5 FACILITY RECOMMENDATIONS

Facility Recommendation #9 - The condition should be amended to include a commitment to post areas of MTRP off-limits, including ensuring that postings are maintained on a regular basis.

5.1.6 HABITAT /SPECIES RECOMMENDATIONS

Recommendation #4 - The discussion should be expanded to include the following:
There are designated trails (within the SR52 Crossing) co-located within areas that have been identified as major and important wildlife movement corridors. Some of those trails have heretofore been used (despite not being official and thus not open at all) during nighttime hours for recreational activities. We suggest that supplemental wildlife movement studies be conducted for the north/south corridor from East Elliot/MCAS Miramar to the southern side of MTRP prior to considering placement of recreational trails in the area. Additionally, for those known wildlife movement corridors, a management recommendation should specify that no nighttime access will be allowed (including no lighting devices being allowed in these areas by either hikers or bicyclists).

Recommendations #21, #22, & #23 - The discussion should clarify the criteria for when an area will either be posted off-limits given the sensitive resources in the area, versus when fencing will be erected to cordon an area off-limits.

5.2 LAKE MURRAY

The first paragraph within this discussion should mention the presence of coastal California gnatcatcher (*Poliophtila californica californica*) within the area. For supplemental concerns on the subject above, refer to the *Lake Murray Area* subject heading in the Wildlife Agencies letter, dated August 1, 2013.

5.2.4 HABITAT/SPECIES RECOMMENDATIONS

LM-H1 - Guidance should be provided on additional evaluation to address minimum width requirement for utility service roads and whether options exist to restore some of the disturbed habitat along the service roads should any of the roads be reduced in width. For supplemental concerns on the subject above, refer to *General Comment #4* in the Wildlife Agencies letter, dated August 1, 2013.

5.2.5 RECREATION RECOMMENDATIONS

LM-R2 - Coastal California gnatcatcher occur within the area. The discussion should be amended to acknowledge that condition.

5.3 COWLES MOUNTAIN

The introductory discussion mentions a proposal to provide a new loop trail along the northeast slope of Cowles Mountain (extending off Big Rock Trail with the intent to reduce user congestion on the west side of Cowles Mountain). Given the existing condition of the trail network on the west side of Cowles Mountain, we believe a more thorough discussion is needed on whether an expansion of the trail network would likely result in expanding resource impacts to the north and east sides of the mountain, resulting in impacts to undisturbed habitat. For supplemental concerns on the subject above, refer to *Area Specific Comment – Cowles Mountain Area* in the Wildlife Agency letter, dated August 1, 2013.

5.3.2 MANAGEMENT RECOMMENDATIONS

CM-M1 - Given the proposed trail extending from Big Rock Park to Pyles Peak, we believe management recommendations should be included for additional ranger staff and patrols. This should include the City outlining its efforts to date that are in place to address unauthorized trail construction and use, including current staff directed to patrolling within affected areas.

5.3.3 FACILITY RECOMMENDATIONS

The pre-public draft version of the MPU listed the total number of parking spaces at this new facility, whereas the public draft no longer includes that information. Please provide the reason for removing that information. We prefer information be provided in the MPU on anticipated number of parking spaces.

5.4.1 PLANNING RECOMMENDATIONS

MG-P2 - The recommendation states "Ensure that trail linkages through the park are made as shown in the San Diego River Park Draft Master Plan." The Department previously expressed concerns with the City not completing a Natural Resource Management Plan (NRMP) for the San Diego River Master Plan. (See our comments above regarding Section 3.1.5.1.) Any subsequent trails discussed under recommendation MG-R1 should include adhering to resource management goals prescribed under an **adopted** NRMP that has been reviewed by the Wildlife Agencies.

5.5 FORTUNA MOUNTAIN

Second paragraph - Please provide additional discussion regarding the meaning to "providing passive recreational opportunities." Are there new opportunities that are being evaluated for MTRP?

5.6.1 PLANNING RECOMMENDATIONS

EE-P4 - The recommendation states "Assess the need for a regional scale staging area for East Elliot as land ownership and public use within the area increases." Given the existing parking lot at the equestrian staging area, is there still a need for another staging area?

5.6.5 RECREATION RECOMMENDATIONS

Item EE-R20 - The recommendations include a trail proposal that would extend from the bottom of Spring Canyon up to the eastern slope of the canyon and then trend to the northeast side of the Sycamore landfill. We are concerned with the proposed location of this trail based on the proposed expansion footprint of the landfill and obligations to relocate the existing SDG&E 230 kV transmission line along the west side of the landfill. Placement of a trail would further the Department's concerns on the effects to wildlife movement through this portion of Spring Canyon, which is an important and major wildlife corridor (See our supplemental comments in section 5.1.6 regarding night access).

6. IMPLEMENTATION

The discussion does not mention where it envisions either the role or involvement of the Wildlife Agencies as the MPU moves forward. Please provide further clarification on this matter. Additionally, the discussion does not provide definitive guidance on needs/obligations for supplemental enforcement staff to ensure the successful implementation of the MPU. For supplemental concerns on the subject above, refer to *Comment #2* in the Wildlife Agencies letter, dated May 24, 2013.

2013 Natural Resource Management Plan for Mission Trails Regional Park

Acronyms

Page VII – Please revise "California Department of Fish and Game" to "California Department of Fish and Wildlife".

1.0 Introduction

Page 1-1 - Recommend revising Multi-habitat to Multi-Habitat.

2.1 Environmental Setting

Page 2-1 – The environmental setting discussion states, "The existing trail system at MTRP is currently being reevaluated and revised in the Master Plan Update associated with this NRMP." The Department would emphasize that written comments were submitted by the Wildlife Agencies to the City during the pre-public draft review of the NRMP; however, in evaluating the current draft, we found minimal incorporation of the Wildlife Agencies' recommendations and minimal revisions. We respectfully request that these comments be addressed and consider their incorporation at this time.

2.2.4.1.1 The Wildlife Tunnel

The discussion states "A total of seven wildlife undercrossing choke points beneath SR-52 have been identified and are crucial to limiting the effects of habitat fragmentation to a number of species." Additionally, the discussion states "Of these seven crossings, only two (Oak Canyon uncrossing and Spring Canyon Bridge undercrossing) are considered viable movement

corridors for large mammals.” Currently, the analysis is limited to identifying some of the constraints/deficiencies associated with these crossing, along with only some of the governmental entities (e.g., California Department of Transportation) responsible for maintaining existing infrastructure. The analysis should identify all parties responsible for maintaining the existing infrastructure (including joint responsibilities, if applicable) and where partnerships potentially exist to improve conditions with a particular wildlife crossing. Also, the discussion should include direction on whether minor improvements could be provided to some of the less viable crossings so as to better facilitate wildlife use (including the scale of improvements necessary to make them viable for wildlife).

The discussion should acknowledge the recreation-related impacts from mountain biking and effects to known wildlife movement corridors/crossings within the East Elliot (see our supplemental comment under MPU Section 5.1.6).

2.2.4.1.6 San Diego River Course

The discussion states, “As corridor constraints at the San Diego River course lie beyond the MTRP boundaries, no park management of the San Diego River course is recommended.” We acknowledge the City’s limited authority to manage issues beyond the boundaries of MTRP; however, we believe it is still appropriate to provide an overview of resource management along the San Diego River corridor and where the City is able to commit to aid in the recovery of the San Diego River corridor. For example, the City is identified as a partnering entity with the San Diego River Conservancy. It is important for the City to highlight the benefit of existing partnerships and other collaborative efforts to date that have focused on the broader resource management concerns along the San Diego River corridor.

3.2 Multi-Habitat Planning Area Guidelines for MTRP

Page 3-2 – The discussion refers to pertinent sections from the City’s MSCP SAP and MHPA compliance guidance that will be important for the MTRP MPU and NRMP. In considering the specific guidelines provided for the Eastern area under the MSCP SAP, condition B14 states, “upon cessation of extractive uses, the site should be reclaimed/restored for open space.” This same condition is identified as a Priority 2 for Mission Trails Regional Park (1.5.6 Specific Management Directives for the Eastern Area). This section of the NRMP should be amended to recognize this obligation.

Priority 1 (MSCP required directives)

Directive #9 includes specific management measures to protect and enhance existing populations of the San Diego ambrosia. In reviewing the similar discussion provided in section 4.2.2.5 it would be beneficial to include the priority level associated with each trail closure (i.e., FM-R49).

In addition to the priorities listed in this section of the NRMP, we recommend a discussion of how the City will integrate the habitat restoration component to address closure of unauthorized trails, trail reroutes, and construction of new trails. For supplemental concerns on this subject, refer to *Comment #7* in the Wildlife Agencies letter, dated May 24, 2013.

4.1.2 Threats to Biological Resources at MTRP

Table 4-2 - San Diego fairy shrimp is identified as not being MSCP covered. The species is covered per the CDFW NCCP.

Both Table 4-2 and Appendix A-B list Hermes copper butterfly (*Lycaena hermes*) being observed within MTRP. At the time of that observation, were any larval host or adult nectar plants documented in the area and were these areas revisited and mapped? If so, that information should be carried forward into the respective management guild that covers that species.

4.1.2.1 Preserve-level Threats

Along with the preserve-level threats that are identified in this section of the NRMP, we believe the Sycamore Canyon landfill expansion project needs to be discussed in the NRMP. Currently, the acknowledgement of that project is limited to a reference in Table 4-8. We recognize the expansion of the landfill is confined to areas previously “white-holed” under the MSCP SAP; however, the increase in footprint has a potential for indirect impacts to surrounding MHPA (e.g., willowy monardella populations, wildlife movement patterns along the west side).

4.1.2.1.1 Human Use of Reserves

This section should identify the current issues associated with unauthorized construction of trails within MTRP and how this will affect implementation of the NRMP.

Additionally, this section of the discussion states “...and having a clear patrol and violation enforcement strategy can help reduce some of the risks posed by recreation.” The NRMP needs to include guidance of the specific enforcement strategy that is in place and modifications to the strategy that will effectively deal with unauthorized activities in MTRP. The Wildlife Agencies expressed concerns on this subject during the pre-public release of the NRMP. We do not believe that this subject has been sufficiently examined in the NRMP public draft. For supplemental concerns on the subject above, refer to *Comment #6* in the Wildlife Agencies letter, dated May 24, 2013 and *General Comments #1 and #2* in the Wildlife Agencies letter, dated August 1, 2013.

4.1.4 Management Prioritization

Table 4-5 lists “River Terrace Grasslands” as one of the six management guilds being developed in the NRMP. In reviewing other sections of the NRMP (e.g., Section 4.3 Priority Management Guilds at MTRP) we were unable to find the specific discussion identifying that guild. Additionally we are unclear whether the River Terrace Grassland guild boundary is intended to cover the entirety of native grassland that was mapped in MTRP. According to Table 4-5, 17.2 acres of native grasslands are mapped within the NRMP. We consider native grassland a critical resource component (including associated wildlife species that it supports) meriting its own management element. Please provide guidance on this subject and where opportunities exist for restoration of this habitat.

Table 4-5 - Correct “Tierra Santa” to “Tierrasanta”

4.2.1.5 Management Goals and Objectives

The Wildlife Agencies provided comments during the pre-public draft review of the NRMP requesting guidance on those management actions that will be performed by the City. The language used throughout the NRMP includes “should” and “recommend”, in association with management goals and objectives (e.g., sections 4.2.1.6, 4.2.1.7, and 4.2.2.5). A commitment by the specific City Department that will be responsible for implementing a particular management goal/objective needs to be provided for all applicable sections of the NRMP. Additionally, the NRMP should provide supplemental discussion on consideration and adoption of the management and biological monitoring objectives developed by the San Diego Management and Monitoring Program (SDMMP) in its Management Strategic Plan, including

where the NRMP might benefit in better coordinating management and monitoring efforts developed under SDMP. Currently, the analysis is silent on this subject. For supplemental concerns on the subject above, refer to *Comment #5* in the Wildlife Agencies letter, dated May 24, 2013.

Objective 3: One of the objectives states, "Treatment of exotic weeds within unoccupied habitat within Area D should be initiated when absolute exotic weed cover exceeds 25 percent." Please provide supporting evidence on the basis to not treat exotic weeds until absolute weed cover exceeds 25 percent. The Department prefers the NRMP include a preserve exotics treatment plan that targets the most aggressive weeds for removal, or focuses on areas with the most sensitive species at risk.

Objective 4: The technical appendices should include specific information of the location of each utility easement within MTRP. Additionally, the objective should be refined to specify the timing for when fencing will be accomplished. The Wildlife Agencies previously requested that the NRMP include a project level map and associated descriptions for all utilities/easements/access easements within MTRP. The NRMP should identify the utility access roads that the City has authority to close and has actually committed to close and restore. For supplemental concerns on the subject above, refer to *General Comment #4* in the Wildlife Agencies letter, dated August 1, 2013.

4.2.2 San Diego Ambrosia (*Ambrosia pumila*)

4.2.2.1 Background - The discussion does not specify the types of management measures that have been implemented to date for San Diego ambrosia. Please provide additional discussion on this issue within this section of the NRMP.

4.2.2.4.3 Recreation Activities – Trampling

The discussion states "Trampling threats to San Diego ambrosia have been controlled at MTRP with a combination of signage, trail control, and fencing, with regular patrols required for maintenance and repair due to weathering and vandalism." The Wildlife Agencies previously identified an issue with an unauthorized trail extending through a subpopulation of San Diego ambrosia along the Grassland Loop Trail. Please discuss the measures taken to date to reduce the impact to this subpopulation of San Diego ambrosia. For supplemental concerns on the subject above, refer to *Area Specific Comments - Fortuna Mountain/Mission Gorge Area* in the Wildlife Agency letter, dated August 1, 2013.

4.2.2.5 Management Goals and Objectives

Objective 1- Please provide additional discussion on the timing/schedule of treatments that will be directed to address exotic annual plant species affecting existing populations of San Diego ambrosia in MTRP.

Objective 2 - The management objective identifies that a small population of San Diego ambrosia should be fenced or exclusionary signage posted to discourage transit through subpopulation A (Figure 4-8a). Similarly, Figure 4-5 identifies a trail extending through a population of San Diego ambrosia. This area needs to be immediately fenced to protect this subpopulation.

Objective 4 - The management objective does not discuss whether transplanting is proposed to address the prior impacts documented to San Diego ambrosia.

Figure 4-8a - The legend includes existing trails depicted as either Hiking Trail, Hike/Bike Trail, Multi-Use Trail and Class I Multi-use Path. Please provide the corresponding document that defines the specific design criteria and purpose for each trail type.

4.2.2.6 Monitoring

The monitoring discussion should describe the timeline for monitoring each core population of San Diego ambrosia.

4.2.3 Variegated Dudleya (*Dudleya variegata*)

The pre-public draft version of the NRMP included a photograph of San Diego ambrosia, whereas the public draft no longer includes a species photo. Suggest including the photograph within the NRMP.

4.2.3.3 Presence within MTRP

The discussion should be amended to highlight the variegated dudleya that was transplanted as part of the Sycamore Landfill expansion project. A portion of those plants that were translocated are located within the City's MHPA. The figure showing known locations of variegated dudleya should also be amended to include that restoration site.

4.2.3.5 Management Goals and Objectives

Objective 1: Accompanying the commitment language to update baseline surveys for all conserved populations of variegated dudleya, the measure should also specify the timing that surveys will be initiated. Additionally, please provide supplemental justification associated with the reference for not surveying for another ten years.

Spelling should be corrected for "phonologies" to "phenologies".

4.2.4.5 Management Goals and Objectives

Figure 4-18a – One of the proposed trail locations appears to extend through a species point for willow monardella. Please provide additional discussion on proximity of this trail to species occurrence. If the City has developed a proposal for providing protective buffers to these populations, please provide supplemental discussion to the basis for establishing a given buffer.

Objective 1: Please provide further clarification to the specific type(s) of "anthropogenic inputs" that are mentioned under this objective.

Objective 3: Trail Reroute & New Trail Impact Minimization - A clear commitment (as opposed to "recommend") should be included under this objective to ensure all of the management measures for willow monardella are implemented at final trail design. For supplemental concerns on the subject above, refer to *Comment #5* in the Wildlife Agencies letter, dated May 24, 2013.

Objective 4: Exclusion Fencing/Signage - Along with erecting exclusion fencing and signage, the objective should specify the amount of staff dedicated to patrol the areas.

4.2.5 Coastal Cactus Wren (*Campylorhynchus brunneicapillus couesi*)

4.2.5.1 Background - Revise CDFG to CDFW

4.2.5.5 Management Goals

Figure 4-22 - The figure depicts a multi-trail re-route that parallels the existing service road. Please provide discussion on whether any consideration was given to co-locating trail with the service road.

Objective 2: The proposal to enhance and expand cactus distribution and density should be evaluated for the following: 1) minimum habitat patch size to support wrens in the long-term and; 2) determining juvenile dispersal distances so restoration sites are located close enough to source populations.

Objective 3: Trail Reroute – Will any cactus restoration occur within the areas closed?

4.3.1 Cliffs and Rocky Outcrops

Was any review of Pyles Peak conducted along with the other *Cliffs and Rocky Outcropping Management Guilds* covered within this section? For example, determining the suitability of the roosting areas for raptors at Pyles Peak?

4.3.1.5 Management Goals

Objective 2: Ranger Patrols - The existing colonies of bats are active year-round at both quarry locations (note 2 pairs of 2 quarries), therefore the proposed intervals for patrolling the area by rangers should be conducted year-round basis.

4.3.1.6 Monitoring

The timing and methodology for supplemental monitoring for sensitive species observed within the Cliffs and Rocky Outcropping Guild should be identified within the monitoring discussion. We recommend further inventorying of bat species using acoustic monitoring in order to provide a more thorough assessment of species assemblages and relative abundance (at all known locations within MTRP), as opposed to relying solely on Park Rangers' observations to drive management actions. We also recommend issuing warnings/citations of unauthorized recreational activities within sensitive roosting sites. We suggest the City consider the long-term monitoring strategies outline in prior bat inventory work conducted by the U.S. Geological Survey (Stokes et al. 2005. Bat inventory of the multiple species conservation program area in San Diego County, California. U.S. Geological Survey final report prepared for the County of San Diego and California Department of Fish and Game. San Diego, CA. 97 pp.) For supplemental concerns on the subject above, refer to *General Comment #5* in the Wildlife Agencies letter, dated August 1, 2013.

4.3.2.4.2 Invasive Non-native Species

In evaluating the monitoring and management goals provided in section 4.3.2.5, it is unclear the level of the treatment that will be conducted in this guild to address invasive non-native species. Given the NRMP does not provide individual management for all MSCP covered species, we believe it is important that other management measures be carried out to ensure supporting habitat continues to be provided for those species not captured under individual treatment (e.g., controlling dense exotic annual plants to improve conditions for coast horned lizard). Furthermore, this would result in better meeting the commitment for providing Area-Specific Management Directives (ASMDs) for MTRP.

4.3.2.5 Monitoring and Management Goals

Objective 1: The objective states, "...new trail use within the guild boundaries will be minimized and trail redundancies will be eliminated or rerouted around Management Guild areas when possible." Please provide the criteria for when a trail would not be relocated. There should be a

prioritization measure within the NRMP. Furthermore, the management goals should specify that trails shall not be located within those core plant population areas. Absent that acknowledgement, we are unclear how the NRMP adequately addresses detrimental edge effects.

Objective 3: Given the acknowledgement that sensitive plant surveys have not been conducted within the East Elliot area since 2001, has the City committed to a particular time when sensitive plant surveys will be conducted?

4.3.3.3.4 San Diego Golden Star

The discussion is limited to stating "Area-specific management directives must include specific measures to protect against detrimental edge effects." Please provide a cross-reference to the section in the NRMP that details the monitoring and management goals for this plant. Additionally, potential edge effects associated with the expansion of the Sycamore Canyon Landfill on known populations of San Diego golden star should be evaluated as part of the ASMDs. This should include continuing long-term monitoring of those transplanted populations of golden star (associated with mitigation obligations for the landfill expansion) for the purpose of determining the overall effectiveness of this measure as an adequate means of mitigation.

4.3.3.5 Management Goals

Object 3: The final Vernal Pool MMRP should be included as a technical appendix to the NRMP.

4.3.4.2 Membership Rules

Figure 4-29 - The boundary of the riparian woodland guild is primarily defined by the San Diego River corridor (including Kumeyaay Lake) and critical habitat for the least Bell's vireo (*Vireo bellii pusillus*). There are ephemeral drainages within other sections of MTRP that support some of the sensitive species identified within the riparian woodland guild boundary (Table 4-16). We are unclear how some of those species are being addressed within the NRMP given the lack of acknowledging ephemeral drainages and associated sensitive species within these areas. Please provide provided additional discussion to address this issue.

4.3.4.3.2 Least Bell's Vireo

This section should include the minimum upland buffers that will be established along the river corridor. This same condition should be provided for southwestern willow flycatcher (*Empidonax traillii extimus*) breeding habitat (i.e., section 4.3.4.3.3). The ASMD should include information on the status of the breeding population and steps taken to provide adjacent upland habitat buffers and successional habitat for all known populations of least Bell's vireo within MTRP. Additionally, management goals should identify the type/level of coordination the City currently has with other entities that manage/monitor this species.

4.3.4.3.4 Belding's Orange-throated Whiptail

Instead of defining that "Area-specific management directives must address edge effects", the discussion should specify the level of management/monitoring that will be provided for whiptail. For example, are forthcoming monitoring efforts being considered for whiptail and other reptiles (e.g., establishing pit-fall trap arrays for upland reptile species)? We have reservations with the discussion to defer to County of San Diego survey results for this species (per Section A-C.1.5) and inferring the likelihood for this species to occur within MTRP. The broader obligations for maintaining coverage of the species under the MSCP needs to address those commitments to manage and monitor for the species within designed preserve areas (e.g., examining prey source for whiptails, effect of drought, increase of annual grasses within preferred habitat).

