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DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Susan Peerson
Chairperson
Planning Commission
City of San Diego
1222 First Ave
San Diego, CA 92123
planningcommission@sandiego.gov

Subject: Comments on the Mission Trails Regional Park Master Plan Update Spring Canyon to Boulders Area Trail Alignment, City of San Diego, California

Dear Ms. Peerson and Planning Commissioners:

The California Department of Fish and Wildlife (Department) has been actively coordinating with the City of San Diego (City) on the Mission Trails Regional Park Master Plan Update (MPU). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program. The City is participating in the Department's NCCP program through implementation of its Multiple Species Conservation Program Subarea Plan (SAP). Several letters detailing the Department comments and recommendations on the MPU and the accompanying draft Program Environmental Impact Report (PEIR) have been submitted to City to date. In our correspondence dated January 20, 2017, and in several discussions and emails, the Department has expressed concerns regarding the MPU's siting of proposed trail alignments in sensitive habitat areas, specifically within the southern portion of East Elliot east of the Spring Canyon area.

The proposed east-west trail alignment south of the Sycamore Landfill connecting Spring Canyon to the Santee Boulders area may have a significant impact to wildlife movement and bedding areas. Therefore, the Department does not consider this proposed trail alignment to be compatible with the City's SAP. The canyons along the proposed trail alignment support several "safe harbor zones" (see Wildlife Tracking Institute 2010) and travel routes for mammal species, including mule deer (*Odocoileus hemionus*), mountain lion (*Puma concolor*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), gray fox (*Urocyon cinereoargenteus*), and small mammal populations that serve as a prey base for foraging raptors, as detailed in the *City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project, Comprehensive Final Report* (Western Tracking Institute 2010) and the *Mission Trails Regional Park Proposed Castlerock Trail Wildlife Assessment Summary of Findings Feb/Mar 2018* (Martin 2018). Recreational use of this area is not presently authorized. Increased human encroachment proposed via the MPU may jeopardize this area's ability to serve as a small sanctuary for wildlife away from the high human use areas. Direct observations of wildlife use of this area were made by Department staff during a January 26, 2018 site visit with the City where

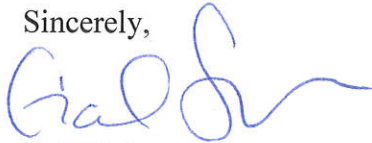
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several mule deer were flushed from their day bedding areas. Per the City's Framework Management Plan General Management Directives (SAP Section 1.5.2), recreational trails in the Multiple Habitat Planning Area should be located in the least sensitive area. For reasons detailed above, the proposed trail alignment conflicts with this directive. The Department believes that potentially less impactful alternative trail alignments may exist and has communicated these to the City.

In light of our concerns, we recommend that the proposed trail alignment be excluded from further consideration and removed from the MPU and final PEIR. The Department is currently coordinating with the City, the Sycamore Landfill, and other stakeholders to identify potential alternative alignments to better achieve consistency with the City's SAP, minimize potential impacts to wildlife, and accommodate stakeholder interests.

The Department values the ongoing partnership with the City and appreciates the continued cooperation on implementing the City's SAP and finalizing the Mission Trails Regional Park MPU. Should you have any questions regarding this letter, please contact me at 858-467-4212 or Gail.Sevrens@wildlife.ca.gov.

Sincerely,



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

Literature Cited:

Martin, B. (2018). Mission Trail Regional Park Proposed Castlerock Trail Wildlife Assessment Summary of Findings Feb/Mar 2018. 12 pp.

Western Tracking Institute. (2010). City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project. Final Report prepared for the City of San Diego Open Space Division Park and Recreation. May 2010. 48 pp.

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