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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. linoidea* 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 willowy 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

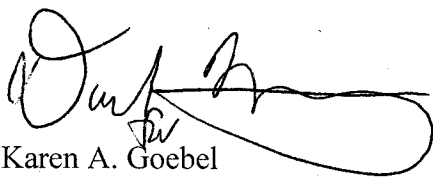
detrimental edge effects, including indirect effects from trail use.

- 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
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Sincerely,



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