4.3.4.4.2 Invasive Non-native Species – Giant Reed

The management measure is limited to removal of giant reed (*Arundo donax*). Are there additional non-native species that will be targeted for removal and is there a schedule for when the riparian corridor will be surveyed for non-native species?

4.3.4.5 Monitoring and Management

Given that Kumeyaay Lake was mapped within riparian woodland guild, were any potential invasive species issues being evaluated for management with the lake (e.g., aquatic weed species, quagga mussels, non-native turtles). Additionally, to what level has MTRP management had to contend with vector control issues within Kumeyaay Lake or within the riparian corridor?

4.3.5.3.2 San Diego Golden Star

Refer to comment provided under section 4.3.3.3.4 for specific management concerns.

4.3.5.5 Monitoring and Management Goals

Has an evaluation been conducted on the need for treatment of other invasive species within the West Sycamore area?

5.0 Budget and Schedule

The budget and schedule overview cites “recommended tasks.” Please quantify the commitment from the specific City Department for completing each of the defined tasks. Are each of the tasks ranked by priority and where are they ranked according to other open space lands that the City is responsible for managing? The list of tasks predominantly has a monitoring focus, where does enforcement related tasks fit into the current budget?

We recommend that the Budget and Schedule include specific measures that address habitat restoration should anthropogenic related impacts occur to sensitive biological resources. For example, there are numerous unauthorized trails that have been constructed that may have resulted in impacting biological resources (as identified under guild management area). Please provide additional guidance how the Budget and Schedule account for this issue or will be amended.

We recognize the benefit of baseline surveys and the threat assessment that is listed under the task column; and, accompanying a particular monitoring need we believe there is immediate management need for species and associated habitat. For example, protecting ambrosia populations or implementing restoration for areas that have been neglected or impacted by unauthorized trail construction.

Appendix A-C Sensitive Species at MTRP Not Selected for Individual Management

1. Orcutt's brodiaea (*Brodiaea orcuttii*) should be added to Table C-1.
2. Some of the plant and animal analysis provided under Section A-C.1 defers to the review of data points compiled from the California Natural Diversity Database (CNDDB). The Department would highlight that the CNDDB is a statewide inventory, managed by the Department, and is routinely updated with the location and condition of the state's rare and declining species and habitats. Although the CNDDB is a reliable tool for tracking occurrences of special status species, it contains only those records that have been

reported to the Department, and does not replace the need for timely physical surveys. Species may occur without being reported in CNDDDB. Therefore, we would caution drawing conclusions based on the known extent of sensitive resources within CNDDDB and tailoring management decisions, absent site-specific surveys.

3. Table C-1 references southwestern pond turtle (*Emys marmorata*) as one of the MSCP species not selected for individual management, based on the rationale that "Lake Murray contains high degree of edge effects. Regional conservation efforts focused on high-quality habitats". Further analysis provided on this subject in section A-C.1.4 cites, "There is very little habitat within the MTRP that is potentially suitable to support southwestern pond turtle". According to the prior species assessment conducted by the USGS (Madden-Smith et al. 2005. Distribution and status of the Arroyo toad (*Bufo californicus*) and Western pond turtle (*Emys marmorata*) in the San Diego MSCP and surrounding areas. U.S. Geological Survey final report prepared for the County of San Diego and California Department of Fish and Game. San Diego, CA. 183 pp.) for southwestern pond turtle, the following habitat quality ratings were provided: 1) Lake Murray – high [human access – high]; 2) Kumeyaay Lake - marginal [human access – high] and; 3) MTRP/San Diego River –high [human access – high]. Please provide supplemental discussion on the level of site-specific surveys that has been conducted since the 2003 USGS habitat findings that would support removing this species from further management consideration in the NRMP. Currently, there is no recognition of southwestern pond turtle within the riparian woodlands guild discussion.
4. Section A-C.1.8 references southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) as a CDFG Species of Special Concern. Please revise CDFG to CDFW. Additionally, the Santa Cruz Island Rufous-Crowned Sparrow (*Aimophila ruficeps obscura*) is not identified as California Species of Special Concern. Currently, *Aimophila ruficeps canescens* is listed by the Department as a "Taxa to Watch" on the basis of prior concern for the well-being of their populations in California.
5. Section A-C. 1.10 cites the decision to not provide individual management actions for northern harrier on lack of suitable habitat or the species not observed during 2010 field work or known sightings in CNDDDB. Please note that during our site visit (3/14/14) of the East Elliot area, we observed one northern harrier (*Circus cyaneus*) foraging within the Grassland Trail area of MTRP. Please also see our comment regarding sole reliance on CNDDDB in comment 2 above. Additionally, we would direct attention to the Final Report - NCCP/MSCP Raptor Monitoring Project prepared by Wildlife Research Institute for the California Department of Fish and Game (March 31, 2005). That report highlights monitoring of raptors as a critical component of the MSCP, included northern harrier. We believe the MTRP NRMP could benefit by incorporating the monitoring approach prescribed in this monitoring report.

At a minimum, Appendix A-C needs to identify the ASMDs for each species as specified in the MSCP SAP. Along with citing ASMD obligations, the steps taken to meeting each directive need to be provided in the NRMP, as opposed to providing a blanket statement that area-specific management directives must address edge effects. The specific steps to accomplish each ASMD should be more defined. For supplemental concerns on the subject above, refer to *Comment #2* in the Wildlife Agencies letter, dated May 24, 2013.

6. Appendix A-C provides a partial case for the decision to defer individual management for 16 sensitive species; however, absent from the discussion is the timing/schedule for when an evaluation of each of the species will be revisited for individual management treatment. The rationale provided in the analysis to defer management relies partially on species protection via management actions provided to its respective guild. However, when referring back to a respective guild (e.g., Riparian Woodlands/least Bell's vireo) the timing commitment to implement each measure is not specified. Given the extent of recreational pressures imposed on resources within certain areas of MTRP, we believe a clear commitment on the timing/schedule to reevaluate management obligations for each of the species is needed, prior to the NRMP being finalized. According to Section 1.0, one of the specific objectives of the NRMP is to develop an adaptive management framework that addresses the identified threats and ensures long-term, viable populations of these species within MTRP. That level of commitment is needed to be supported within each of the species covered by the NRMP.

We look forward to the City considering our comments, along with each of the resources management issues expressed in the Wildlife Agencies' prior two letters. We are hopeful that the City will incorporate our recommendations into the forthcoming revisions of each MTRP management documents. Should you have additional questions regarding this letter, please contact Paul Schlitt of the Department at 858-637-5510 or paul.schlitt@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager

cc: David Zoutandyk, USFWS

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



April 15, 2014

Ms. Myra Herrmann, Senior Environmental Planner

City of San Diego**Development Services Department**

1222 First Avenue, MS 501
San Diego, CA 92101

Sent by U.S. Mail

No. of Pages: 5

RE: SCH#2014041011 CEQA Notice of Preparation (NOP)n; draft
Environmental Impact Report (DEIR) for the **"Mission Trails Regional
Park (MTRP) Master Plan Update (MPU) and Natural Resources
Management Plan (NRMP)"** located in the City of San Diego; San Diego
County, California

Dear Ms. Herrmann

The Native American Heritage Commission (NAHC) has reviewed the
above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project
which includes archeological resources, is a significant effect requiring the
preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with
this provision and mitigate project-related impacts on archaeological resources,
the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the
identification and evaluation of accidentally discovered archeological resources,
pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas
of identified archaeological sensitivity, a certified archaeologist and a culturally
affiliated Native American, with knowledge in cultural resources, should monitor
all ground-disturbing activities. Also, California Public Resources Code Section
21083.2 require documentation and analysis of archaeological items that meet
the standard in Section 15064.5 (a)(b)(f).

If there is federal jurisdiction of this project due to funding or regulatory
provisions; then the following may apply: the National Environmental Policy Act (NEPA
42 U.S.C 4321-43351) and Section 106 of the National Historic Preservation Act (16
U.S.C 470 *et seq.*) and 36 CFR Part 800.14(b) require consultation with culturally

affiliated Native American tribes to determine if the proposed project may have an adverse impact on cultural resources

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
San Diego County California
April 15, 2014**

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014041011; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP); located in the City of San Diego; San Diego County, California.

**Native American Contacts
San Diego County California
April 15, 2014**

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612
Jamul , CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Diegueno/Kumeyaay

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road
Lakeside , CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Diegueno/Kumeyaay

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Diegueno

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, cultural Resources
P.O. Box 908
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Diegueno/Kumeyaay

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775
Pine Valley , CA 91962
(619) 709-4207

Diegueno -

San Pasqual Band of Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 365
Valley Center, CA 92082
(760) 749-3200
council@sanpasqualtribe.org
(760) 749-3876 Fax

Diegueno

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd.
Escondido , CA 92025
(760) 737-7628
(760) 747-8568 Fax

Diegueno

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Diegueno/Kumeyaay

This list is current only as of the date of this document.

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This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014041011; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP); located in the City of San Diego; San Diego County, California.

**Native American Contacts
San Diego County California
April 15, 2014**

Iipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694
cjlinton73@aol.com

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon, CA 91919
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine, CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. 937 Diegueno/Kumeyaay
Boulevard, CA 91905
bernicepaipa@gmail.com
(KCRC is a Coalituton of 12
Kumeyaay Governments)

This list is current only as of the date of this document.

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TO: Myra Herrmann, City of San Diego

Phone: 619 446 5372
Fax:
email: MHerrmann@sandiego.gov

FROM: Department of Toxic Substances Control



Primary Contact: Alice Gimeno-OBrien
Phone: (714) 484-5429
email: agimeno@dtsc.ca.gov
Alert ID: 2692856

RE: Your Ticket Number or ID: 679810

Event Type: CEQA
Work Address: ,
Near Intersection:

Work Date: 04/07/2014
Work Done For: San Diego, City of
SCH Number: 2014041011; Document: 679810; street
City Council Approval (Process 5) of the Mission Trails Regional Park (MTRP) Master Plan Update (Master Plan), Natural Resource Management Plan (NRMP) and associated community plan technical amendments. In 2010, the City of San Diego initiated a project to update the 1985 MTRP Master Plan, develop a NRMP, and process a Programmatic EIR to cover the activities identified in both.

Location Details:

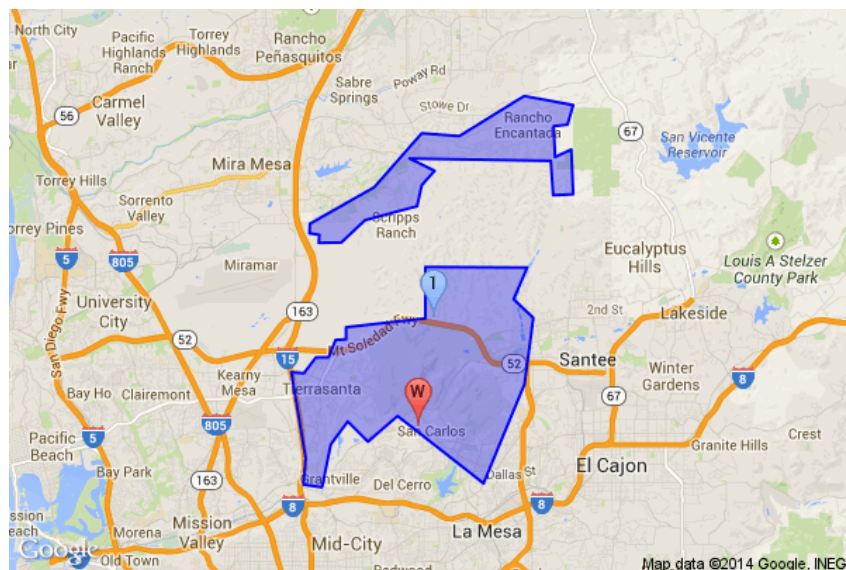
Work Description: CEQA Event: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments Document Type: NOP - Notice Of Preparation

Dig Clean Safety and Land Use Advisory

The Department of Toxic Substances Control (DTSC) understands you intend to conduct excavation work at the subject location. DTSC has determined the proposed excavation work is located within or in close proximity to the CAMP ELLIOT (J09CA0067 / CA99799F527500) Formerly Used Defense Site (FUDS) based, in part, on the United States Department of Defense ordnance maps located at <http://www.terradox.com/UserPages/PDF/CA99799F527500.pdf> An approximate general location map is included with this document.

This FUDS site may contain abandoned munitions and explosives (collectively, ordnance) or other hazardous substances, which are considered hazardous materials as defined in section 25260 of the California Health and Safety Code. Significant impacts to human health and the environment may occur should workers encounter ordnance or other hazardous substances.

In order to protect human health and the environment, DTSC recommends measures be implemented to ensure hazardous materials are not encountered. If ordnance is discovered, DTSC recommends the following: 1) retreat from the area; 2) call 911 or local law enforcement; and 3) contact DTSC. If other hazardous materials are encountered, please contact your local environmental agency and DTSC.

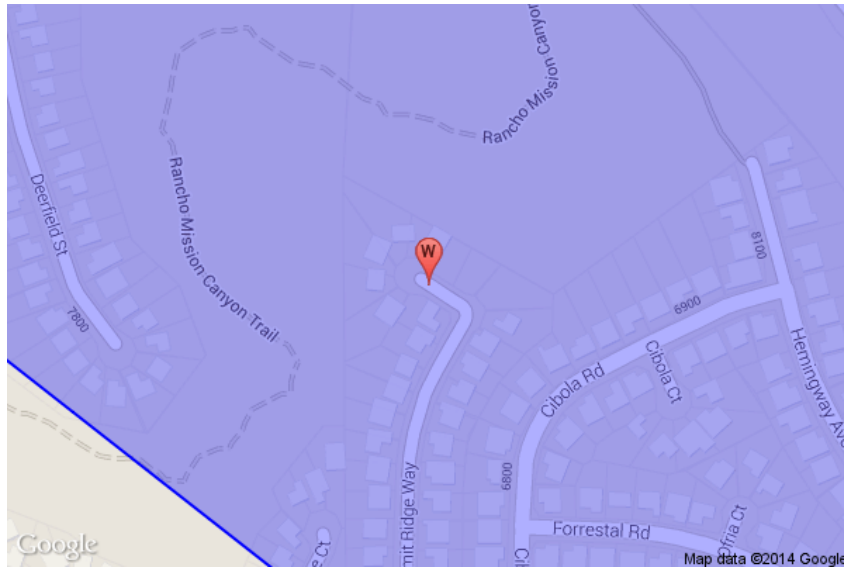


W area indicates your work area as known to us.

Shaded polygons (blue) are the area(s) of concern.

Note, on occasion all of the map area is shown in blue and therefore of concern.

Zoom To Work Area:



SITES WITH ENVIRONMENTAL RESTRICTIONS SHOWN ON MAP:

Site 1: CAMP ELLIOT (J09CA0067 / CA99799F527500)
(37970025)

SAN DIEGO

Site
URL: [Go To DTSC Site Web Page](#)

ALTERNATIVES TO VIEW THIS INFORMATION:

View on the Web:

<http://www.digclean.com>, enter 20410685

Call to forward this information as fax:

650-209-4229, when prompted enter 20410685

Send Text Message to receive text message with link to information:

Message: 20410685 To: 650-209-4229

Sent By Terradex, Inc. on behalf of Department of Toxic Substances Control

Terradex at:operations@terradex.com Phone 650-227-3250, Fax 3255 Advisory Reference Number: 20410685
LW SiteID 3543, pg_siteid 11875, pg_eventid 163930 1: 11875 0m 0.0086418area 750 length1413, pdf_filename:
2014-4-22_163930_ResponseTo_CEQA_679810_3543_37970025_20410685
Date: 2014-4-22



County of San Diego

MARK WARDLAW
DIRECTOR
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(858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
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DARREN GRETHER
ASSISTANT DIRECTOR
(858) 694-2962
(858) 694-2555

May 2, 2014

Myra Herrmann, Senior Environmental Planner
City of San Diego
Development Services Dept.
1222 First Avenue, Mail Stop 501
San Diego, CA 92101

Sent via email: DSDEAS@sandiego.gov

COMMENTS ON NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE AND NATURAL RESOURCES MANAGEMENT PLAN, WBS NO.: S-01014.02.06

Dear Ms. Herrmann,

The County of San Diego has received and reviewed the Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for Mission Trails Regional Park (MTRP) Master Plan Update and Natural Resources Management Plan (NRMP) dated April 2, 2014. We appreciate this opportunity to comment. County Department of Parks and Recreation (DPR) and Department of Public Works (DPW) staff have completed their review and have the following comments regarding the content of the NOP.

The County of San Diego appreciates and supports the recommendations to include the additional proposed multi-use trails in the West Sycamore area of the park. The addition of these trails will provide loops and connectivity to the County's Goodan Ranch Sycamore Canyon Preserve, as well as providing east-west connectivity for the County's Trans-County Trail.

The County of San Diego encourages the consideration of multi-use trails wherever possible within MTRP to align the trail use with the County's Trail Plan which promotes non-motorized multi-use trails (equestrian, pedestrian and bicycles) when considering trail improvements, reroutes or new construction.

The County of San Diego appreciates the opportunity to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any

questions regarding these comments, please contact Sheri McPherson at (858) 694-3064 or email at sheri.mcpherson@sdcountv.ca.gov.

Sincerely,



TODD SNYDER, Chief
Advance Planning Division

e-mail cc:

Sachiko Kohatsu, Policy Advisor, Board of Supervisors, District 3

Adam Wilson, Policy Advisor, Board of Supervisors, District 2

Megan Jones, Group Program Manager, LUEG

Megan Hamilton, Group Program Manager, Department of Parks and Recreation

Cailin Hunsaker, District Park Manager, Department of Parks and Recreation

Julia Quinn, Environmental Planning Manager, Department of Public Works



San Diego County Archaeological Society, Inc.

Environmental Review Committee

14 April 2014

To: Ms. Myra Herrmann
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
Mission Trails Regional Park Master Plan Update and Natural Resources
Management Plan


Dear Ms. Herrmann:

Thank you for the Notice of Preparation for the subject project, received by this Society earlier this month.

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

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

Sincerely,


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

cc: SDCAS President
File

RINCON BAND OF LUISEÑO INDIANS

Culture Committee

1 W. Tribal Road · Valley Center, California 92082
(760) 297-2621 or (760) 297-2622 & Fax: (760) 749-8901



April 9, 2014

Myra Herrmann
The City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Mission Trails Regional Park Master Plan Update and Natural Resources Management Plan

Dear Myra Herrmann:

Thank you for inviting us to submit comments on the Mission Trails Regional Park Master Plan Update and the Natural Resources Management Plan. This letter is written on behalf of the Rincon Band of Luiseño Indians. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for impacts to historic and cultural resources and finding of items of significant cultural value that could be disturbed or destroy and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is within the Aboriginal Territory of the Luiseño people, but is not within Rincon's Historic boundaries.

Please contact the Native American Heritage Commission and they will assist with a referral to other tribes in the project area.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Rose Duro
Rincon Culture Committee Chairman

Att'n: Ms Myra Herrmann

Senior Environmental Planner, City of San Diego

1222 First Ave, MS 501,

San Diego, CA 92101

Dear Ms Herrmann,

As a Part owner of a land parcel in East Elliot Property, I am writing my comments, regarding the Subject City project, to you as you requested.

Reading your Notice for the meeting regarding the subject project, I realize that you had it published in San Diego Daily Transcript and on the city of San Diego Web-site. Unfortunately, I and many other people do NOT read newspapers nor do I browse websites. Publishing your meetings in the news paper is certainly a nice service to the general public of the city of San Diego, however, it does not serve the property owners who are directly affected by your decisions and who pay the property taxes on the land you are considering for the Mission Trail Regional Park (MTRP). The Property owners deserve a notice from you to be sent by US mail to their addresses of records so they can participate in the decision making process that shapes the destiny of their property and their lives.

A) Now, with regard to the "Purpose for the Master Plan Update" (item # 2 of your notice for the meeting) : Incorporate within the MTRP boundaries and provide Planning for the management of resources and development of recreational opportunities within Land acquired for the preservation in East Elliott Community plan area, while continuing to provide for potential private development per community plan and the MSCP guidelines.

It is nice of you and the City Planners to continue to provide for POTENTIAL private development. Unfortunately the facts on the ground indicate that all the City Planning for the East Elliot property and the owners of had gone from bad to

worse to the land and to their owners in the last three to four decades. I witnessed all the events become reality:-

- 1) In the mid eighties I and majority of East Elliot property owners signed a contract to sell my land and theirs to a private land developer at \$50,000 per acre. The developer spent money and time negotiating with the City Planners for about a year or two only to turn down the Residential Development project in favor of the Multiple Species (Birds) Conservation Program (MSCP).
- 2) The City, however, approved a project to take part of the East Elliott properties for Garbage Dump Expansion and another part for Mission Trail Regional Park (MTRP). By the way, I believe that the hiking trail of the MTRP runs through my lot. **Therefore, I herewith hold the MTRP planning and the City of San Diego Planners and Administration responsible for any claimant who might get hurt by tripping on my lot or get hurt for trespassing.**
- 3) I understand that the City had DENIED an East Elliott Property owner to exercise his right to develop his Parcel of land according to the current Zoning code-RS1-8 or subdivide his Parcel to one acre lots and build on it one residential dwelling on each acre lot (according to the current zoning code). But the City placed **restriction** to accommodate the "OPEN SPACE" –an expression I never heard of before!! And in order to comply with the "Open Space" Restrictions, the City is allowing the owners to develop a "POTENTIAL" SMALL portion of their land- **One Dwelling per Parcel !!!!** In my case, having 10 acres parcel, I can only build ONE dwelling on it and the remaining 9 acres shall be left to the OPEN SPACE!!! In other words, I can only develop 1/10th of my land surface and leave the rest for the OPEN SPACE – for trespassers.

So, where IS THE CITY PROVISIONS FOR POTENTIAL PRIVATE DEVELOPMENT you claim to promise to the land owners!!!!???. What a Potential you are offering!!!

- B) Regarding Item# 4 of the " Purpose For The Master Plan Update":-Updating the Planning recommendations in the 1985 Mater Plan for MTRP **based on the public's recreational desires,....and regulations.**

- 1) I appreciate your considerations and response to the Public's recreational desires.But, how about some consideration for the Property owner's

desires!!!! Don't we count in your agenda? Or do we count only when you collect the property TAX??

In summary, It appears to me that the City Planners and Administrators are embarked on executing a plan to swindle the property owners out of their properties by plying the game of Catch 22 with the East Elliott Property owners.

The Plans, the Regulations ,and Restriction of the City of San Diego Planners and Administrators have resulted in decrease instead of an increase in the value of the land in the last four decades. And the same plans, regulations, and Restrictions have deprived the East Elliott property owners of their legitimate right to develop their land according to the current City Zoning code RS1-8 . I have no problem with the City of San Diego and the Planners if they decided to takemy land and assign it to the public, or to the birds species, or to the OPEN SPACE, or Closed Space as long as I get a fair compensation for my land. Is this asking too much? And Please do not tell me that the City does not have money. I would be gland to donate my land to the City and the Public had I been Rich. My land was purchased by my brother in law as a financial security for him and his family during his retirement. Unfortunately, he did not live to harvest the fruit of his investment.

This particular situation with the East Elliott Property and the City of San Diego planners and administration can only happen in a totalitarian country in the nineteenth and twentieth century NOT in AMERICA IN THE 21 century for God's sake!!!

I am appalled to say the least. And I would like to take my case to the public; they may sympathize with the Property owners for the pain The City had caused to them. A copy of this, my comments, will be sent as a letter to the editor of San Diego Daily Transcript.

Thank you

Mitri Barghout

msbarghout@att.net

Dave Dilday
840 Cofair Ct.
Solana Beach, CA 92075

April 18, 2014

Myra Herrmann
Senior Environmental Planner
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Notice of Preparation Mission Trails Park Master Plan Update WBS No:S-01014.02.06

I am writing on behalf of myself, and my partners with regard to the update of the MTMP. We own a 16 and a 13 acre parcel in the northeast portion of East Elliott adjacent to the recently approved Castlerock project. Our APN's are 366-050-25-01 and 02 and 366-050-23.

After attending the scoping meeting held last night, on April 17, we have some serious concerns with regard to this update and how it may affect private property owner's rights in this area. As part of the update, it appears that many unauthorized trails are to be closed. These closures are fine in concept, however, it will be nearly impossible to police these closures. This appears to be an exercise in futility.

Our main concern is that as part of this update the City clearly shows a multi-use trail traversing our private property. Your NOP document figure 7 shows R24, R26 and R27 traversing our property. We strongly object to the City planning trails on our private property without our permission. In fact, one could surmise that by publicly showing this trail on your Mission Trails Master Plan Update, you are, in fact, advocating public use of private property.

In the past, we have not fought the public encroachment on our property, however, due to the change in dynamics in the area, we are formally withholding any rights for the public to trespass on our property, unless we can have assurances from the City and City Attorney that we will be fully indemnified against any action taken against us for unauthorized trespass on our lands.

We would like to work with the City to insure that the public can use our lands, however, we need to be fully protected against lawsuits. California Premises Liability Law maintains that it is the duty of the landowner to use reasonable care to maintain his or her property in safe condition or, alternatively, adequately warn of the danger. Unfortunately, we live in a very litigious society and whether people have just cause or not, they will sue.

We are currently in the process of submitting a plan to develop our property under the MSCP guidelines which allow us to develop the least sensitive 25% of our property. It appears that the multi-purpose trail shown on our property traverses the upper portion of our lot, which will most likely be the portion that will be deeded to the City as permanent open space if our development plan is approved. In this case, our concerns would be mute.

The MSCP was set up to provide a balance between private property owner's rights and the protection of sensitive lands. The economic value of our lands are based on these rights and the current zoning of RS-1-8 allows for one dwelling unit per 40,000 sq. ft. We are hopeful the intent of the MSCP and will work with our plan to develop the property.

We are also aware that area in question is "designated open space". This designation is at odds with the current residential zoning and therein lies the main problem. Many of us have owned property in this area for a very long time and we feel that we have been wronged by the City with regards to the land use in this area.

It seems unfair to many that whenever the City had funds for the purchase of open space property, those funds are always allocated to the west side near Spring Canyon, while those owning land on the west side near the Castlerock project are told by Planning that they can only develop one lot per parcel, which essentially takes away any economic value of the property.

In short, the land planning and decision making at the City level for East Elliott has been highly suspect and inconsistent at best. We would suggest that before the City undertake the expensive task of updating this plan, they consult with the City Attorney to insure that marking trails on public lands does not open up the City to unwanted liability.

In short, we are willing to work with the City so that the public can continue to enjoy recreational use of these private lands, however, we need proof in writing that the City will indemnify us against any actions against the private landowner's.

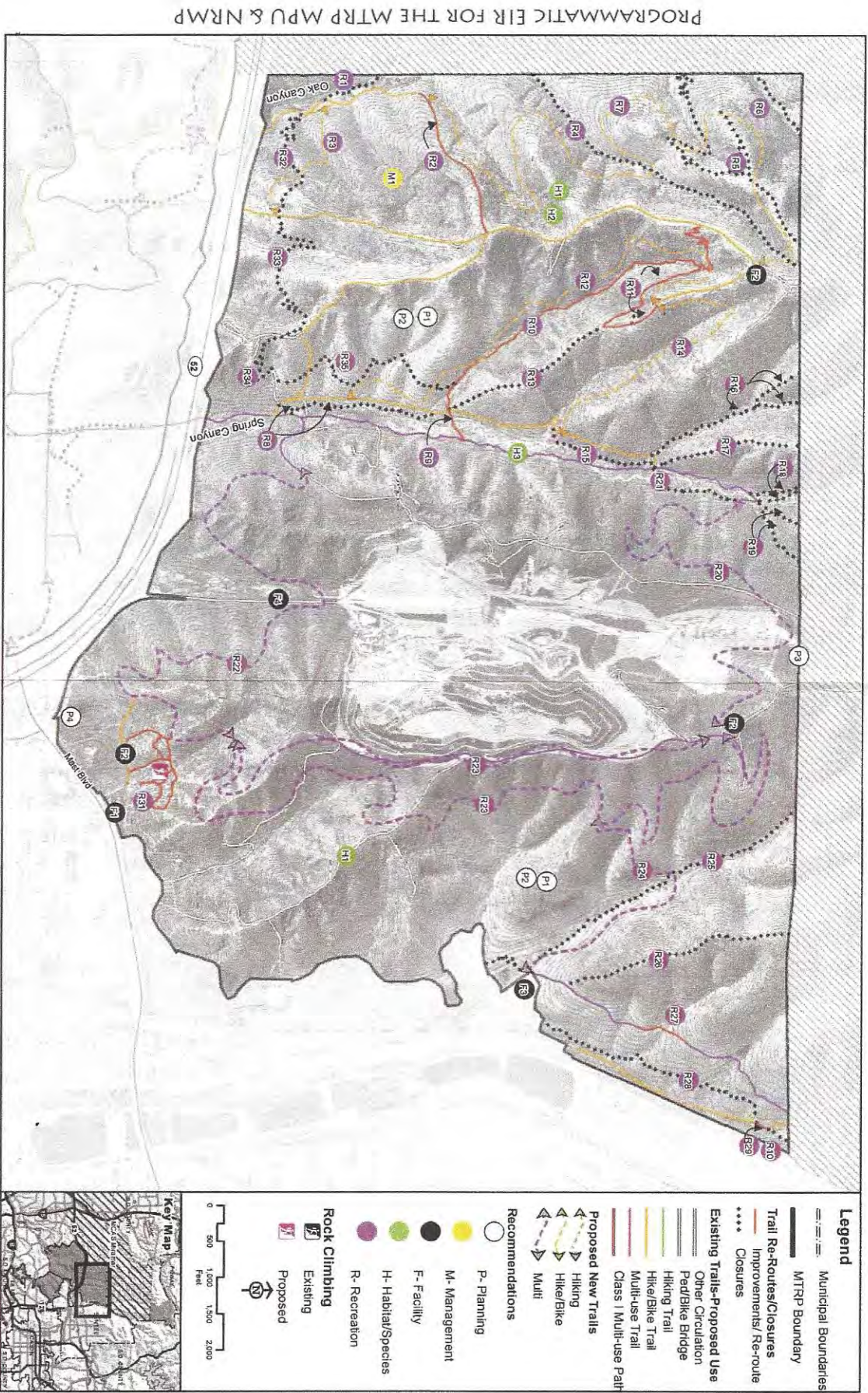
Until we have proof from the City that we are fully indemnified against any actions resulting from injury on our property, we formally withdraw our consent for the public to use our lands. Furthermore, in the event that we don't have written assurance from the City within 30 days of this writing, we will assume the City has agreed to take on all liabilities resulting from injury or trespass on our property.

Regards,



Dave Dilday
619.200.9787

FIGURE 6



CALIFORNIA PREMISES LIABILITY LAW

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Duty to: (1) Keep Safe; or (2) Warn of the Danger:

A possessor of land has a duty to use reasonable care to maintain his or her property in safe condition or, alternatively, adequately warn of the danger.

"Premises" means land, the building on the land, or other structures on land.

"Possessor" means the person who owned, possessed [leased, occupied] or controlled the Premises. *Isaacs v. Huntington Memorial Hospital* (1985) 38 Cal.3d 112, 134; *Alcaraz v. Vece* (1997) 14 Cal.4th 1149, 1162

Liability for harm to Persons and/or Property

A Possessor is liable by negligently using and/or maintaining the premises which causes harm to a person or property (See CACI 1000).

Negligence

Negligent means that the Possessor did not exercise "ordinary care or skill *in the management of his or her property* or person...[CA Civil Code § 1714(a)] thereby exposing persons to an unreasonable risk of harm. (*Brooks v. Eugene Burger Management Corp.* (1989) 215 Cal.App.3d 1611, 1619; *Alcaraz v. Vece* (1997) 14 Cal.4th 1149, 1156.

Stated another way, the Possessor must use reasonable care to keep the Premises in reasonably safe condition or adequately warn of the danger. *Ann M. v. Pacific Plaza Shopping Center* (1993) 6 Cal.4th 666, 674. Thus, a Possessor has a duty to use reasonable care to discover any unsafe conditions and to repair, replace, or give adequate warn of the unsafe condition.

Duty to Inspect for Concealed Dangers

" [A] landowner's lack of knowledge of the dangerous condition is not a defense. He has an affirmative duty to exercise ordinary care to keep the premises in a reasonably safe condition, and therefore must inspect them or take other proper means to ascertain their condition. And if, by the exercise of reasonable care, he would have discovered the dangerous condition, he is liable." (*Swanberg v. O'Mectin* (1984) 157 Cal.App.3d 325, 330.

A property owner generally has a duty to keep its premises in a reasonably safe condition and to warn those coming onto the property of latent or concealed perils. (*Lucas v. George T.R. Murai Farms, Inc.* (1993) 15 Cal.App.4th 1578, 1590.

Open and Obvious Conditions and Comparative Negligence

Where, a "danger is so **obvious** that a person could reasonably be expected to see it, the condition itself serves as a warning" and the property owner has no duty to warn of the condition (*Krongos v. Pacific Gas & Electric Co.* (1992) 7 Cal.App.4th 387, 393). However, he or she may still have a duty to remedy the dangerous condition, with the obviousness of the danger relevant to the issue of the injured person's comparative negligence. *Donohue v. San Francisco Housing Authority* (1993) 16 Cal.App.4th 658, 665; *Osborn v. Mission Ready Mix* (1990) 224 Cal.App.3d 104, 114-122.

Constructive Notice of Store Owner Regarding Dangerous Conditions

A plaintiff may prove a dangerous condition existed for an unreasonable time with... 'evidence that...the dangerous condition was present for a sufficient period of time to charge the [store] owner with constructive knowledge of its existence." *Ortega v. Kmart* (2001) 26 Cal.4th 1200, 1205, 1206, 1210.

Preventing Criminal Acts

Further, defendant property owner is negligent if he/she/it allows a dangerous condition on its property or failed to take reasonable steps to secure its property against criminal acts by third parties." (*Delgado v. American Multi-Cinema, Inc.* (1999) 72 Cal.App.4th 1403, 1406, fn. 1.

"[O]nly when 'heightened' foreseeability of third party criminal activity on the premises exists-shown by prior similar incidents or other indications of a reasonably foreseeable risk of violent criminal assaults in that location does the scope of a business proprietor's special-relationship-based duty include an obligation to provide guards to protect the safety of patrons." (*Delgado v. Trax Bar & Grill* (2005) 36 Cal.4th 224, 240.

"Even when proprietors ... have no duty ... to provide a security guard or undertake other similarly burdensome preventative measures, ...there are circumstances (apart from the failure to provide a security guard or undertake other similarly burdensome preventative measures) that may give rise to liability based upon the proprietor's special relationship." (*Delgado, supra*, 36 Cal.4th at pp. 240-241.)

"Once a court finds that the defendant was under a duty to protect the plaintiff, it is for the factfinder to decide whether the security measures were reasonable [and 'adequate'] under the circumstances. (*Isaacs v. Huntington Memorial Hospital* (1985) 38 Cal.3d 112, 131 [211 Cal.Rptr. 356, 695 P.2d 653], internal citation omitted.)

Reasonable Person Test

"The proper test to be applied to the liability of the possessor of land ... is whether in the management of his property he has acted as a reasonable man in view of the probability of injury to others" (*Rowland v. Christian* (1968) 69 Cal.2d 108, 119.

Status of Visitor

Under the common law, a visitor's status on the property-as a trespasser, a licensee, or an invitee determined the extent of the owner's duties to the visitor. Under current law, status may be relevant to the specific nature or scope of those duties or to the foreseeability that the visitor might be harmed. (*Ann M., supra*, 6 Cal.4th at pp. 674-675.) See also *Beauchamp v. Los Gatos Golf Course* (1969) 273 Cal.App.2d 20, 25.

See also [Invited Areas of Premises](#).

Natural versus Artificial Conditions

The law rejects the distinction between artificial and natural conditions (*Sprecher v. Adamson* (1981) 30 Cal.3d 358, 371.

See also [Trivial Defect Law](#)

Further, see [Inadequate Lighting of Premises](#)

Also, see [Premises Liability at Medical Facilities](#)

Moreover, see [No Prior Similar Accidents](#)

If you've been the victim of a premises liability incident, [contact Christian lawyer, Matthew B. Tozer](#) for a free consultation.

Disclaimer: The information provided in this article is informational, only. The subject matter and applicable law is evolving and/or constant state of change. This advice is based on California law. No legal advice is given and no attorney/client or other relationship is established or intended. The information provided is from general sources, and I cannot represent, guarantee or warrant that the information contained in this website is accurate, current, or is appropriate for the usage of any reader. It is recommended that readers of this information consult with their own counsel prior to relying on any information on this website.

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April 14, 2014

Ladies and Gentlemen:

Introduction

This is written in response to the request for comment in the Notice of Preparation (NOP) of the Draft Environmental Impact Report and Scoping Meeting Notice WBS No.: S-01014.02.06. The subject is the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP). Project # 349988

These comments pertain in particular to the plan to incorporate the East Elliott Planning Area, about 2500 acres, into MTRP. The comments may apply to other areas.

We oppose incorporation of the East Elliott Planning Area into Mission Trails Regional Park for the reasons discussed below. We recommend the "No project alternative" as it applies to East Elliott.

It is our belief that the City acquired East Elliott property from private owners using policies and practices that are contrary to the Multiple Species Conservation Program (MSCP), and the Habitat Conservation Plan (HCP) legislation incorporated into the Endangered Species Act by the United States Congress.

Background

East Elliott was sold by the Federal Government to private citizens in the 1960s and 1970s as property ready for residential development. The land was formerly part of Camp Elliott, a military training base. After the sale, the City did not allow the land to be developed. The City implemented a 1971 plan update presumably to facilitate development, but subsequently declared the 1971 update unworkable. In 1981 the City wrote to the private owners inviting the owners to organize and do the planning for East Elliott. The City claimed not to have sufficient funds to plan the area, but promised cooperation with the private owners if the owners undertook the planning.

The East Elliott Property Owners Association (EEPOA) was formed in 1986. Funds were deposited with the City, and the City designated EEPOA as the official planners for East Elliott. Working with a cooperative developer, EEPOA proceeded with the development process, meeting regularly with City planners. The promised City cooperation did not occur.

In 1993 the City Council declared a moratorium on planning for East Elliott in order to study the area for another landfill. The City subsequently determined not to proceed with landfill plans at that time.

The City was then creating the Multiple Species Conservation Program (MSCP). The MSCP covered the East Elliott Planning Area. The MSCP was subsequently adopted in 1997.

The MSCP is a Habitat Conservation Plan (HCP). The explicit purpose of an HCP is to provide private owners the right to economically develop their property. The private owner as a condition of development establishes a plan to protect endangered species, namely the HCP. This involves setting aside a portion of the owners' land for conservation purposes.

The MSCP version of an HCP determines that an owner may develop 25% of his or her land. The owner is required to deed to the City 75% of their land for conservation. It is notable that the MSCP is a marked departure from U.S. Congressional intent to provide for economic development. The MSCP restricts the amount of private land the owners may develop, consigns the overwhelming majority of the land for conservation, and limits what the owner is allowed to do with the land.

Even with these restrictions, the MSCP provides the means for the owners to economically develop their property.

Mayor Susan Golding's introductory letter to the MSCP sets the framework. Mayor Golding says in principle part:

"The MSCP is an historic accord established to strike a critical balance between development and the protection of valuable habitat. Together, the City of San Diego, the U.S. Department of the Interior, the California Resources Agency, and members of the environmental and building and development communities have worked to develop a sound plan to put aside habitat of endangered species while making it easier and less expensive for most property owners to develop their land.

Secretary of the Interior Bruce Babbitt has called this plan a "model for the country...that truly demonstrates that the preservation of ecosystems and the unique plants and wildlife they support is compatible with growth and development." (Underline added)

The plan calls for land to be set aside in a major biological preserve. Once this preserve is dedicated, property owners can develop their land without having to undergo a lengthy, costly state and federal environmental permit process. It is estimated that the plan will cut one to seven years off this process."

These lofty principles were not applied in East Elliott. Special interest park expansionists influenced City leaders to use East Elliott to expand Mission Trails Regional Park. To accomplish this goal, the City, contrary to the intent and purpose of the MSCP and HCPs in general, put barriers in the path of owner development. This is so the City could purchase all the land to add to Mission Trails Regional Park. The City also provided for installing a second landfill in East Elliott.

How the City orchestrated regulations to obtain private property for Mission Trails Regional Park.

The City revised the East Elliott Community Plan in 1997 to *remove* property from development. The City determined that 2,259 acres previously allowable for development would now be open space.

If the City followed the MSCP, the City would have been deeded 75% of the owners' property at no cost. Using 2259 acres as the basis, the City would have obtained 1694.25 acres for open space free of cost. By restricting development so the City could purchase the land means that the City has spent millions of dollars of taxpayer funds. 1694.25 acres freely obtained would have made an ample addition to the 5800 acre park.

The City also adopted a policy restricting private development to 1 dwelling unit per ownership parcel. The actual East Elliott zoning is 1 dwelling unit per 40,000 square feet (approximately one acre), or RS1-8. The City considers RS1-8 zoning to be very low density. It is a zoning density that falls within MSCP development guidelines. Under the City's revised 1 dwelling unit per parcel policy, if an owner wishes to develop their 25-acre parcel, the City would only allow 1 dwelling unit.

Examples of City prohibition of private owner development

An owner submitted a plan to the City for review. The owner held two parcels totaling 17.86 acres. The owner proposed 19 single-family lots based on the actual RS1-8 zoning. The City responded that due to the open space designation, further subdivision of the property would not be consistent with the community plan designation. The City said that what could be found consistent with the community plan Open Space designation is the development of the site with 1 dwelling unit per existing lot. In other words, the City would consider two (2) dwelling units.

The owner submitted a subsequent plan to the City for review. It consisted of 4 parcels. The owner sought a 30-lot subdivision based on the existing RS1-8 zoning. The City responded that the parcels in question are designated Open Space by the East Elliott Community Plan. The Open Space designation is intended to preserve habitat for a number of endangered or threatened wildlife species. No development allowance was provided.

The City planner suggested a "density transfer". Long Range Planning has accepted density transfers between parcels on various occasions. That means an owner must acquire *other* property for which greater density of development is allowed. The owner must then seek to transfer that density into East Elliott. The planner indicates that there is no assurance that the City would accept such a proposal.

It is worthy of note that the 1 dwelling unit per ownership parcel policy is, if it were ever even feasible to develop at this density, is effectively a way to create more open space than the 75% that is legally allowable if the City permitted development.

In these ways, the City has imposed restrictions on East Elliott development to prevent the owners' from economic use of their property. The City then comes along with purchase offers on selected property at low valuations.

The current plan is to annex East Elliott into the park using the City's ill-begotten East Elliott properties.

The City ignores owner protections

There are provisions in the MSCP intended to protect private owners from overzealous attempts to obtain more land for conservation. They include:

No Surprises Policy. This is a measure issued by the Secretary of the Interior not to require an HCP permit holder to commit any additional land or funds if it is determined that more land for conservation is needed.

Land purchase only from "willing sellers". The City may only buy land from "willing sellers". The City claims it is doing this. By the City restricting development, owners, out of despair of ever being allowed to economically develop their property, become "willing sellers". Due to the restrictions, owners and their successors are left holding land they are unable to use. They pay taxes on the land. Therefore, they become "willing" to sell their property to the City in an exploitive process the City controls.

Respect for private property rights. The principle tenet of the MSCP is respect for private property rights. This is clearly not occurring.

The City claims that even with incorporation of East Elliott into Mission Trails Regional Park, the private owners retain development rights. This is a legalistic fig leaf that masks the City's regulating the property into disuse. The City does not disclose the restrictions on development it has placed on private property development. The City also does not indicate what additional difficulties or restraints it places on private owners by their parcels being situated in the middle of a park.

Conflict with fundamental City priorities

In 2002, the City declared a housing emergency. In 2006 only 4% of city land was determined to be suitable for housing use. The City was running out of land for residences. Due to these circumstances, the City re-wrote the General Plan. The new General Plan emphasizes smart growth, vertical development, on in-fill space. In the present instance, the City actively *removes* land from residential development. In the case of East Elliott, the City has removed 2259 dwelling units that would be available at the very low density of 1 dwelling unit per 40,000 square feet. This deviation from fundamental values is to meet special interest wishes to expand Mission Trails Regional park. The park, at 5800 acres, is the largest such park in California. It is among the largest in the nation. The City has recently added another 1300 acres of land to the park in an area geographically separate from the park by 10 miles in the Rancho Encantada

area, now called Stonebridge Estates. Park advocates call this addition "Mission Trails Regional Park-North".

It is worthy of note that there is more land in San Diego devoted to open space than any other use including residential land (28% for open space compared to 24% for residential). The effort to add more land to Mission Trails Regional Park is misguided and contradicts fundamental City priorities.

San Diego Canyon Lands Measure to dedicate MSCP land.

In 2012 the City Council voted to approve *dedication* of certain MSCP City-owned land. The concept of dedication is derived from the City Charter. It means that the City Council and future City Councils have no authority to determine how dedicated land is used without a 2/3 vote of the electorate. The dedication measure applies to city-owned land in East Elliott (and perhaps on other land that is planned for incorporation into Mission Trails Regional Park). It remains unexplained how the current action to incorporate East Elliott land into the park is being justified on dedicated land.

Conclusion

The City has intentionally abrogated the terms and purpose of the Multiple Species Conservation Program to facilitate private economic development. By preventing development, the City intends to induce the private owners to sell their land to the City (at low prices) so the City can incorporate the privately held land into Mission Trails Regional Park. This is an improper use of the City's regulatory authority. The City disrespects private property rights. The City is also acting contrary to fundamental City priorities by removing land that is available for residential development. The City needlessly spends millions of dollars of taxpayer dollars for this purpose. The City's conduct is the cause of great harm to the private owners. It is one thing to value adding to a park, and another to do so by egregious mistreatment of private property owners. For these reasons, the action to incorporate East Elliott land into Mission Trails Regional Park should be disallowed.

A handwritten signature in black ink, reading "Stephen Goldfarb". The signature is written in a cursive, flowing style with a large, stylized 'S' and 'G'.

Stephen Goldfarb

Ms Myra Herrmann
Senior Environmental Planner, City of San Diego
1222 First Ave, MS 501,
San Diego, CA 92101

Dear Ms Herrmann,

As a Part owner of a land parcel in East Elliot Property, I am writing my comments, regarding the Subject City project, to you as you requested.

In the Early 60's my dad purchased 9.05 acres of the East Elliott property after reviewing a beautiful housing development that was to be produced in this area. His plan was to buy this for when he retired . He never lived to see his dream come true. In the early 90's he found out that he would never be allowed to build on his property. He died in 1997 leaving this property to his children. I am the executor of that estate and I am appalled at the way the City has ignored us landowners.

I have written several letters to the City, Land fill, and Mission Park with not one of them being answered. The only time I hear from anyone concerning this property is when they send me reminders to pay my taxes, which has been done since the 60's or to tell me that you are considering just taking the property from me. This is a real insult to me and my family after we have faithfully paid out taxes for all this time.

As I stand on the overpass and look into the valley and the bike trail from Mission Park I see it going right past or probably through our property. We never were informed that this trail was even going to be made.

We do not live in California and have to make a special trip out there to see for ourselves what is being done in and around our property. The new plan you are discussing should allow all of the landowners to receive fair market value for the property we have been investing in over the last 40-50 years. Anything less is unacceptable to me and my family.

Sincerely,

Diana L. (MADAY) Johnson
Executor of Lawrence J Maday Estate

From: Andy Kean [<mailto:loveoaks@gmail.com>]
Sent: Thursday, April 10, 2014 4:45 PM
To: DSD EAS
Cc: keano@att.net
Subject: NOP Comments for Mission Trails - MTRP MPU and NRMP, WBS# S-01014.02.06

Dear Myra Herrmann, Senior Environmental Planner;

Thank you for the attached NOP related to the Mission Trails - MTRP MPU and NRMP and for the opportunity to comment on the scoping of the EIR.

Our home at 14710 Beeler Canyon, Poway, adjoins the West Sycamore Park at the intersection of Beeler Creek and the Beeler Canyon Trail.

Our Beeler Creek Conservancy is actively working to establish oak grove habitat in Beeler Canyon adjoining the oak grove habitat enhancement in West Sycamore Park along Beeler Creek performed by the developers of Stonebridge Estates.

Regarding 5.7.5. WS-R2 - new trail recommended along northern facing slope from staging area down to Beeler Canyon:

Considering that “Public access and recreational use must be viewed as secondary uses” and “Recreational trails are identified

as compatible uses within the MSCP, as long as they do not compromise the long-term ecological values of the area”:

The EIR should consider the effect of a such a trail on the northern facing slope to:

- 1. Disturbance of wildlife in the valley of the Beeler Creek headwaters;**
- 2. Disturbance of wildlife in the gullies draining into that valley;**
- 3. Disturbance to water drainage in the gullies draining into that valley;**
- 4. Disturbance of existing heavy vegetation on the north slope;**
- 5. Soil erosion caused by a trail on the north slope.**

As an alternative, consider using the unofficial trail that has developed on the ridge of the south facing slope and whether proper development of that trail could solve the trail circulation objectives, allowing the of the valley of the Beeler Creek headwaters and the north slope remain undisturbed.

As another alternative, consider whether the trail on the north slope could be on the ridge of the north slope rather than the face of the slope.

Regarding 5.7.2 – Management:

Since the opening of the Beeler Canyon Trail horses have been using the unofficial trail that has developed on the ridge of the south facing slope and they have been going up Beeler Creek, east of the Beeler Canyon Trail. Both of these areas are suffering damage as a result of off-trail use by horses. Although off-trail use is not appropriate for either hikers or horses, the horses cause considerable damage to the soil.

Consider method to educate horse rider of the considerable damage caused by riding off-trail with their horse.

Consider high fines for off-trail horse riders to help make it clear that activity is particularly inappropriate.

Thank you for your consideration,

Andy Kean

14710 Beeler Canyon

Poway, CA 92064

858-386-8990



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: April 2, 2014

**NOTICE OF PREPARATION (NOP) OF A
DRAFT ENVIRONMENTAL IMPACT REPORT AND
SCOPING MEETING NOTICE**

WBS No.: S-01014.02.06

The CITY OF SAN DIEGO (City) as the Lead Agency under the California Environmental Quality Act (CEQA) has determined that preparation of a Program Environmental Impact Report (PEIR) will be required for the **MISSION TRAILS REGIONAL PARK (MTRP) MASTER PLAN UPDATE (MPU) AND NATURAL RESOURCES MANAGEMENT PLAN (NRMP)**, as further described below.

This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego web-site at the location noted below and distributed on **April 2, 2014**.

City website: <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>

NOTICE OF PREPARATION (NOP) COMMENT PERIOD: Written comments from responsible and trustee agencies, the public, and interested parties on the scope and content of the draft EIR must be received by the Development Services Department no later than **30 days** after receipt of this notice (**April 2, 2014**). Please send your written comments to the following address: **Myra Herrmann, Senior Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or **submit via e-mail your comments to DSDEAS@sandiego.gov referencing the Project Name and Project Number in the subject line**. A draft Program EIR incorporating public input will then be prepared and distributed for public review and comment in accordance with CEQA.

RESPONSIBLE AND TRUSTEE AGENCY: Pursuant to CEQA Section 15082(b), the City requests your input on the scope and content of the environmental information pertaining to your agency's statutory responsibilities in connection with this project. Your agency may need to use this EIR prepared by our agency when considering any permit or other approval for the project.

Documents related to the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) are available for public review at the City of San Diego Development Services Center, 1222 First Avenue, San Diego, CA 92101, and can be found on the following City website:

<http://www.sandiego.gov/planning/programs/parkplanning/index.shtml>

SCOPING MEETING: In accordance with CEQA Section 21083.9, a public scoping meeting will be held by the City of San Diego's Development Services Department on Thursday, April 17, 2014 at 6:00 p.m. running no later than 8:30pm in order to gather comments relating to the proposed Mission Trails Regional Park Master Plan Update and Natural Resource Management Plan scope. The meeting will be held at the Mission Trails Regional Park Visitor and Interpretive Center, located at One Father Junipero Serra Trail, San Diego, CA 92119.

A. THE NO PROJECT ALTERNATIVE

This alternative will analyze a continuation of the existing conditions within MTRP at the time the NOP is published, and what would be reasonably expected to occur in the foreseeable future if the Project were not approved (current Master Plan but no NRMP) with the existing community plans. This alternative will compare the projected impacts of the change that would result from Project approval against impacts that would occur under the existing Master Plan. Should the No Project Alternative prove to be the environmentally preferred alternative, then CEQA requires that another environmentally preferred alternative be identified for the Project.

B. REDUCED PROJECT ALTERNATIVE

This alternative would analyze implementing a MPU/NRMP with similar but reduced uses than the draft MPU/NRMP. This alternative may or may not include community plan technical amendments, depending upon where the plan area modifications occur. As with the proposed Project, this alternative would be fully consistent with the Environmentally Sensitive Lands Regulations (ESL) including encroachment allowances permitted for steep slopes, wetlands, and sensitive biology, and consistent with the Historical Resources Regulations for archaeological sites, without the need for deviations or variances in order for park projects to be implemented in the future. This alternative will consider the impacts of a reduced project which includes a land use plan and policies that reduce significant impacts for the same issue areas as analyzed for the Project at a programmatic level and should not be developed to reduce or avoid impacts of a specific project or project level concerns.

Recommended Finding: The recommended finding that the project may have significant effect on the environment is based on an Initial Study which identified potential significant environmental impacts in the following areas: *Land Use (including MSCP/MHPA, ESL and Historical Resources Regulations), Biological Resources, Transportation/Circulation and Parking, Visual Affects/Neighborhood Character, Noise, Historical Resources, Hydrology/Water Quality, Geology/Soils, Paleontological Resources, Public Services, Human Health/Public Safety, Air Quality/Odor, Greenhouse Gas Emissions, and Public Utilities.*

Availability in Alternative Format: To request this Notice, the Scoping Letter, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE). **Additional Information:** The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. Contact Senior Planner, Myra Herrmann at (619) 446-5372 or via email at mherrmann@sandiego.gov for any information regarding the environmental review of this project. For information regarding public meetings/hearings on this project, contact Project Manager Jeff Harkness at (619) 533-6595 or via email at jharkness@sandiego.gov.

Cathy Winterrowd
Deputy Director
Planning, Neighborhoods & Economic Development

Attachments: **FIGURE 1:** Proposed Boundaries of Mission Trails Regional Park
FIGURES 2-7: Plan Areas within Mission Trails Regional Park
Scoping Letter

Distribution: **SEE ATTACHED**

MISSION TRAILS REGIONAL PARK

5.7. WEST SYCAMORE

Habitat and species preservation were the driving force behind the acquisition of the West Sycamore area. Public access and recreational use must be viewed as secondary uses. Recreational trails are identified as compatible uses within the MSCP, as long as they do not compromise the long-term ecological values of the area. Planning and implementing ecologically appropriate recreational trail loops is the focus of park planning efforts within this area, and connecting to adjacent County trail systems.

Multiple length trail loops are a key planning concept for this area to discourage continued recreational trespass into MCAS Miramar that is currently highly prevalent within West Sycamore Canyon. Multiple connections with Goodan Ranch Sycamore Canyon Preserve and Beeler Canyon would significantly contribute to this concept. Lastly, providing east-west connectivity for the County of San Diego's Trans-County Trail is a priority.

West Sycamore currently contains several utility access roads, a few old ranch road and fire breaks, and several miles of newly constructed trails. The utility access roads are primarily located along the ridgelines and are being jointly used as recreational trails.

Figure 5-6 shows the location and general extent of the proposed projects that have a specific location. Table 5-1 in Appendix F summarizes the projects, potential impacts, and restoration potential. Impacts to habitats and sensitive species will be minimized and appropriate mitigation measures to comply with MSCP and CEQA requirements will be provided as part of the implementation process of each recommendation.



West Sycamore (Source Bing 2012)



2013 MASTER PLAN UPDATE

5.7.1. PLANNING RECOMMENDATIONS:

WS-P1: The eastern slopes of West Sycamore should remain in their near-natural state, due to the sensitive visual character of the area.



Eastern slopes above Goodan Ranch (WS-P1)

WS-P2: Continue to coordinate with the County of San Diego on the implementation of the Trans-County Trail and designate one or more sections of trail through the West Sycamore area as required to provide east-west connectivity.

5.7.2. MANAGEMENT RECOMMENDATIONS:

No specific management recommendations unique to the West Sycamore Area were identified during the development of this MPU.

5.7.3. FACILITY RECOMMENDATIONS:

WS-F1: Provide a restroom, ranger office, hitching posts, shade structure, and picnic tables at the West Sycamore staging area.

WS-F2: Acquire an access easement near the intersection of Beeler Canyon Road and Sycamore Canyon Road and construct a trailhead with informational kiosk.

WS-F3: Consider providing fire resistant shade structures consistent with the MTRP Design Guidelines (Appendix G) at a central location within the West Sycamore area where appropriate.



Location of future staging area improvements (WS-F1)



MISSION TRAILS REGIONAL PARK

5.7.4. HABITAT/SPECIES RECOMMENDATIONS:

WS-H1: Plan and implement a removal and control program for Artichoke Thistle (*Cynara cardunculus*).

WS-H2: Manage the density of woody and herbaceous vegetation within Coastal Cactus Wren management areas.

WS-H3: Remove exotic weeds from the Coastal Cactus Wren management areas.

WS-H4: Transplant prickly pear and cholla cactus pads into the Coastal Cactus Wren management area to increase the density and quality of cactus wren habitat.

WS-H5: Conduct habitat restoration or revegetation activities within disturbed areas as needed.



Artichoke thistle (WS-H1)



Coastal Cactus Wren Management Area (WS-H2/3)

5.7.5. RECREATION RECOMMENDATIONS:

WS-R1: Construct a new section of hike/bike trail between the proposed staging area and the utility access road west of the end of Stonebridge Parkway.



A trail is recommended along the main access road (WS-R1)



2013 MASTER PLAN UPDATE

WS-R2: Construct a new section of multi-use trail from the proposed staging area to the west down into Beeler Canyon.

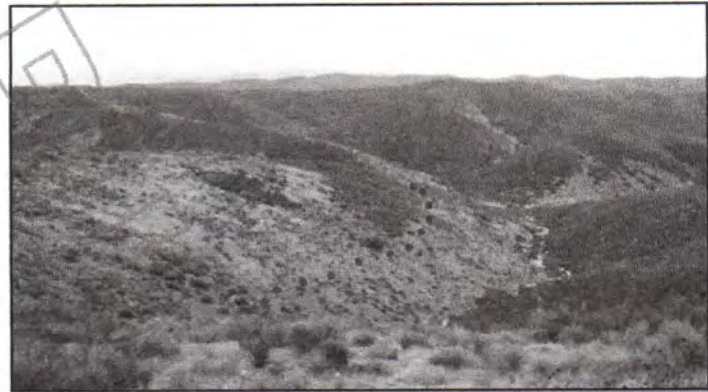
WS-R3: Collaborate with the County of San Diego to construct a new section of multi-use trail from the West Sycamore Canyon Loop trail down into Goodan Ranch Sycamore Canyon Preserve.

WS-R4: Construct a new section of multi-use trail between the two ridgelines of West Sycamore Canyon to create the West Sycamore Canyon Loop trail that discourages trespass into MCAS Miramar. Planning and design of this trail will need to address issues associated with proximity to willowy monardella habitat.

WS-R5: Close and restore a section of existing park access road that is no longer necessary.



A new trail is recommended along the northern facing slope from the staging area down to Beeler Canyon (WS-R2)



A new trail is recommended from the utility access road on the main ridgeline near the border with MCAS Miramar down into and connecting with the Goodan Ranch Sycamore Canyon Preserve trails (WS-R3)



A new trail is recommended to interconnect the utility access roads on the ridgelines along the southern park boundary with MCAS Miramar (WS-R4)



Figure 5-6: West Sycamore Area Recommendations



Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resources Management Plan Project No. 349988

Submitted By: Lee Campbell 858-752-3655

The comments provided in this submittal are focused primarily on the MTRP as it relates to the community of Tierrasanta. However many of the comments can apply to other communities of San Diego. This focus is primarily related fire threat.

Introductory Comments

The situation with fire risk due to the fuel load of MTRP and park resource management/ brush management has always been a touchy and political subject. In the past when discussed with persons close to the park some responses have been; 'But it is a park!'; '...but fires don't usually originate at MTRP'; the park was here first and the homes should never have been built there'. And truly maintaining the park to try to reduce fire risk to the surrounding communities does involve changing the character of the park. Resistance to this is probably a reason why a plan that was announced more than 5 years ago to work with City Fire to develop emergency response /brush management plan for MTRP has not happened. I see it addressed in the MTRP NRMP that this is still the plan. It can not wait any longer. It has become more essential as time goes on and we are unquestionably aware of the affects the of climate change.

The community of Tierrasanta and others have done there part with regard to replacing the shake roofing and for the most part supporting 100ft defensible space requirement by preparing their own property up to City property and working with City brush management crews finish the defensible space into City wildland. Of course frequent reminders are necessary to ensure that this process continues (and structures could be further hardened against fire to no end). But even with this homes and businesses will still be at risk because of flying embers, heat and flames that can reach from far into the park into the communities.

So what is the answer with more dead and weakened vegetation to be expected year-round in the park:

- a. The MCAS Miramar has in the past a plan of reducing risk by breaking up large stands of brush with machines called masticators. There are other methods of thinning the brush also. This could be implemented in the more interior portions of the park working to the perimeters. The mulch produced is spread to the soil.
- b. Another thought is to provide a firebreak buffering the communities from the most near threats with grass, natural soil and low natural brush. This could be accomplished in part by providing picnic and camping facilities (mentioned in the text of the plan but not to address fire risk) at the perimeters allowing for a vegetation transitioning to the inter park.

- c. In areas where it is infeasible because of terrain, brush management / defensible space project training could be conducted for city personnel and fire crews. Volunteer groups like the community fire safety organizations, CERT and scouts could benefit.
- d. Fire sensing cameras and weather stations for monitoring conditions should be installed similar to the SDG&E system on Fortuna Mt.

In a worst case as climate changes and rainfall is nil, there may be very sparse vegetation remaining and we would be left with a dustbowl.

General Comments

1. This Mission Trails Regional Park Master Plan Update document reads more like a proposal for a master plan than a plan itself. There are many 'requirements' that are not documented in a tabular form with responsibilities and time lines for status reviews and completion. For example, Section 3.5.5 first paragraph states,
 "The staging area is being developed in phases under the City of San Diego Site Development Permit #40-0524 and will eventually contain equestrian parking, corrals, an administrative building, storage facilities, and a covered group picnic area".

Table 5-1 appears to be a form of requirements traceability for requirements introduced in the plan but primarily focused on habitat projects with the equestrian related projects only listed requirements should be traceable with a requirements traceability matrix/plan that is tabularized with milestone schedules and accountable organizations. If this isn't done and made part of the plan the document will always be a wish list and subject to re-statement in the future 'plan'.

The requirements traceability table for facilities should be separate for habitat traceability. Each location in the document should be noted. For example, requirement FM-F1 should trace to para 5.5.3 and 3.5.5 at least. Separate requirements should be identified for equestrian parking, corrals, etc. since it appears that they will not be all done as a single project. Searching the document for the word 'will', for example, may pop up additional requirement references.

2. MTRP is part of the Tierrasanta community plan area and the Master Plan should include consideration for the business and residential portion of the community plan area. Also the 'New' (or perhaps mythical) Tierrasanta Community Plan should be produced with more attention to MTRP.
3. MTRP along with the MCAS open space is the greatest threat to the communities of Tierrasanta, Kearney Mesa Clairemont and others due to the amount of seasonal (which really is year round anymore) dry and dead

vegetation. This vegetation is not managed for community fire threat except for MCAS that has a resource management program that helps mitigates fire threats with the acceptable method of brush reduction using large brush masticators. These machines reduce large stands of brush to pulp.

4. If procedures are already in place then indicate where the procedures and policies can be found; don't use 'Continue to...' e.g, 'prohibit all off-road vehicle use within the park'. These requirements that are said to be continued should be identified as requirement and if they go on forever then should be scheduled as ongoing with periodic dates for review or status.

Specific Comments

Outside Cover

1. Include a view from MTRP Fortuna Mountain across the business and residential portion of the community Plan

Introduction

1. para. 1 page 1.1 - Change "Although largely surrounded by residential development, the park contains ..." to Although largely surrounded by residential and business development, the park contains ..."
2. para. 2 page 1.1 – Change "Mission Statement: "Providing recreational and educational opportunities while protecting historical, cultural and natural resources for future generations." to "Mission Statement: "Providing recreational and educational opportunities while protecting, maintaining and managing the park's historical, cultural and natural resources for future generations and proactively addressing the threat to the surrounding communities due to wildfire ."
3. para. 3 page 1.1 – Change to read, "Since 1974 the remaining portion of the Tierrasanta Community Plan Area adjoining MTRP, Scripps Ranch and other portions of surrounding communities have been developed into thriving commercial and residential neighborhoods."
4. para. 4 page 1.2 – Change to read, "It is a fragment of wildland in the city where people are able to enjoy natural chaparral wilderness, recreational, and educational activities that would otherwise take them many miles away, and to many different locations."
5. para5. page 1.2 – Change to read "The actions associated with the NRMP are required inter-related management actions intended to protect and enhance the natural resources within MTRP in compliance with the requirements of the MSCP program and manage the wildland vegetation in a manner to provide balanced natural resource management and wild land fuel management."

History

COMMENT: Address climate change. Not year round fire season as in the past. Tables showing rainfall over the years would be helpful.

COMMENT: Much of the history related to the 1985 plan could be moved to the appendix section. A comparison of what was accomplished from 1985 to in a table would be useful. This applies to other sections also such as where workshop activities are discussed.

Chapter 3 Existing land use

1. General Comment: Add ability to click to expand photo views of the park in higher resolution with same for nearby parts of the community would allow the reader to get a better perspective of the park related to residential and business developments.
2. para 3.1.9. page 3-18 – If possible, add a photo similar to the photo 'Southwestern Face Cowles Mountain' showing a view from the Tierrasanta residential community to Fortuna mountain area to complement the Fortuna Mountain area discussion on page 3-18.
3. para 3.1.10 page 3-20 - Emergency roads and fire access need to be added or identified in the plan including emergency air lift/ helicopter landing sites to allow for removing injured or lost, etc. visitors. Both primary and secondary accesses need to be reviewed periodically for serviceability to the emergency responders. Dirt roads need to be reviewed on a more frequent basis when they are designated for emergency use. Maps should be provided in the plan showing the accesses for emergency use. Reference appendices if they provide this info.
4. para. 3.1.10 pages 3-20, 21. –
 - a. The park entry views particularly the 'Fortuna Mt at Clairemont Mesa Blvd.' picture should be replaced to show a broader view of the terrain in the background. By using higher resolution photos the reader can expand to see details if desired.
 - b. Please identify similarly as requested above the Calle de Vida and Colina Dorada entrances to MTRP
5. para 3.1.10.-11 . tables 3-1, 2; figure 3-11 –
 - a. Identify several roads within the Fortuna area that can be used for emergency / fire purpose; the number of miles of these roads. Include vehicle type and size/weight that can be supported by these roads. Include turnarounds; pullouts etc. Work with the fire and police dept to plan for road additions that can be introduced later in the plan for road improvements.
 - b. Identify the maintenance plan for roads and trails throughout the park including emergency agency assessment.
 - c. Identify the plan for reducing, preventing and monitoring of unauthorized user created trails.

6. para 3.5. Fortuna Mt. - Change to read, 'The Fortuna Mountain area is bounded by residential uses on the west within the Tierrasanta community having a population of approximately 85,000 and 31,000 households and'

7, para 3.6 East Elliot -Change to read 'The East Elliott area is bounded by residential uses on the east within the City of Santee, the six-lane SR-52 on the south boarding the community of Tierrasanta with a population of approximately 85,000 and 31,000 households and MCAS Miramar to the north and west.

Chapter 4 Planning and Analysis

4.01 Objectives page 4.1

Comment: A 5th objective should be added:

"5. Be a good neighbor to the surrounding communities in terms of emergency access and fire safety."

4.02 CONCEPT para 2.0 page 4.1

Para 1. Item 2. states," The Park orients outward to the region; and is not to be viewed as an "island."

COMMENT: This master plan treats MTRP as it is an 'island' - communities are fogged out and are poor of resolution in the illustrations; bikeways links external to the park are not shown or referenced; trails linking to the park are not shown or referenced, bus routes are not shown or referenced. Also discussions of fire are only addressed related to restoration of the park after a fire.

1.1"Trail corridors should extend outward to existing and future residential areas wherever compatible."

COMMENT: Trail corridors do extend into the community of Tierrasanta and should be referenced and shown e.g. Shepherds Canyon Trail, Rueda Canyon Trail. Recognize the communities and their features, i.e, community trails related to the features of MTRP promoted by the plan. Also the park provides a service and without the communities supporting the park there would be no need for the park.

Para 3. Response to Environment –

States, "The Park will continue to protect environmental and cultural resources while providing for recreational opportunities."

Comment: MTRP has a fire environment most times of year. How does MTRP respond proactively to the fire environment? Restoration after a fire may not be the best solution for fire safety. Maintaining invasive plants that take hold to a 3 or 6 inch may be worth consideration.

Para 4.03 Assumptions

Add assumption 4.

“The climate is changing, whether natural or caused by humans. As such, current natural vegetation will probably cease to thrive and more dead and dying plants will be the norm across the entire 8,000 to 10,000 acres. Restoration of these plants in areas of the park will then certainly be cost prohibitive and the dead plant debris at the edges of the park at the community borders will become a year-round threat as fuel for fire. At the same time, the amount of state and federal funding assistance will be aggressively pursued by both the City and County to be used to assure MTRP responds proactively to fire threats and for restoration efforts after the fires.”

Comment: Dead plants should be reduced to a 3 or 6 inch level within a 300 ft perimeter from communities.

Pages 4-6; 4-10; 4-12 Photos

Comment: These photos are not typical with green vegetation. The reader will assume that vegetation in this ‘near-arid climate’ does very well without moisture. Pictures should be included showing the environment during the typical many months of dried and dormant brush – or show both before the rains and after the rains. When were the pictures showing a greened MTRP? How long were they green?

Para 4.1.1 Population Growth

Last paragraph 3rd sentence states, ‘Public concern over growth, traffic congestion and energy costs will increase demands for open space and recreational opportunities close to the heart of the metropolitan area’.

Comment: Most people will need to be working more than one job to make ends meet and will not have time to take advantage of the MTRP as it is designed today. People may be looking for more campsites, picnic grounds (pet restricted in cases of small children) and in addition more nature centers (instead of the remote location off of Mission Gorge Road). The facilities should be integrated near the public transportation routes and the border/entrances MTRP wild land with minimum imposition on privacy or security of the surrounding residential areas. (Consider the MTRP Tierrasanta trail entrances and the city 200 acre designated park area and vacant school district property camp Elliot parcel, for example.) These integrated parks and facilities could be structured as buffer areas as fire defensible space for the bordering communities and provide an incentive to schools and non-profits to join or create programs to help sustain and maintain MTRP.

Para 4.1.3.1 Image Analysis

First sentence states,” Mission Trails is an important visual resource, both as a mountain ridgeline backdrop to the urban setting, and also as a retreat from the urban environment because of its secluded, interior canyons and valleys.

COMMENT a.: “Because the canyons are secluded the threat of fires started and stranded hikers in these locations is higher because they may not be detected before its too late. Weather station systems with cameras and artificial intelligence analysis subsystems should be installed at appropriate locations and monitored by trained personnel.

Page 4-8 Comment: Top of page 4-8 –

Add:

- The perception of an unmanaged wildland during most of the year when viewed from a wild fire safety perspective by the people living in the residential developments on the park boundary.

Comment: The bulletined list is not needed since nothing in the list will be remedied soon but the ‘hard edge; of the communities could be pushed back by a fire.

Para 4.1.3.5 Vegetation and Wildlife

4th paragraph change to read, ‘Certain areas of the Park deserve special consideration to preserve and/or manage environmental resources: the San Diego River riparian area; Kumeyaay Lake; the more protected drainages and slopes of Fortuna and Cowles Mountains; and the more protected drainages within East Elliott and West Sycamore; and (referring to *Figure 3-32: Fortuna Mountain Vegetation and Sensitive Species*, page 3-68) the southwest facing border of the park at the urban/developed interface in the Tierrasanta community plan area, inhabited by Diegan coastal sage scrub, non-native grasslands, southern mixed chaparral, scrub oak chaparral and the disturbed habitat.

Para 4.1.4 Recreational Trails Planning

Comments: Planning for trails need to include emergency access
Identify emergency helicopter landing areas.

Added ‘you are here’, maps/kiosks should be installed at viewpoints with emergency information brochures, doggie poop bags etc.

Para 5.1 Overall Park

Comment: This plan should be beyond listing broad recommendations – what is the plan, schedule etc.

Para 5.1.1 General recommendations:

Sub para 1 states, ‘Aspire to serve the comprehensive recreation, education, and cultural needs of the San Diego region and be available for other uses as appropriate or necessary.’

Comment: What is the plan - How is this to be done?

ADD:

6. Perform brush management based on a program of continuing assessments of current and projected threat of wildfire to the park and adjacent residential and business communities.

Page 5-2 ; **para 5.1.2 Planning Recommendations**

Sub para. 3. Change to read: ' Incorporate trail linkages and public recreation into new 'and existing' developments adjacent to the park.

Sub para. 8. Change to read: Cluster intensive recreational uses near to the park access points but far enough away from the access points that the users feel that they are in the park', and where the activities generated are not obtrusive to nearby residents such as staging and group picnic areas, to minimize park roads and infrastructure costs.

Add – 17. Provide a system of rainwater collection for new planting and re-planting areas, etc.

Page 5-4; **para 5.1.3. Management Recommendations:**

Photo of road with caption, 'Utility road maintenance grading has created berms along the edges preventing proper drainage.'

Comment: What is proper drainage? What is wrong Show an example of what is correct. Unpaved roads will naturally puddle. This road appears to me to be a very good example of of an emergency access/ utility road.

7. Develop an emergency response plan for the park in collaboration with San Diego Fire and Rescue.

Comment: This should be done and included now. What is the schedule for this? The MTRP master plan is not complete until this is done.

Page 5.5 **para 5.1.4 1.**

Sub para 1 states' 'Continue to use existing funding sources, such as the MTRP Antennae fund ...'

Comment: What is the Antennae fund? Could it be used for fire sensing/weather stations?

Page 5.6; **para 5.1.5. Facility Recommendations:**

ADD 17- Conduct brush management around all Park to residential communities to provide an additional buffer from MTRP fuel loads. This additional buffer will include service roads designed to support appropriate emergency vehicles.

Add: 18. Provide a system of rainwater and grey water collection at all facilities. Include community support programs for such systems.

Appendices

Comment; Since there will be a fire/brush management plan someday please include a placeholder to show the MTRP master plan is not complete

Appendix D Good Neighbor Policy

Comment: The title of this section should be San Diego County Water Authority Good Neighbor Policy Agreement for MTRP

Comment: MTRP should provide a good neighbor policy that goes both ways that shows e.g.;

- Concern about residential community fire safety like:
 - a. providing a high resolution fire history map that does not de-emphasize (does not shade out) the neighborhoods on the borders of the Park.
 - b. Providing a fuel reduction plan that shows high fuel areas of the park that needs addressed with areas prioritized
- Outreach by supporting and attending residential community events promoting the park and to understand the needs of the residential communities;
- Trail systems integrated with community trails;
- County Fire safe council presence/ membership on the CAC;
- etc.

Appendix F; Page 9

Comment: Shouldn't brush management for Fortuna area be addressed?

Appendix A-D; para AD 3.3 fire suppression priority areas (habitats)

COMMENT: Should be divided into 2 sections with one section covering human and property fire suppression priority.

Thank you
Lee Campbell

From: Danewtonjr@aol.com [mailto:Danewtonjr@aol.com]
Sent: Monday, April 28, 2014 3:42 PM
To: DSD EAS
Cc: Councilmember Sherri Lightner; Councilmember Ed Harris; Councilmember Todd Gloria; Councilmember Myrtle Cole; Councilmember Mark Kersey; LorrieZapf@sandiego.gov; Councilmember Scott Sherman; CouncilMember David Alvarez; CouncilMember Marti Emerald; KevinFauulconer@sandiego.gov; editor@sddt.com; steveg50_94609@yahoo.com; Lorraine.Ohrmund@att.net; greg@photostone.com; Richard@chloee.com; 18882@adelphia.net; akorobk1@san.rr.com; msbarghout@att.net; stnesoup@aol.com; bill@gigasavvy.com; Ecneen@sbcglobal.net; frankhfa@cox.net; fayegail@mind.net; bob@kenniston.net; topsy@cox.net; sdkarol@yahoo.com; Ladydi727@aol.com; rvafi@hotmail.com; DHSZM@AOL.COM; JMurphy@ieee.org; LloydNewport@verizon.net; captnormanpetersen@hotmail.com; Pringle760@cox.net; Tneff@urcad.org; shelleywalsh@mac.com; meliorations@cox.net; akek@cox.net; akipaul@dslextrême.com; MiriamJ.Mandell@gmail.com; michaelkevinwalsh@hotmail.com; Steve@paylessrates.com; leeneez@aol.com; muglady3@comcast.net; kbind@gvvc.com; abcdew@earthlink.com; turbinean@cox.net; BKogler@aol.com; primewestpat@hotmail.com; Toddrossman@verizon.net; katerossman@verizon.net; LEC04747@pomona.edu; Mark@charles-company.com; dave@daveampac.com
Subject: Re Mission Trail Regional Park and East Elliott

Attn: Ms Myra Herrmann

Senior Environmental Planner, City of San Diego, et al

1222 First Ave, MS 501,

San Diego, CA 92101

Dear Ms. Herrmann, City of San Diego, Mayor and City Council members:

As a part owner of a land parcel in East Elliot Property (Parcel 366-080-20-00), I am writing my comments, regarding the Subject City project known as the Mission Trails Regional Park, to you as you requested

For four decades you have been gradually taking the property referred to as East Elliott by governmental, bureaucratic and environmental action. You have prevented any reasonable development. Now, you want to make a park out of our property. If you want to use our property for a park then pay us for it. I know that the State of California and its governmental agencies, including the City of San Diego and its agencies, have no regard for the U. S. Constitution, Fifth Amendment because it provides- The [Supreme Court](#) has held that the federal government and each state has the power of [eminent domain](#)—the power to take private

property for "[public use](#)". The *Takings Clause*, the last clause of the Fifth Amendment, limits the power of eminent domain by requiring that "just compensation" be paid if private property is taken for public use.

You want to make our property a public trails park - pay for it.

Sincerely,

Douglas A Newton, Jr.

3260 Rustic Oak

San Antonio, TX 78261

210-771-3711

May 2, 2014

Property Owner – Parcel # 366-070-65-00
Jack Zarour
P.O. Box 23877
San Diego, CA 92193
(619) 244-3187 meliorations@cox.net

Response to:
City of San Diego
Development Services Department Environmental Analysis Section (DSDEAS)
Public Scoping Meeting - MTRP/MPU/NRMP Project No. 349988 Date: April 17, 2014

Attn: Myra Herrmann, Senior Planner/Archaeology, Honorable Mayor Kevin Faulconer, Esteemed City Council Members Sherri Lightner, Ed Harris, Todd Gloria, Myrtle Cole, Mark Kersey, Lorrie Zapf, Scott Sherman, David Alvarez and Marti Emerald

Ladies and Gentlemen:

The following written response contains a little bit more detail than what I had presented in the three minutes of public comment at the ill-advised meeting of April 17, 2014 at 6 PM. Your failure to act on the request and the Divine Directive to change the meeting date since that Thursday night was Great and Holy Thursday reminds me of a quote on a tombstone I had once read, "Man makes plans and God laughs." As I had written to you before, "plans made that night will prove to be a failure, much like the Tower of Babel"; and "If the City staff [especially the Senior Planner] is 'unaware of Holy Week' on the calendar, how can they be trusted to handle any sort of business whatsoever?" This letter is intended to help you to perhaps realize what you are up against.

1. On April 17, 2014, Great and Holy Thursday, while one third of the world, Christians, were preparing for the following Sunday, Easter Sunday – the glorious resurrection of God in the Flesh, Jesus Christ, a celebration day of victory over death, we were in a meeting called by City staff to give public comment as per the Notice of Preparation (NOP) for the subject of the Mission Trails Regional Park (MTRP) Master Plan Uptade (MPU) and Natural Resources Management Plan (NRMP) – Project #349988. While some Christians would be killed that night for their faith in other parts of the world, the City of San Diego was desperately looking at ways they can legitimize their wishes over property owners and add land in the East Elliott Planning Area into MTRP. As I have written to you before, "Also for the record, the city [City of San Diego] is free to plan whatever it desires on land that the City owns; however, if the City does not own a parcel of land, it has no business including it in any plans." In the City's presentation that night (pages 1 and 6) showed maps of East Elliott with various trails, some of those trails going through our property and other private property. In reading about East Elliott and the proposed area north of Highway 52 (which includes our property) to be added to MTRP, MTRP literature clearly states these trails to be "unauthorized trails", but as I have written to Mr. Chris Zirkle, Deputy Director City of San Diego Park and Recreation Department, the action of the City of San Diego of furnishing and maintaining the dirt roads onto our property with non-native rocks speaks much louder than all your documentation. I added, "By not gating the north park border to prevent the public from trespassing on private property, the City of San Diego is not only permitting the public to trespass, but actually encouraging the trespassing and is liable for

any [injuries and] prescriptive easements that may have been created by the City's negligence, knowingly or unknowingly." Did anyone in the City of San Diego ever ask me or any of the land owners if we wished to be included in the MTRP? "NO." Or if the City could install trails on our property? "NO." Did anyone get permission from the property owners? "Again, No." How would you like it if I decided to walk across the front lawn of your house every day for years, and then begin camping there? Would you allow me to do whatever I want with your front yard? Would I then be allowed to keep your front yard? Are you beginning to see that there is something wrong here?

2. Without going into the extensive history of East Elliott, one can see the systematic incalculable economic damage done to the current property owners and past property owners who purchased land in the early 1960's from the General Services Administration with maps containing such slogans as, "Take advantage of this GOLDEN INVESTMENT OPPORTUNITY", and "Take advantage of this opportunity! CALIFORNIA! LAND OF INVESTMENT." While others profited greatly when their land was developed in what is now Tierrasanta, Mira Mesa, Scripps Ranch and other areas, the City of San Diego has effectively killed all development of East Elliott over the years. When the Multiple Species Conservation Plan (MSCP) was introduced in the early 1990's, I spoke out against the plan because it failed to address the most important endangered species of all – the tax-paying property owner! In the meetings two years ago with Cogentrix, the company who the City of San Diego was considering to put a heavy-industrial use power plant in the 'open space', I had to bring up the "Elephant in the Room", the property owners. Everything conceivable was discussed in those meetings, except adequate compensation to the property owners, where I even suggested, that should the power plant be constructed, the East Elliott land owners and previous land owners should be on a profit sharing plan to recoup their losses for not being able to develop their land. During the NOP meeting on April 17, 2014, the NRMP representative gave an eloquent presentation, "a priority one directive", about the various habitat and even had one picture of a native for his 'habitation' portion of his talk, yet, once again, he provided nothing about the landowner species. Just for the record, our parcel as well as other privately owned parcels in East Elliott, are not 'open space'. These parcels are still zoned residential RS1-8, although the City of San Diego over the years has forced previous owners to become 'willing sellers', who in turn, sold to the City of San Diego or to the landfill (Waste Management) at mitigation value, \$15,000.00 to \$35,000.00 per acre while residential vacant land in the City of San Diego has been selling for over \$600,000.00 per acre and in the millions of dollars per acre in some locations, then if the City of San Diego wants to do anything with these parcels, the property owners need to be justly compensated, whether they choose to be 'willing sellers' or not. If the City of San Diego has permitted the landfill, a heavy-industrial use facility, to more than double in size over the years in what it considers 'open space', and is providing trails and roads for hikers and mountain-bikers, while at the same time preventing land owners in East Elliott from developing their property and enjoying proper financial benefit from the same, it is intuitively obvious that the City of San Diego is under the influence of special interest. Before any planning is to be considered, this incalculable economic damage done to the land owners must be rectified, and an equitable, adequate compensation must be put in place by the City of San Diego to pay restitution to the current landowners and past owners, and estates of deceased owners who were discriminated against for not being able to see their land develop. This restitution must be in the form of monthly payments, much the same as the Federal Government is giving to the Native American Indians as compensation, and this is the right thing to do, and it should not require a class-action suit before this happens. The City of San Diego must do the right thing, no matter how difficult it may be, doing the right thing is not easy. What has been done so far to the property owners

of East Elliott is unjust, un-American and most of all un-Godly! Although, one may never understand why this is so, I am certain God will bring good out of it all.

3. As for our family history, the parcel of land was first purchased by my late father, Louis Yacoub Zarour, and has been in the family for over 32 years. After many years of not being able to develop his land, he gave up and became a 'willing seller'. After two listings with Jerry McCaw in 2008 and 2009, the property was in escrow in October of 2010 to be sold to the City of San Diego at the mitigation value of \$35,000.00 per acre (9.27 acres) along with 9 other parcels by other 'willing sellers'. At age 85, I did not want to get my father's hopes up that the sale was done until escrow actually closed, but the agent, Jerry McCaw, insisted it was a done deal, "we're just waiting for a signature from Fish and Game," he said, and to go ahead and give the good news to my elderly parents that their land will be sold. Shortly after getting their hopes up, Jerry called just before Christmas, to give me the bad news, the City of San Diego pulled our parcel and two others out of escrow and bought other property in Otay Mesa instead. This news was too much for my father to handle. His hopes were shattered once again, he did not care to even eat or take care of himself anymore, within weeks, the man who survived wars, was a prisoner of war, fought cancer three times and won, dwindled down and went into the hospital in February and died February 13, 2011. The coroner's report says cause of death is pneumonia, but he died of a broken heart from never seeing his dream come true, and the City of San Diego has 'bloody hands' in his death and all other East Elliott property owners who went to their grave never realizing their dream. Since my father's death, we had attempted several times to sell the property to help care for my elderly mother and disabled sister. On May 10, 2011 I personally met with Mr. Lane MacKenzie, City of San Diego Asset Manager, who told me that the City of San Diego wanted the property but did not have the money and was waiting for grants and for me to make an offer below mitigation value, which I did in an email, but no response. One opportunity with an option to Mr. Dave Dilday of American Pacific Investments in May of 2011 and another with Larry Lynch of Lynch Development in November 2012, both did not conclude in a positive manner and ended up costing us legal fees. Again on July 24, 2013 I attempted to contact April McCusker, Property Agent Real Estate Assets Department for the City of San Diego, to possibly consider a sale/option agreement, but no call back. In August 2013, I had retained Attorney Steven McKinley, one highly recommended for negotiating a real estate sale or option with the City of San Diego, after several weeks and expenses, no deal was considered by the City of San Diego. Having exhausted and tested the spirit in this matter by November 8, 2013, it was revealed to me very clearly that this land was not for sale, and just in case, if you have not figured it out by now, the Zarour family is no longer a 'willing seller'. To honor my late father and our departed younger brother, U.S. Marine Corporal Edward Zarour, who died December 21, 1993 at age 23, a memorial Cross was placed on the property on December 14, 2013 and an Orthodox Christian Memorial Service and blessing of the Cross and the land on the 20th anniversary of his death, December 21, 2013. Since then, our family has drawn closer to the land and one of our relatives perceived that a church will be built on that site. The presence of the Cross on the land has been a blessing to many who have shared their opinion and were pleased to 'visit' the symbol of victory. On one of our visits, February 10, 2014 we discovered the wooden Cross broken, my children, our neighbor's children and one of their friends from church gathered around and we did the right thing, we prayed for God to forgive the person who did it, that's what Christ did on the cross, and that's what we did. We didn't report it to the authorities as a 'Hate Crime', or make an investigation, or contact the media and demand justice to find and punish the person, none of that. On February 15, Edward's birthday, we installed a new steel Cross which still stands till today and shall forever stand as a memorial not only to my father and brother, but to the Glory of God, for His work on it for our salvation as

well as a memorial of the injustice and harm done to all living and departed property owners of East Elliott. One day, on one of our visits to the Cross, we witnessed a mountain biker fall and remain motionless for about 5 seconds on the trail on our property, and before we could get to him, his friends helped him get back up on his bike and ride away. What would have happened if this man died on the spot, who would be liable for him? What if a snake bit someone on my property and did not get help? Who is liable? As I had written to Mr. Zirkle before as I had given notice to everyone present on the night of April 17, 2014, I had to post signs that read as follows: **“You are on PRIVATE PROPERTY at your own risk, with the permission* of property owner and the City of San Diego. (*Permission of property owner is granted in writing to those individuals who have signed a Release of Liability Form, obtained sufficient liability insurance naming property owner as additional insured and have paid the Daily Use Fee. To obtain your permission in writing, send your written request to property owner: Jack Zarour, P.O. Box 23877, San Diego, CA 92193. No one is authorized to be granted entry on this property without having written permission from property owner.) Posted April 16, 2014.”** As of today, I have not received a single written request for written permission. We have observed that some people see the signs and return while many others continue to trespass on private property. In addition, since posting the signs, I have not received any objection from the City of San Diego regarding the language on the signs, so I can then infer that as long as the City of San Diego does nothing to prevent the public from leaving MTRP on the north side onto private property, then the City will assume any and all liability.

4. With regard to the proposed ‘Master Plan’, I can only make it very plain and simple: the deception must stop. To restate it in a different way, “The City of San Diego must first make plans to correct the injustice done to the land owners. And don’t make any plans without including input of the land owners.” The City of San Diego is treating the land in East Elliott as a ‘bird in the hand’, but the City of San Diego will soon find out that it only has a “FIST FULL OF FEATHERS!” More importantly, God has a plan for our land and any ‘Master Plan’ you wish to consider must first include The Master, God Himself and His will, in your plan for it to succeed. Our land is spoken for by The Master, He has need of it, He has not allowed for it to be sold for a reason, so that it will be used as He allows, to be a place for His glory, for worship, reflection, repentance, reconciliation and of healing of soul, mind and body for His most precious creation, the important species, mankind. The first short term plan is for a chapel to be built, “The Meeting of The Lord Chapel” on the site of the Cross under the protection of the patron saint of the City of San Diego, St. James, the brother of the Lord, the patron saint of my father, my patron saint and that of my children – could this be a coincidence? “Not likely.” What will be planned next may organically develop as inspired by the Creator – not necessarily in this order: an Orthodox Christian Youth Camp, a cemetery, a home for the homeless where rehabilitation and help can be provided along with work, a monastery with the constant prayer necessary to maintain God’s Plan, a retreat or conference center. Of course this list is not exhaustive or complete, but is just a beginning.

In conclusion, all the existing departments in our City government, organizations and groups are to be commended for caring so much about all the species in MTRP and elsewhere, but God is not only interested in us taking care of His plants and His animals and His resources, He is going to be more interested and holding us accountable for the poor homeless man or woman made in His image and likeness laying on the street here on 16th and Island, or in war-torn countries all over the world or those mentally ill and imprisoned in institutions and most especially the orphaned children on the streets. So a choice must be made as to how to proceed from this day forward. It is clear the East Elliott property owners have suffered beyond measure, will the City of San Diego wish to fight in court and spend more

time and money trying to impose something that is built on deception and on the sand? Or will the City of San Diego wake up to the reality and Truth and be able to find a 'Master Plan' that is not only viable but necessary and offers best use for the most important resource, the people of San Diego and the East Elliott property owners? I hope you carefully consider what I have shared, remembering that I am just one landowner and there are many others who are far more intelligent and have a great deal more resources at their disposal. We can be enemies and get involved with lawsuits, fences, gates and destruction, and you will find yourself as successful as Goliath against David. Or we can work on solutions for the public to enjoy the beauty of 'open space' and at the same time compensate current and past owners for killing their hopes of building and allowing owners to build on their property to fully enjoy their property. Whatever course you choose to take, always remember, ultimately you will have to answer to The Judge of the universe on Judgment Day for every evil and good word or deed said or done. I pray that we all have more good deeds and words from this point forward to be ready for that day. I hope that this letter has helped you realize what you are up against. Let me know if there is anything I can do to help. I remain confident that only good will come of this.

Sincerely,

Jack Zarour
sdjames

SIGN IN SHEET

For the

MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE AND NATURAL RESOURCES MANAGEMENT

PLAN PROJECT - PROJECT NO. 349988

ENVIRONMENTAL IMPACT REPORT SCOPING MEETING

Thursday, April 17, 2014

Name (please print)	Address (please print and include City, state & zip code) or Email address
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Stephen Goldfarb	3153 Belle Isle Dr. San Diego 92105 stevegold@sbcsbcglobe.net
Jasmine Guffey	6665 Mission Gorge Rd Unit B-5 San Diego CA 92120
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Evan Solbiger	cv13@hotmail.com
Mark Schalte	7323 Rondel Ct San Diego CA 92119
Patty Mooney	11 11 11
Ben Storie	7555 Linda Vista #127 92111
KIRK BENNETT	7262 ALLIANCE CT. SD 92119 (KIRKBENNETT@COX.NET)
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SIGN IN SHEET

For the

MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE AND NATURAL RESOURCES MANAGEMENT

PLAN PROJECT - PROJECT NO. 349988

ENVIRONMENTAL IMPACT REPORT SCOPING MEETING

Thursday, April 17, 2014

Name (please print)	Address (please print and include City, state & zip code) or Email address
PAULINE KEDWARD	7467 MISSION GORGE, SANTEE pkedward@hotmail.com
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Tony Rolfe	3033 Fifth Ave #400 San Diego, CA 92103 sdmrtdb@gmail.com
Thomas Coad	10322 St. Charles way, Santa Ana, CA 92705 ctcoad@yahoo.com

SIGN IN SHEET

For the

MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE AND NATURAL RESOURCES MANAGEMENT

PLAN PROJECT - PROJECT NO. 349988

ENVIRONMENTAL IMPACT REPORT SCOPING MEETING

Thursday, April 17, 2014

Name (please print)	Address (please print and include City, state & zip code) or Email address
Dustin Sharp	4331 Avenida Gregory Spring Valley CA 91977 Peko.velo@gmail.com
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Lyle and Linda Cocking	4890 PENNO WAY San Diego, CA 92124
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Michael Coad	8116 Entrada De Luz East SD. CA 92122
Brian Cox	6837 Elaine Way SD, CA 92120
Marlin W. Burke	8323 Morning Mint Ct. San Diego CA 92119 ryguy7890@gmail.com
RYAN VALLEE	4124 4th AVE. SAN DIEGO. CA 92103

MTRP Scoping 041714

Myra Herman: Okay I'm going to go ahead and open this meeting at 6:05. Good evening and thank you for attending the City's Environmental Impact Report Public Meeting for the Mission Trails Regional Park Master Plan Update and Natural Resources Management Plan Project. My name is Myra Herman. I'm a senior environmental planner in the Development Services department and I'm also here representing the Planning Neighborhoods and Economic Development department. That's the new department I'll be in. I'm still learning that title.

The meeting that you're here for is referred to as an EIR Scoping meeting and is for the purpose of helping the city to define the scope of work for the EIR. This meeting is required by the California Environmental Quality Act for projects which may have statewide, regional or area wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold and has scheduled this meeting to gather public input prior to the preparation of the project's environmental document. Environmental staff are required by the City's municipal code to provide the public and decision makers with independently prepared environmental documents which disclose impacts to the physical environment. This information is used by the decision makers as part of the deliberative process in approving or denying a project. The environmental document does not recommend approval or denial but is provided as information on the environmental impacts of a project.

Now I'm going to just give a few comments about how the meeting is supposed to go and how it's conducted so that everybody understands the process. I'm going to first provide a brief description of the project followed by a short presentation by the applicant's consultant team. At the end of the meeting if time is permitting the public is welcome to review any of the materials provided by staff. If the PowerPoint is still up we'll keep that up for a little bit and you can ask additional questions for clarification. However, anything that occurs after the close of this meeting will not become part of the scoping meeting record. So if you really have a burning issue I would really suggest that you make sure to get that on the record or put it in the written comments on the sheets that are outside.

This meeting is designed to get as much public input on areas that need to be addressed in the EIR in the time allotted for this meeting, therefore each speaker is asked to introduce themselves, state their address and complete their comments within three minutes. We don't have a large crowd so if everybody were to speak we may be okay, but I may wind up having to shorten it if it looks like we're going to run into our time that we have to end the meeting. Initially the meeting is supposed to last about two hours. There was a typo in the notice, it should have been until 8:00. So hopefully we can get through this, because I don't want to keep everybody here past 8:00, but if we have to go over that time because it was in the notice we will, but I just want you to be alerted to that. As it gets close to 8:00 I'm probably going to see where things are and decide whether we can continue the meeting or not.

In addition to verbal comments which are being taped for the record, right here, there are forms available, they're on a table outside of the room, and you can provide written comments on there as well if you don't want to speak into the mic. We will need to have those comment forms submitted by the close of the meeting or you can mail them. I made them into a threefold and it

has my mailing address on one side, so if you fold it the right way and tape it and stick a stamp on it you can just mail it, you don't have to worry about it. Please remember to put your name and address on the sign in sheet before you leave the meeting especially if you'd like to get a copy of the notice of availability when the draft EIR is ready to be distributed for public review. Without that information you won't be notified. The sign in sheet also has hopefully enough room for an email address. So if you prefer your email then we can just send you that notice that way as well.

Please refrain from conducting a debate on the merits of the project at this meeting as this is not the purpose for tonight's gathering. Rather please focus your comments on those environmental impacts you would like thoroughly analyzed in the project's environmental document. Lastly I will be acting as the moderator and timekeeper of the duration of the meeting and therefore would respectfully request that you yield when notified that your three minutes are up. Thank you for your patience. We appreciate your attendance here and will not begin the project description by city staff and then a brief description by the applicant's consultant. So this is, so bear with me this is going to be a little wordy, but we have to, this is part of the formal process.

This meeting is being conducted in accordance with CEQA for the Mission Trails Regional Park Master Plan Update and Natural Resources Management Plan Project on April 17, 2014 at 6pm. This project requires city council approval of the master plan update and associated NRMP. Project site is within the neighborhoods of Rancho Encantada, Scripps Ranch, Tierrasanta, San Carlos, Lake Murray and Del Cero and within the Rancho Encantada, East Elliot, Tierrasanta and Navajo Community Planning areas within the City of San Diego and will require community plan technical amendments for Navajo, Tierrasanta, East Elliot and the Rancho Encantada Precise plan. The project can be separated into the five following areas. The current 5,242 acre Mission Trails Regional Park area, a 1,377 acre portion south of Scripps Poway Parkway and to the west of Sycamore Canyon open space preserve, a 2,697 acre area north of State Route 52 and west of Santee Lakes, a 142 acre area north of State Route 52 and the north and northwestern corner of the existing Mission Trails Regional Park and lastly south of the current park a 370 acre series of open spaces surrounding Lake Murray.

In 2010 the City of San Diego initiated a project to update the 1985 Mission Trail Regional Park Master Plan and develop a natural resources management plan. The purpose for the master plan update is multifaceted and includes the following. Fully incorporate the resource protection and management requirements of the multiple species conservation program into an NRMP for Mission Trails Regional Park and coordinate the recommendations and management actions between the MPU and the NRMP. Incorporate within the Mission Trails Regional Park boundaries and provide master planning for the management of resources and the development of recreational opportunities with lands acquired for preservation in the East Elliot community planning area while continuing to provide for potential private development per the current community plan and MSCP guidelines. Incorporate within the Mission Trails Regional Park boundaries the MSC preserve lands created as part of the Rancho Encantada Precise Plan in order to provide consistent, centralized natural resource and recreation management and update the planning recommendations to the 1985 Master Plan for Mission Trails Regional Park based on the public's recreational desires, planning overlays, policies and regulations, and I'm just going to read a little statement about the technical amendments to the community plans.

I already stated which community plans they are and these technical amendments are to insure that policy recommendations with regards to the management of Mission Trails Regional Park are consistent with updated policies in the master plan. It's a very important part of the process so that when subsequent projects come in staff can review those projects for consistency and they have consistency throughout all of our planning documents. Pursuant to General Plan Land Use Element Policy LUD.6, technical amendment may be processed to update or correct maps in community plan language needed as part of this project.

Also as part of the EIR process we're going to be developing, going to be analyzing alternatives. We covered two alternatives in the NOP and I just wanted make a statement to the public here that those are not the only two alternatives. As we go through the process it's very possible that we could develop additional alternatives to the project that would be analyzed and then you know you could comment on those as part of public review as well.

So that closes my part of the presentation. I'm going to go ahead and turn it over to the consultant team and they're going to go ahead and provide you a PowerPoint and then I'll take it when they're done.

Mark Carpenter: Thanks Myra. Can everyone hear me okay without the mic? Alright I keep the mic. Hopefully I don't start a coughing fit. I've been getting over a little bit of a cold. I'm Mark Carpenter. I'm a senior planner at KTU+A. We're the prime consultant. We've been pulling together the master plan update and working with a sub-consultant team. Recon environmental has been the lead on the National Resource Management Plan. So between myself and Recon tonight we'll give you a brief presentation of both those documents.

From an overview standpoint just make sure everyone's familiar with where we're at, we're here at the Visitor's Center. The original boundaries of the park is the Fortuna Mountain, Mission Gorge area, Cowles Mountain and Lake Murray. This master plan update is bringing in two additional areas into the planning purview of the park from an overall management perspective, that's the East Elliot expansion area here just to the north of SR-52 and then as described up off of the top of Miramar against Gooden Ranch there is the West Sycamore expansion area. So those are two additional areas being brought under the umbrella of the management of Mission Trails Regional Park.

We're going to go from south to north and just briefly describe kind of what the purpose of the master plan update is and the types of recommendations that are contained within it. Within the Lake Murray area the main recommendations moving forward are some additional facility improvements that were included in the original general development plan for the community park, mainly more passive recreation on the points inside the road as well as then some trail improvement, some trail closures around there to be able to clean up some of the user created trails that have been generated over the years and be able to create some more intact habitat in some areas. The other focus is really more on water quality improvement. Making sure as water that is diverted around the reservoir and discharged into Alvarado Creek there is an opportunity to be as clean as possible it makes its way out to the San Diego River and the Bay beyond.

Within Cowles Mountain there are some user created trails that have been created over the years that are the black dotted lines here. We are looking at closing those trails and doing passive restoration on those trails. We are looking at analyzing some of the trails that have some existing erosional issues or other elements and seeing if we can't do some improvements there to make those trails more sustainable, and then we do have recommendations for some new trails there that would create some larger loops instead of the up and back that is currently the typical destination up to the Cowles Mountain and back down depending on which trailhead you came from.

This is one of the areas that we've considered looking at some additional parking. So there are recommendations to consider parking at the Barker Way trailhead providing some additional off street parking in that area. Then, over here we've looked at a small parking area there off the Mission Gorge Road just north of Golfcrest as well as some additional staging area improvements and parking there off of Mesa Road. So those are some of the more major facilities there and improvements that have been considered.

Within the Mission Gorge area, the park, that's where the visitor center itself is included. One of the more significant improvements being considered would be an additional parking lot similar to what's outside the visitor center on the other side of Father Juniper Serra Trail. During peak use hours parking can be quite the challenge around here to find, so one consideration is can we look at creating some more. In addition to that, this is one of the areas of the park that will include the San Diego River Trail. That's part of the adopted San Diego River Park Master Plan for the City of San Diego. So it's looking at creating that from the south boundary of the park along the river through the Deerfield Bike Skills area, connecting through the visitor's center out to Father Juniper Serra Trail and then connecting across over the towards the East Fortuna Staging Area. We have additional trail improvements looking at the Kwaay Paay Trail. If any of you have used it you know it's very steep and has some eroded areas, so we're trying to improve that for sustainability and then we do have a couple additional trail loop recommendations to make some additional connections that way as well.

The Fortuna Mountain area is the largest area of the park being considered. It has most of the recreational trails and other facilities within the park. So from that standpoint there are a lot of recommendations regarding making trail improvements to improve the erosion and other sustainability issues associated with those trail facilities. There are a number of new trails recommended to create some additional loops and opportunities for connections up and over Fortuna Saddle to be able to connect the grasslands area, the east and west sides of Fortuna to actually provide better connection for park users. There are a few, you're going to see a few dotted black lines on there. There are a few user created trails within this area of the park. Not nearly as many as in some other areas. We are looking at trying to restore those areas and use that as ways of being able to create some additional trails elsewhere, some tradeoffs of closing some trails and building others elsewhere.

The East Elliot area of the park is one of the new expansion areas of the park. This area has been identified as part of the MSCP program as additional future preserve area. So it's been being acquired for conservation purposes. We are looking at trying to build some trail system, a trail network within that area of the park. You'll see quite a few black dotted lines in this area. Since

this area has not been formally being planned or designed, any of the trails that out there today are not formally approved trails. They're all unauthorized trails. So our challenge is trying to make sure are those trails in the best locations possible that we could look at permitting them and making them formal or are there better locations for creating a trail system there within that area of the park. So this is one of those challenging areas that there's some preexisting use that's not been planned or managed in the past. So that's one of the things we're trying to move forward with at this point.

There is along the eastern edge we have identified a future staging area that would come out of the approved Castle Rock development. There is a neighborhood park that we would be able to create then as a trailhead into that area of the park as well and there is consideration for is there a need for another more regional park entrance and staging area that may be consider in the future as well.

Lastly moving up to the west Sycamore area there to the north of MCS Miramar and adjacent to Goodan Ranch, that area had an approved trails plan that was done as part of this acquisition process. It is also considered conserved land for the purposes of the MSCP program, so additional trails in there have to work through the mitigation requirement associated with that preserve. We are trying to recommend a few additional trails to create some loops within that area, but you'll see there's a lot fewer recommendations within that area since it was already an approved process that it went through.

That's all I have for the master plan portion. I'm going to hand it over to Recon Environmental to talk a little bit about the Natural Resource Management Plan.

Mike Nieto: Thanks Mark. Hi I'm Mike Nieto with Recon Environmental. We've been working with KTU+A and the City to help develop an NRMP in association with the Master Plan update. Briefly, I'm going to stay brief because I know you all are here to comment, so I'm going to give a high level kind of Fisher Price version of the NRMP. At first I'm going to introduce the NRMP and we're going to talk about some of the resources within Mission Trails and then I'm going to highlight some elements of the NRMP. The document is publically available, so if you want more detail feel free to download it and we can talk later.

The Natural Resource Management Plan it's a requirement. It's a priority one directive in the MSCP and here's just a quote from the subarea plan. As you may or may not know the majority of the lands within this area are within the MHPA which is the Multi Habitat Planning Area.

The purpose of the NRMP was to first look at all the species and habitats that are within Mission Trails and not only look to see if they're sensitive but identify specific threats to those species within the preserve. Once we establish that we've provided area specific management directives which I'll go into a little bit later for these covered species. Then finally we developed protocols for management success evaluation to see if what we are proposing is actually working or not in a statistically valid way. If you guys are here you know the land and you care about it in some way and this will probably be a review. You know Mission Trails has very diverse vegetation, diverse topography, we'll start with that. You know we have gorges, valleys, flat areas. We have perennial hydrology also known as the San Diego River which flows through the land and

provides a lot of habitat as well as sensitive resources. We also have a lot of diverse vegetation types which have adapted to the topography and the soils and everything, and also a long history of human habitation in the area. Just a beautiful place to live and we're not the first people to come to that conclusion.

So what that equals is a lot of sensitive resources in a small place. We have federal threatened and endangered species. That's T&E state fully protected also MSCP covered and these sensitive resources are mostly in the terms of plants, wildlife and cultural resources or archaeology, that sort of thing.

So at ASMD I mentioned that earlier, it's Area Specific Management Directive. Basically this is part of the MSCP that makes sure that we're not using a one size fits all approach that the management that we're recommending is specific to Mission Trails and to the threats at Mission Trails. Some things that work in Rancho Penasquitos may not work at Mission Trails. So we crafted all our ASMD's to be specific to the preserve.

Here's just a couple of highlights of the NRMP. It's been an iterative approach. Kind of you know we had a piece of marble and we've been chunking at it and chunking at it and chunking at it through various revisions with staff, IEMM from San Diego State, SDMMMP, very large white and grey literature review, and as well as some regional conservation groups.

In the NRMP we did some conceptual habitat modeling. On the right is a conceptual model. It's basically we identified threats to the species within the preserve which is the key because when we're identifying management we want to make sure that what we do works within the preserve and what we have jurisdiction over and on the left is the habitat model, and as I said if you want more info feel free to check out the NRMP.

There is also species prioritization and management guilds. You know there are a lot of sensitive species within Mission Trails and the city would quickly go broke if we managed every single one specifically. So what we did was we worked with City and regional conservation staff to identify species that have very high threats at the park and that are also regionally rare and then we also identified species that have similar threats to them. We call those management guilds. You know two species might, for example might both be in the same area and both have a problem with invasive species. So for example the management directive would be let's get rid of those invasive species and you're helping two species from one action. So basically getting the most bang for our buck, for your buck and the City's buck and that's it.

Myra Herman: Thank you. I need a minute to put my glasses back on. So now if there's anybody who wants to make any specific comments on the record now is the time. So we're going to have the mic available and you can speak into the mike because we have to put this on record and you'll have, every person will have three minutes each to speak.

Male: I just have a question. The maps that you had as your presentation, are they available.

Mark Carpenter: Yes those are online as part of the Master Plan.

Male: Okay thank you.

Adam Kimberly: So you need name and.

Myra Herman: Oh I'm sorry name, address and then your comment.

Adam Kimberly: Okay thank you. My name is Adam Kimberly. I'm the CEO, current CEO of Allied Climbers of San Diego and a founding member of the organization. My address is 7864 Camino Jonata, San Diego 92122. When this master plan that they originally started in 2008 the first draft came out Allied Climbers of San Diego saw it and we saw that it basically limited climbing anywhere in the park to only at the main crag you can see right at Mission Gorge here and we had a big problem with that. So we came to the Citizen's Advisory Committee and the Task Force and a lot of things changed. You guys started these public comment workshops and you brought in a lot of public input and you've made a tremendous amount of progress. You should be commended for that and I want to thank you for that.

I'm a park user as a trail runner, a hiker, a cyclist, climber and I represent thousands of climbers around Southern California that want to use this area to climb. Even though we've made a ton of progress we're really happy to see all these new proposed climbing areas that have climbing resources within the park. There's still a few sticking points for us and I want to point a couple of those out. Number one, the South Boundary Quarry area. It's been eliminated from the draft EIR I think because of bat species that was there. We would like to see that area included in the EIR as a proposed climbing area. It has easy access from your roads, service roads and we're fairly confident that the climbing there would not directly impact the bat species and we'd like to see that gone through a proper EIR to assess the true impact of the climbing, assess where the climbing resource is relative to the roosting habitat and see if it is compatible with MSCP.

The other area we have some concerns about are the Santee Boulders. It's included as a proposed climbing area, but that seems a little odd considering climbing's been going on there for 50 plus years. The first bouldering competition in Southern California was held at the Santee Boulders in 1973. The first guidebook came out in '78 or '79 and today the area sees thousands, maybe tens of thousands climber days there and to consider that a proposed climbing area vice an existing climbing area seems almost ridiculous. The land is currently private land. Those parcels there were the climbing area is. The land owners are well aware of the recreation that goes on there, the climbing, the hiking, the mountain biking and they've chosen not to close that area, not to restrict that access to the public. So that says something. You know that's a valuable piece of information about how the land owners are currently treating that land that the existing access is by default considered approved access there.

The last thing to mention is that climbers as an organization or as a community have been excellent stewards of the land there. We've taken great care of the Santee Boulders area. We've organized numerous trash cleanups and also graffiti removal days. We had an event hosted by Josh Higgins here last year I think it was, almost a year ago, where we removed probably hundreds of square feet of graffiti with almost 100 volunteers working out there for eight to ten hours, multiple pressure washers using a biodegradable graffiti remover all at our own expense. After that event we were commended by the City of Santee for the work that we did there. I just

want to present that as an example of how climbers treat the area, how climbers are good stewards of the area and that it is really a valuable planning resource to us and we do respect the area.

So we do recognize that the existing trails there that are shown as existing trails on the map, whereas the climbing is not shown as an existing climbing area, are poorly routed and have erosion issues and we want to be a part of helping you guys fix those issues. We want to be a part of the solution there. What we don't want to see is those parcels become a part of the park and then have those areas closed while we're trying to figure out what to do with them. We want to see that access be maintained and we want to see the area remain open to climbing. So thank you guys very much for your time and awesome progress on this. We like to see it.

Cheryl Martin: Hi my name is Cheryl Martin. I'm at 8260 Echo Dell Road just across the street, 92119, and I'm here as a neighbor and as a park user. My first comment is that I'm very pleased to hear that a new parking area is being considered at the visitor's center. I would also like to hope that consider allowing parking later into the evening. As a neighbor of this parking area I do observe park users parking actually on Echo Dell Road and walking across Mission Gorge Road congesting our area. I would also like to ask that you consider more enforcement on the main trail of Cowles Mountain. All of the recent repairs in that area are wonderful and it's frustrating to see hikers cross cutting them and degrading them. I'd also like to encourage that you consider prohibiting trail running on this trail and it's incompatible with the heavy use. Thank you.

Randal Powell: My name is Randal Powell and I'm trustee of the Beeler Creek Conservancy at the progress of the north end of the project. We've helped with some of the installation of the oak groves there on the property and there's some new trails coming through that area in which it's good to see and it's getting a lot of use, a lot of horse ranches up that way, but the problem now is that the horses are going all over the place where there used to be a trail for the deer and the coyote. So it would be nice if we could quickly move in and do some sort of work on the trail to prevent those from becoming more used by horses and I think that's about it.

Steve Goldfarb: Good staff I'm first of all I'm Steve Goldfarb, 3153 Belle Isle Drive, San Diego 92105. My question is for staff and I would like to ask how staff reconciles the allowance of the private owners in East Elliot to develop their property with the fact that the City has put very strict restrictions on development in East Elliot in particular in the 1997 Community Plan Revision the City labeled the multispecies habitat area as open space which is presumably not compatible with development and then later, years later, they determined that although the zoning still remains out there as one dwelling unit for 40,000 square feet, that's about one acre, that the city would only allow one dwelling unit per ownership parcel. That means that if an owner owns 25 acres and if any development at all was allowed it would be one dwelling unit on 25 acres. Thank you.

Van Collingsworth: I'm Van Collingsworth and I'm here on behalf of three organizations that are interested in quality EIR being produced and that's Preserve Wild Santee, Center for Biological Diversity, and California Chaparral Institute. We would like to see a lot of I guess effort put into identifying where the resources are, exactly what resources are there to be

managed, that way we can get area specific management directives that make sense for both people and wildlife. We think that you know the park is important for people in terms of recreation, but one of I guess the concerns that I have is we're looking at development as if it has unlimited potential and growth goes on infinitely and we don't have open space that is added infinitely. In fact it's been the contrary. There's a lot more pressure that's being put on the open spaces that we do have and so one of the things that I would like to see addressed is Mr. Goldfarb's question. I'm actually on the other side of the issue from Mr. Goldfarb. We would like to see a lot of effort put into expansion of the park in East Elliot. We would like to see the City coming up with resources to buy Mr. Goldfarb's parcel if he's a willing seller. It's obvious that there's a lot of work that's been done on the west side of the landfill in terms of acquiring habitat for expansion of the park but there's very little that's been done on the east side and we think that the east side needs to become a priority. The existing land use right now is nonsensical in terms of the mix of private and public parcels. So we think there needs to be resources that become available to buy out those willing sellers on the eastside of the landfill as well and that become a higher priority than it has been.

I think also the trail issue is certainly something that needs to be very important that's looked at from both the people's recreational perspective and wildlife perspective and so again I'd like to emphasize the importance of identifying where the resources are in very detailed maps, aerial photos and so forth so that there can be a trail system designed to make sense to both people and wildlife. I'll just leave it at that.

Dave Dilbay: Hi my name is Dave Dilbay and I'm at 840 Cofair Court in Solana Beach and I'm a private property owner out here in East Elliot. My grandfather bought property out there gosh over 50 years ago. Those of us that own this private property we bought it because we thought one day we could you know build a house there, but that just hasn't been the case. So I echo Van's comments here, one of the issues is that City is putting all their resources to purchasing land on the west side of the landfill and there's very good reason for that because eventually that will become probably another landfill once the current landfill reaches its capacity and that's probably not common knowledge, but I think that's why they put all the resources into buying those properties on that side. I work with Van and I think most of us private property owners you know I have folks that ride bikes on my property and I have no problem with that. I'm okay with that. I just at some point would like to be compensated for my property, and the way the MSCP is setup MHPA is setup so that private property owners like myself have the ability to make some money off the property. We would dedicate and give the City 75% of the property and they would allow us to develop the least sensitive 25% and that really hasn't happened because I've tried. Again I think that there's a way that private property owners out there can be compensated and can be, expand the open space, expand the park and keep it you know so that everybody's happy and using the park, but I kind of feel like the property owners are getting the shaft on the thing right now. We have been for many, many years. I'm an outdoorsman. I surf, I hike, I bike, I do all that stuff and I have no problem, like I said, with everybody enjoying the property. I just feel like at some point we need to be compensated and like I said my grandfather bought this property over 50 years ago and still absolutely nothing, nothing but it's sat there.

Jack Zarour: My name is Jack Zarour. I'm a property owner of parcel number 3660706500, PO Box 23877 San Diego, California 92193. This week for one third of the world's population is a

special week, it's called believing. This week we Christians throughout the world are waiting for celebrating Sunday, Easter Sunday, the resurrection of God in the flesh of Jesus Christ who came into the world so that we may have hope to be with him for eternity.

I've been, my father has owned this land since 1982 ... but the City offered him, he broke down as a willing seller in October of 2010 part of a package of 11 properties. At his age, 85 years old, I told the real estate agent I can't tell him until escrow opens and the agent said, he said it's a done deal, don't worry just tell him. Just one more signature. The City of San Diego took that property out and the last signature just before Christmas. So we had to break the news to him. He lost hope. From January he stopped eating and February 2013 he passed away. There's three things that I need to share. Number one, I mean this particular map applies to us the East Elliot expansion area, the trails that go through the property, all the literature says that they are unauthorized trails. However, the roads are impacted with non-native rocks that the city has put to maintain these roads and these rocks speak volumes. Though we may say that they are unauthorized, but there's a purpose to that. Perhaps prescriptive easements so that it can be an expansion area, but there needs to be proper compensation. Right now there is bloody hands for the City of San Diego for the way they've treated the property owners. My brother the Marine he was killed in 1993 serving his country December 21st. We erected a monument, plaque complete. The cross that you see on the land is a memorial we put on December 14th and we had a memorial service on the 20th anniversary and he was killed December 21, 1993. So there have been many who have visited the cross and broke, one person broke the wood cross that we did put up and we reacted and did the right thing, myself, my children, my neighbor's children we stood and we asked God to forgive the person who broke the cross. That's what Christians do. There has been an injustice done to the landowners and that needs to be corrected. In one of our visits on our property one biker had fallen off his bike and he was motionless for about five seconds. By the time I got there his friends helped him up. He was riding on our property. So we have a problem. What happens if that man never got up? What happens if a snake bites somebody and they don't get up? It was like, I was told before by Mark who was out with me, oh don't worry about it, you're not liable – how can that be. I've been dealing with the city for the last eight months Chris Zirkle and it's time to get some closure. I'm all for it, the expansion, all for it. My kids love bike riding I do too, okay, but justice has to take place. I posted a sign on the property now that you are on private property at your own risk with the permission of property owner and the City of San Diego because that's the way it is, and the asterisk says here permission of property owners granted in writing to those individuals who have signed a release of liability form who obtained sufficient liability insurance naming property owners additional insurance, and paid the day use fee, and obtained permission in writing saying the written request of the property owner, name and address, and no one is authorized to be granted entry on this property without having written permission from the owner, posted April 16, 2014. So from now on whoever wants to use it, they need to pay, and when the city establishes a park, they need to collect revenue to compensate for all the deceased property owners who never got the opportunity to build, but were lied to in the 1960's that they could build. Tierrasanta was built, Mira Mesa was built, Scripps Ranch was built, East Elliot and the City of San Diego built it. So do the right thing and that's all I'm asking you to do.

Phil Moses: Hi my name is Phil Moses I'm at 7071cester, 92120 right here next to the park. I have multiple issues and most of them concerning basically the selective enforcement of the

habitat. I heard about this parking lot that needs to be built, and that parking lot may need to be built, but in the 90's anybody who is aware, there was a thriving BMX scene basically where the parking lot is being proposed and the signs went up and the bulldozers came out and they were told we're going to get this land down in the quarry and basically that killed it. So how is it that today we're proposing a parking lot to be built on an area that has signs that says protected habitat or habitat restoration, keep out, but in the 90's that area, or in the 90's that area there was thriving recreation. We had to remove those users. Today parking lot built. Second thing is I heard and read as much of these documents as I can about closures and I would like to address or have addressed what is the process of these closures because the gentlemen who just spoke, the other gentlemen with land in East Elliott, if you have 6,000 acres of open park space why would people be running, cycling, hiking on private property unless that private property had trails that the park did not maintain or build in a manner that was built upon the private property. So my question is what is the process? If the process is to close trails and kick people out the only thing that's going to happen is more trails are going to be built elsewhere or people are going to trespass and the hiring of four additional rangers to enforce is not going to solve the problem. If you have thousands of users and six or seven rangers great you're going to take away some of those people, but what I believe that environmentally if we're trying to protect the area there needs to be an approach of how do we close without driving away, or how do we close while providing another opportunity for these users elsewhere. So build trails, open trails, then close trails. Thank you.

Mark Carpenter: Anyone else want to comment?

Chuck Malan: Hi my name is Chuck Malan at 5153 Ladorna Street here in San Diego and I'd like to go over the last commenter as far as I believe you should provide more alternatives prior to the closures because otherwise you are alienating users and you're limiting access. As for myself, mountain biking is one of the few things that I can do in these properties because I am limited by a limited injury, pardon me an injury that limits me and gives me a partial disability. So going back into these trail systems as far as hiking or some of the trail systems that are really suitable to mountain biking are really, they're not available to me unless I can use my bicycle. Well a lot of the closures that you're putting in are really some of the best riding trails here in the entire area and the alternatives that you're leaving open or listed as multiuse trails when in reality they're really fire roads that are steep and rocky and unsuitable for foot travel, horse travel or bicycles. So some of the best riding, some of the best single track trails, some of the best hiking trails are the ones that you're closing and the alternatives that you're listing on the maps are really very unsuitable. So I would like to see the addition of a much better network or at least a more extensive network made available prior to the closure of these trails so that the riders that are using these systems now have alternatives to go to. Otherwise you're taking an entire section of users, the riders, the equestrians, a lot of these hikers and you're making an area that's completely, that they're used to using making it unavailable to them and without allowing for long enough alternatives, suitable alternatives. Again these fire roads that you have on the top of these ridges they come down along for the SDG&E service poles and so forth they're not suitable for hiking, they're very, very rocky, they're not suitable for horses, they're not suitable for bicycling, yet on your maps you show them as alternatives to the trail closures and it's really unfair to the users. Thank you.

Lyle Hawking: Hello, my name is Lyle Hawking and I live at 4890 Renovo Way in San Diego 92124. We live right on the south boundary of the park. Initially other than the Villa Dominique view homes association. Initially we have as many as 200 people on a weekend getting access to the park right through our neighborhood. Well we have a buffer on the south side of the park that's private property so we've been vigorously defending not having a trail up through their, but yet there's a marker up there and I've crossed it off several times on the planning thing, so I don't know whether your maps are not detailed enough to tell if that trail is closed or not, but I just want to make sure that that isn't becoming a problem. Right now it's not a problem, but in the past we've have had significant usage up there.

Dustin Sharper: Hi, Dustin Sharper. I live at 4331 Avenue Gregory in Spring Valley, on the board of the San Diego Mountain Biking Association. Mission Trails is currently scarred by a spaghetti bowl of redundant fire and service roads to the point where I don't really call it Mission Trails Regional Park, it's basically Service Roads Regional Park. We've GPSed the entire park. There are nine miles of trails that are open to bikes, about nine or ten open to hikers and the other 30 plus miles are fire or service roads. Some of this we can't do anything about and I appreciate that the City has gone to great lengths to talk to SDG&E and think about some of the redundancy, but I think that we need to push further to look to where we can actually close down some of these service roads. If we can't close them I'd like to see you guys study a possibility of narrowing them to the extent possible. Why does a service road have to be 20 feet wide and why do they make it wider and wider every year. If you look at the service road that goes up the back of Cowles it got wider just this year. So what is a habitat we can actually net by taking a 20 foot service road and reducing it to eight feet? It's great that we actually went through as part of this process and counted out all the endangered plants. How many more endangered plants could be actually living in the park if we reduce the footprint of all these service roads, to a very narrow footprint. In contrast trails have a very narrow footprint if they're built well, sustainably a lot of contour lines they blend into the environment unlike the scars that we see in the park today. I'd like to see you study putting the rangers out there on bikes on narrow trails instead of in giant, I don't know what they are Ford 350s, 250s, something that these monstrosities that don't have any place in city parks.

In Japan where people use fire roads and service roads, the utility companies, they actually go out and use these neat little two wheel things because the Japanese people won't accept a service road that's 20 feet wide in something that's being called a park or a reserve. In closing I'd like to say I'm sort of concerned with the city acquiring areas in Mission Trails Regional Park and managing those out of the parks budget for Parks and Recreation when we can't even seem to build a perimeter trail because they're so environmentally sensitive thinking about West Sycamore. So I'd like some to be proposed with the city doing a loop there and it seems like it's just not possible because of MSCP restrictions. Well if that's the case fine, but why is the Park and Recreation budget being stretched thin to cover what's really not in there for recreation _if you can't even have a perimeter trail. Thank you.

Mark Carpenter: Any other comments?

Josh Higgins: Hi, my name is Josh Higgins and I'm the president of Allied Climbers of San Diego. My address is 8551 _____ Road San Diego, California 92126. I started climbing here

in San Diego in 1999. The San Diego County Climbing Guidebook in the area for Mission Gorge it was multiple areas for climbing, Kwaay Paay, the quarry that we'd like to see reopened, the main wall, and there are other areas that climbers have talked about. Since then we've seen a systematic closure of every single one of these climb areas except the main wall and what's called Middle Earth which is really an extension of the main wall to us. So we're really excited about the fact that Mission Trails is considering this proposal to reopen some of these areas and we would just like to make it really clear that we'd be happy to partner with the park in whatever it takes to look at funding. We can talk to national access groups and we might have funding and we might be able to get community grants for trail building and we just don't want it to get into a space where the climbing area is proposed, there's an environmental, there's a cost for the environmental impact report, there's a cost for putting in a trail and it just never happens. So we'd just like to throw it out there that we'd love to partner to facilitate this process for these areas that are proposed and just really like to reiterate that the Santee Boulders are a 50 year old historic area for climbing and they're used every single day of the year that it's not raining. They, yeah, I learned how to climb there, Adam learned how to climb there, it's a really valuable resource, probably one of the most used climbing resources used in the entire county. So we'd love to see that stay open and the worry is it will be evaluated for its trails or assessed and we just don't want it to be closed during that assessment.

We'd be very happy to be part of the dialogue, part of the process. It's something at we do in Joshua Tree. We go in and see which trails are valuable, which ones aren't and we go in and we plant trees and we block with rocks and things the trails that don't need to be there. We're more than happy to help with that mitigation of getting the environmental impact that climbers have and there is trail redundancy out there, but we can still have access to the rocks and still protect the environment. Some of the areas we're very happy to have closed. A lot of those bouldering down the river that's riparian protected habitat and we're environmentalists. We don't want to see that impact and so we're happy to see that area closes, but some of these other areas we'd love to see them either reopened or stay open, including the quarry area. I can't tell you how many areas I climb on a regular basis that have bats in the cracks. When you climb out on the rock face during the day it doesn't really bother the bats that much and they have their happy home in there and then they come out at night and it doesn't really seem to have that much impact. So yea I would love to see the quarry open and Santee stay. So that's it.

Mark Carpenter: Does anyone else want to comment?

Steven Houlihan: Thank you. My name is Steven Houlihan and my address is 9641 Barrel Road in Santee 92071 and I represent Save Mission Trails and so I could say everybody here has excellent points about Mission Trails Regional Park. We all love Mission Trails Regional Park. Mountain bikers, hikers, equestrians, everyone together, rock climbers, but there are a lot of very drastic things that are happening within the park especially about trail closures. Save Mission Trails is really interested in things that are beyond that, bigger like the Quail Brush Power Plant. It seemed like that wasn't a big deal, but that could go right in the middle of all these areas. So yeah we want to close all these trails where everyone loves going, but right in the middle of it, it was okay to put a power plant. So there's some inconsistencies there. With the expansion of the dump we're closing all of East Elliot trails to mountain bikers and everybody, but yet we're going to have a massive dump, it's going to be one of the largest dumps in the city and then it

seems highly likely that they would go ahead and move the dump right over Spring Canyon, because what will Spring Canyon look like when you're looking at a giant dump that's going to be 1,000 feet tall? In addition you've got another development adjacent to Mission Trails in the Castle Rock property. Castle Rock property built on the base of the dump in the area that has all the important trails and all the important animals, all the important stuff, but yet we've sliced and diced three, those are three examples of areas that have been sliced and diced out of East Elliott.

Property owners. I mean they love the area. They thought that that was going to be their dream and there potential that it's going to be a giant dump, a power plant, and then the area that they didn't happen to get they're going to go ahead and develop a bunch of houses on there. There's things that need to be looked into that are, look at the big picture as far as, especially East Elliott, it's probably the most controversial area. Definitely closures around Cowles Mountain. You know people live butted up to Cowles Mountain, right up to Lake Murray on each side, but the management on East Elliott is definitely key, although I would say there is definitely issues all around the park, but please reconsider putting stronger language against any type of industrial zoning. So maybe something works out for Steve and the property owners, but at least they're only putting a small house on a big lot. By putting a massive power plant on a small lot and then telling someone like this guy if you can't live there that's wrong, that's definitely wrong, and then tell them oh mountain bikers can't go there, we're going to have one of the largest dumps in the state, that's wrong. Why can't the mountain bikers go there and ride their bikes? Then to close off a whole section and just build houses and then say there's so many sensitive species. Sometimes there's some inconsistencies. So thank you very much for your time and, but thanks for doing the expansion too. We want it all, we love Mission Trails.

Ben Stone: I'm Ben Stone. I live at 7555 Linda Vista Road, 92111. I'm a regular mountain biker and I love Mission Trails. I was on the, I'm a member of the San Diego Mountain Biking Association. I'm on a survey group that rode pretty much everything in the greater Mission Trails area that we were allowed to survey the upcoming trails and we grinded up all of the wonderful fire roads we have to offer out there. Kirk was with us as well and also road with the gentlemen who did all the GPS surveys of all Mission Trails. I'd like to echo that it's unfortunate how much fire road is out there and I've reviewed really thoroughly everything that's on the proposed Master Plan and there's some great stuff there. We had a couple recommendations that were passed along as far as to make sure to get loops in the park to prevent future illegal trails being made because once you have a loop for all the trails users, the trails runners I run into in East Elliott, all the mountain bikers, the answer is these long loops. People don't want to ride in and out of the trail. People want to go on the loop around and explore the park and right now the only way to do that is to end up on 50%, 70% fire road that's on a 22% to sometimes upwards grade. If you ever ride up Cowles Mountain on a mountain bike that is an experience, that's 27% grade going up the side of that mountain. It is brutal and we're not far off from that.

Right now we're at really limited options if the rest of East Elliott, if we see any further closures out there it's going to be rough. We have four corners straight L on the west side of Clairemont Mesa. It's about, to give you an example it's about 12 minute down, trail called E-Ticket and you're looking at about, depending on your skill level 25 to 45 minutes up on fire road except for S curves which is kind of improved, but that's about 10 minutes of the ride maybe if you're lucky. The current trail system we have out there the answer is not, and I'd like to just echo this,

the answer is not close more trails while trails are not being built. You're going to push all these user groups together into the park into a really rough spot and we're going to be totally condensed with people who are just your average hiker, your average runner, horses, mountain bikes, you throw them all together in the current trails we have then we're going to have a lot of trouble. It's going to be difficult. I just want to echo keeping those trails in the kind of gray area they are, no further enforcement out there than we already have because as Dustin mentioned if you compare the amount of square footage you have in fire roads to the amount of square footage you have in these gray area or legal trails, I mean it's not comparable. The amount, the impact on the environment and the redundant fire roads are just, it's mind blowing sometimes. It's frustrating to us the way we see it. If you've ever ridden towards East Elliott under the 52 facing the east side of Fortuna Mountain you're going to come over a hill and you're going to look down at three fire roads and they all go to the same point and they almost clear the entire mountain, that hill side. That could be one fire road. I'm just throwing out examples here. I empathize with the landowners and I agree that's something that needs to be figured out to ensure the future of East Elliott, ensure the trail use out there, so thank you.

Mark Shultz: Hi, I'm Mark Shultz. I live at 7323 Rondel Court in San Diego, 92119. I've been living in San Diego since 1969 and hiking, devoted to rock climbing on the boulders like you guys. Pat and I hike at least twice a week in Mission Trails area and also mountain bike in the area along with try to get through past the Santee Lakes these days to Martha's Grove supposedly on trails they're going to now closed, either the fire road through the, I believe it's the Stowe Trail, supposedly they closed it, but I guess they aren't enforcing as much as they used to, but I like doing the west Sycamore area as well as the East Elliott area if we can do it and open the trails. Like Steve said a lot of this doesn't make a lot of sense if you're going to end up turning some of the areas into industrial areas or even having them proposed. So if you guys can make sure you write the CPUC, and a few of these other organizations and try to stop once and for all this Quail Brush Power Plant idea. We all fought real hard for a couple years there to do it and stop it and as soon as we did stop it they still had permission to come back a year or two later and try and re-get a permit. So with that trying to stop it because that's really what's going to destroy not just the ecosystem here but hundreds of thousands of tons of particulate matter related to gas, a natural gas fired power plant. It's already obsolete before they built it. We're getting much more solar in San Diego, wind. I was just out in Borrego Springs on Monday and SDG&E is putting up wind turbines in areas that hadn't seen on Ocatillo. So we don't need this power plant, big thing right there.

We all love the park, we'll do anything to help. You know close down some of the fire roads. I couldn't agree more with what everybody already said here. I think we're all on the same page. So somehow if we can all come together, not just to stop this power plant, but also to help Mission Trails. We've all stopped riding the trails we're not supposed to, when we see the signs especially, but we do need loops whether it's up a fire road, down some single track or double track that's kind of what we call the ideal trail. We want to be able to mountain climb, we want to be able to get to some easy access to be able to rock climb. The power plant that we're talking about be right there basically, would have ruined a 50 year old tradition, the Santee Boulders Climbing area. Hiking. The only thing I haven't done out there is horse back ride and swimming. Please do what you can to help save Mission Trails, do whatever you can, volunteer. You know

John's over there and Jay and everybody, so do what you can to help guys and sign a petition, it does work.

Frank Hass: My name is Frank Hass, 6837 Lane Way in San Diego, 92120, 12 year residence of San Carlos, Del Cerro, big park user. Much like the gentlemen before me other than swimming or ride horses. I've been on pretty much every trail. I wanted to thank the private landowners who are here, first of all, for allowing us to enjoy your land without being compensated. In other parts of the country I tend to see that's not the case and I appreciate that on an individual level certainly.

Relative to the plan, I know a ton of work went into it. I've seen it mature over the years and like this gentlemen, I think Adam said big thanks to the CAC, the Task Force, everyone who's been involved because it's been a long process. A lot of competing interests and I think we're making great progress. Clearly a lot of constituents in the audience who want to make it a better park and can mobilize people whether it's the votes or the shovels or the hours, the ideas to get behind it. First time experiencing the climbing side, I can't agree with these guys more. There's a lot, a lot of history, not only California but at the federal level access funds and nation organization they've done a lot of studies with raptors and condors and bats and kind of opening up areas of access that doesn't upset the key environmental aspect. Same thing on the mountain biking side. I think there's a lot of truth to the comments about let's open up the new trails, work together to get them open and then try to close the other ones so that we're not condensing all the users into these areas so to the extent possible I would suggest that.

Then also in the interest of time I'll keep it short, but I saw that the camp grounds seem to open again and I think that's wonderful. That's a gateway for a lot of people to get out and use the park, not just on a day basis from their car, but in an environment that allows them to hopefully turn into long term outdoors people and the future people that will be in these rooms with us helping protect and preserve the access to the park, so thank you.

Mark Carpenter: Any other comments?

Jasmine Duffy: Hi my name is Jasmine Duffy and I live at 6665 Mission George Road, San Diego, CA 92120. I just also wanted to reiterate that the Santee Boulders are a long established climbing area and I would like that to be considered that it is an existing resource. Also the quarry area for climbing should be considered a proposed resource as there's a lot of climbers that would really enjoy using that area. Also the parking lot that's proposed right across from the Mission, or from the visitors center, I would like it to be open at night and not closed off as there's a lot of people that would like to park there and use the park later at night or maybe extended hours as at some point it is light a lot later than the closing hours and a lot of people get off of work and would really like to hike later at night.

Also on the south Fortuna side, the Saddle, there's no way to get down into the grasslands besides the fire service roads which are extremely steep and I'm quite capable as a young, quite fit, person to get down them and it still hurts. It hurts my knees and my back and I have to go down very slowly. I think it's actually a safety thing, I think we should be having a trail, a real

trail going down not just these fire roads that are extremely wide with loose gravel on them. So thank you.

Mark Carpenter: Anyone else?

Jason Chilwalter: My name is Jason Chilwalter. I live at 4827 Sunrise Hill Drive, El Cajon, CA 92020. I'm a member of the San Diego Mountain Biking Association and I'm on the board of directors. I have an issue here. First I want to say thank you to everybody that's been working on this. It's been a couple long years and lot of effort has gone into this and we all appreciate everything that's gone into this.

One of the issues we have is that during 2008, 2009 when the public was asked to participate and there was some nice big maps set up and a lot of people were asked to draw in proposed routes, which we did, we did so without knowing where the sensitive habitats are. I understand that everything takes time, but after we drew in our proposed routes these maps were released to the public that the city has come back and said that they are working on a trails plan, but the fact of the matter is we have some very, very sensitive habitat in this park that needs to be protected. So if we draw in these lines on a piece of paper without knowing where this habitat is what it renders is it renders everything useless. This has gone backwards. So I would like the city to please address how this trail plan and how this EIR are going to work together. What I mean by that is drawing lines on a map without knowing where the sensitive habitat is basically kills these lines which basically kills any kind of trail plan, and the citizens of this county have been waiting and waiting and waiting. We all know the issues in East Elliott. We want to see these issues resolved. I mean people have stopped building there, but they're building somewhere else. This is a vicious cycle that's going to happen, a vicious cycle.

I would like the city to also look into how the trails plan is going to be implemented. We have a lot of people here that own properties. They're not being compensated. All the property's being bought in the different area and we all know why, but a trail plan that crosses private property, any segment, whether that segment is five foot long, is a dead trail, because the city has said they will not manage a trail that's not 100% on your property. So there again we're drawing lines on a piece of paper. We're being sold it's a trail plan, but the fact of the matter is it's not. We can set this up so that the general public, who's ignorant, and they're going to go look what's being done here. I'm not saying nothings being done, but what I am saying is what effectively is being done. I would like to see to actually answer back to us on how property is going to be purchased on a hierarchy level as it pertains to the actual trails. If you buy a lot here and a lot here and a lot here and the trail runs through these five lots we're done because the trail will never be built. So please we would like some answers, thanks.

Patty Moon: Hi, this just in. I'm Patty Moon, 7323 Rondel Court San Diego, CA 92119. So as Steve was saying the power plant people are rearing their ugly heads again and we need to go to the CEC website and say no. So in order to do that, write this down, go to, there are two Facebook pages, Preserve Wild Santee and/or Save Mission Trails and there will be a comment link where you can go and make your comment on say no to CEC, the California Energy Commission, about the power plant. They still want to put it over there adjacent to Mission Trails Park which would make everything moot. Everything we're talking about tonight would

be moot because there would be this horrible power plant. So please do due diligence and say not to CEC on the power plant, the Quail Brush power plant. Before April 23rd. Thank you, tell your friends.

Mark Carpenter: Are there any other new commenters?

Steve Goldfarb: Well I thought I could add a few comments that might actually add some perspective to this whole situation. The MSCP is actually a Federal Habitat Conservation Plan and U.S. Congress created the Habitat Conservation Plan legislation for the purpose of enabling and facilitating private owners development in areas where there were endangered species. It was a positive and an affirmative act by the Congress. The MSCP in San Diego, which was put together with the U.S. Fish and Wildlife Service of the California Department of Fish and Game, took that concept and altered it somewhat, but still with the same basic principles. The principle of the MSCP is that the private owners get to develop 25% of their property and they then deed over to the city 75% to conservation. So even though that's still, that's highly weighted towards conservation it's still enables the private owners to develop their property. The problem in East Elliott arose roughly in 1997 that's when the MSDP was formulated in San Diego. When people in the city decided they wanted all the property, so whereas the city if they followed the MSCP would have gotten 75% at no cost, the decision was made to put into place restrictions on the private property development and then the city could come along years later and offer to purchase the property from owners who were despairing of ever being able to develop their 25% of their property. On top of that, so the city and the granters of funds, the wildlife agencies, are actually spending tens of millions of dollars of buying all the property and they can't get all the property when they would have gotten 75% for no charge. That would have allowed, if they were thinking about it at the time, the owners could have clustered their development on 25% leaving a whole broad area of 75% which would have made great extensions of Mission Trails Regional Park. So that's my comment. Thank you.

Phil Moses: So I'm Phil again and that would be my request is that the city used that same format with the home owners, 75, 25. If we went in, as Gus had mentioned, I would like the city for the EIR CEQA to look into. If you close ten miles of fire road can you build two and a half miles of single traffic or new trail? So if you measure a trail it's 12 feet wide versus the distance, the total of that property of the total of the land recovered by closing some of these fire roads and service roads, 25% of that could be looked into. Use it as in the same manner as the mitigation land, the dump, they expanded I think 13 acres was open space acres and they handed over four to one, whatever, same deal with the trails. Close trails versus new trails of some sort.

Mark Carpenter: Any other comments?

Frank Landis: I'll just say a brief comment. My name is Frank Landis, 7085 Del La Novella #5 San Diego, CA 92129. I'm speaking for the California Native Plant Society. So we just put in a word for the plants. I do know that the Willowy Monardella it likes places that mountain bikers like. This is an issue because unfortunately you can't get it out of the way, it's rooted. One of the things that I would say is I've seen a lot, the trail closures and enforcements don't necessarily work because people don't understand why the trails are being closed. I think most people don't want to ride over the Willowy Monardella if they have a choice in the matter. I think most people

claim to be environmentalists there. So I just simply suggest yea I think some of the trails need to be closed because some mountain bikers are riding within 3 or 4 feet of Willowy Monardella and don't want to slip and there goes the plant, there's only about 50 plants out there, but I would strongly suggest that public outreach and public education be part of the mitigation and part of the process of protecting plants like the Willowy Monardella and the other plants. It's not good enough to put barriers saying don't go there. I think people are rebellious enough that's not going to work and you'll have to really work on explaining why some of these restrictions are in place and explain to some people sometimes you can't see the plant and that's why the trail needs to be closed. So I just put in a word for more public outreach and try to make a case to the public why these plants are important and need to be saved, thank you.

Mark Carpenter: Anyone else?

Myra Herman: I think that's my cue. One last opportunity if there's anybody who wants to comment on the record? Remember there are forms outside on the table if you don't want to speak now, or if you have spoken, but you still want to put in some additional comments, feel free to fill out one of those forms and mail it back into me. They will become part of the record. Staff will be looking at all of those comments over all along with what was recorded and as we formulate the environmental analysis.

So since there's nobody else that wants to speak, but me right now I'm going to go ahead and close the meeting and I have to do this formally. It is 7:30, that clock is wrong back there. This closes the Public Environmental Scoping Meeting for the Mission Trails Regional Park Master Plan Update and Natural Resources Management Plan Project. Your input will be transcribed, considered by city staff for use in the scope of the EIR and included as part of the official record for the document. Speakers and commenters will also be placed on the notification list for further environmental review actions related to this project. So please if you spoke, even if you put your address on the record please make sure that it's on the sign in sheet out front because sometimes it's hard to get the numbers and the letters and stuff on there. We want to make sure we have accurate information and email is fine as well. I would also like to remind everyone that this is just the start of the environmental review process and opportunities for public input are still forthcoming. You can still comment on that master plan via email to Jeff Harkness. He's here if you want to rattle him later and then once the EIR is out for public review they'll be that opportunity as well. There will be other opportunities to provide comments on the project such as during the public review of the draft EIR as well as any future public hearings that will be held for the project as we go through the process. I believe there's a Park and Rec Board and there may be a counsel committee as well. As long as you're on our list you'll get notification of that. So thank you very much for taking the time to participate in this process, we really do appreciate you coming out. It's very beneficial for us to hear all these comments and get this information feedback, it helps us through the CEQA process, and have a great evening. Thank you.

END OF MEETING



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT ENVIRONMENTAL ANALYSIS SECTION (EAS) PUBLIC SCOPING MEETING

MTRP/MPU/NRMP

PROJECT NO. 349988

DATE: APRIL 17, 2014

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

I would ask in enacting the final management / trail plan that the City to consider trail users. Specifically, I would ask that new trails in each area be built before existing trails are closed. If not, where does the city expect all the trail users to go when this (East Elliot) is the most heavily used network in the city. I would be concerned more unauthorized trails will be built elsewhere. Caltrans does not close a major road until a replacement is provided, or else traffic chaos would ensue. Please consider the same impact with trail users. Lastly, I ask the City to ensure re-routes of steep, unsustainable trail segments remains in the plan. Many trails in MTRP proper are too steep for many users. (20%+ grades)

Name

Evan Solberg

Signature

Address

6255 Camino Juana SD 92111



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Comments:

- Please Keep Preserve Wild Santee / Center for Biological Diversity / CA Chaparral Institute on distribution List.
- Need Detailed Maps of Resources
- Need Area Specific Management Directions for Resources
- Make the most of the Park for people and Wildlife
- Discuss & Support Park Expansion to Alleviate Edge Effects from New Development / Growing population in Need of open space Recreation

Name

Van Collingworth

Signature

[Handwritten Signature]

Address

9222 Lake Canyon Rd.



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Comments: I am pleased to hear that a new parking area is being considered in the Visitor Center area. Please also consider allowing parking later into the evening - many evening hikers park on Echo Dell Rd. and walk across Mission Gorge Road.

Please consider more enforcement on the main trail of Cowles Mtn. (off Golfcrest). I appreciate the recent repairs, but still observe cross-cutting off-trail. Please also consider prohibiting trail-running on this trail - it is incompatible with the heavy use on this narrow trail. Thank you for your efforts.

Name Cheryl Martin Signature [Signature]

Address 8260 Echo Dell Rd. San Diego 92119



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Comments: If any trail changes will bring equestrian trails into or closer to occupied or potential least Bell's vireo habitat the DEIR should identify the likelihood that doing so will increase the likelihood of parasitism by cowbirds. It should also identify mitigation measures such as moving the trail, manure management along the trail, cowbird trapping, etc.

Many areas of the park are degraded by people leaving trails. The additional trails and the more attractive loop trails will attract more use. This added visitation will probably result in more off trail activity. Please include effective measures to keep visitors on trails to mitigate the additional visitor activity and its damage to habitat value and erosion resistance.

Name

Jim Peugh, San Diego Audubon

Signature

James O. Peugh

Address

2776 Niagara St. San Diego, CA 92106

peugh@cox.net, 619-224-4591

Use back of sheet if additional space is necessary.



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Comments:

New Trails in West Sycamore Area associated with Becker Canyon are being used to take horses all over the place off trail. They are impacting habitat + creating erosion gullies down fiddelines. This will require immediate management to restrict access off trail and promote restoration of already impaired areas.

New Trail proposed up Becker Canyon is suggested on the steep slope BUT should be up higher on the shoulder.

Name

Signature

Address

14710 Becker Canyon Rd. Poway, CA 92064
Trustee, Becker Creek Conservancy 058 / 442-4635

Use back of sheet if additional space is necessary.



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Comments:

The South Boundary Quary should be included in proposed EIR for Rock Climbing

Santer Boulders are shown as "proposed" but should be shown as an existing climbing area due to historical ^{current} use and valid in an EIR

I also want the park (santer boulders) to remain open for climbing during restoration to allow climbing access

Name

Angela Draper

Signature

Angela Draper

Address

4271 Appleton St. San Diego CA 92117



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Comments:

should be
• SOUTH BOUNDARY LINE INCLUDED IN PROPOSED MAP FOR ROCK CLIMBING
• BOUNDARY LINE SHOULD BE SHOWN AS AN
• SOUTHERN PROPOSED, SHOULD BE EXISTING CLIMBING AREA
• FIRST APPEARING COMPETITION IN 1970'S
• EXISTING ACCESS IS CONSIDERED VALID BY CURRENT LANDOWNERS AND SHOULD
BE CONSIDERED
VALID IN
EIR.
• DON'T WANT PART OF PARK CLOSED DURING RESTORATION TO ALLOW
CLIMBING ACCESS

Name

ERIL SCHERER

Signature

Address

41291 APPLETON ST, SAN DIEGO, CA 92117



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Comments: Please incorporate language into the Master Plan that declares "Mission Trails Regional Park is opposed to the Quail Brush Project" or any other Industrial Zoning adjacent to MTRP

Name Stephen Houlihan **Signature** 
Address 8824 Annandale Way San Diego CA 92071

Use back of sheet if additional space is necessary.