

Cañada de San Vicente

Volume 2: *(Recirculated)*

DRAFT Initial Study/Mitigated Negative Declaration

[DRAFT Land Management Plan: see vol. 1]

September 2015



California Dept. of Fish & Wildlife
SOUTH COAST REGION
3883 Ruffin Road
San Diego, CA 92132

California State Parks
SOUTHERN SERVICE CENTER
2797 Truxtun Road
San Diego, CA 92106

This document represents the Draft Initial Study/Mitigated Negative Declaration recirculated for CEQA public review

Written comments or inquiries regarding this plan should be submitted to the address below:

California State Parks - Southern Service Center
Cañada de San Vicente Land Management Planning Team
2797 Truxtun Road
San Diego, CA 92106

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Cañada de San Vicente

Volume 2: *(Recirculated)*
**DRAFT Initial Study/
Mitigated Negative Declaration**

State Clearinghouse # 2015051017

Edmund G. Brown Jr.
Governor
State of California

John Laird
Secretary
California Natural Resources Agency

Charlton H. Bonham
Director
California Department of Fish and Wildlife



MITIGATED NEGATIVE DECLARATION

PROJECT: CAÑADA DE SAN VICENTE LAND MANAGEMENT PLAN

LEAD AGENCY: California Department of Fish and Wildlife

AVAILABILITY OF DOCUMENTS: The Initial Study for this Mitigated Negative Declaration is available for review at:

California Department of Fish and Wildlife
South Coast Region 5 Headquarters
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

San Diego County Library
Ramona Branch
1275 Main Street
Ramona, CA 92065

The Initial Study is attached. Questions or comments regarding this Initial Study/Mitigated Negative Declaration may be addressed to:

Environmental Coordinator
California Department of Parks & Recreation
Southern Service Center
2797 Truxtun Road, Barracks 26
San Diego, CA 92106
Environmental.Review@parks.ca.gov

Pursuant to Section 21082.1 of the California Environmental Quality Act, the California Department of Fish and Wildlife (CDFW) and the California Department of Parks and Recreation (CDPR) have independently reviewed and analyzed the Initial Study and Negative Declaration for the proposed project and find that these documents reflect the independent judgment of both agencies. CDFW, as lead agency, also confirms that the project mitigation measures detailed in these documents are feasible and will be implemented as stated in the Negative Declaration.

Richard O'Burg

September 08, 2015

Richard Burg
Supervisor, Lands/Wildlife Program South
California Department of Fish & Wildlife

Date

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CHAPTER 1

INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study (IS) and Mitigated Negative Declaration (MND) has been prepared by the California Department of Fish and Wildlife (CDFW) and California Department of Parks and Recreation (CDPR) to evaluate the potential environmental effects of the proposed Land Management Plan (LMP or the Plan) for the Cañada de San Vicente Ecological Reserve (the Reserve), San Diego County, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code §21000 *et seq.*, State CEQA Guidelines, California Code of Regulations (CCR) §15000 *et seq.*, and Fish and Game Code (FGC) §1019.

An IS is conducted by a lead agency to determine if a project may have a significant effect on the environment [CEQA Guidelines §15063(a)]. If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the lead agency determines that revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less-than-significant level, a MND may be prepared instead of an EIR [CEQA Guidelines §15070(b)]. The lead agency prepares a written statement describing the reasons a proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This IS conforms to the content requirements under CEQA Guidelines §15071.

1.2 LEAD AGENCY

The lead agency is the public agency with primary approval authority over the proposed project. In accordance with CEQA Guidelines §15051(b)(1), "the lead agency will normally be an agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." The lead agency for the proposed project is CDFW. The contact person for the lead agency is:

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California Department of Fish and Wildlife South Coast Region 5
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All inquiries regarding environmental compliance for this project, including comments on this environmental document should be addressed to:

California State Parks – Southern Service Center
2797 Truxtun Road
San Diego, CA 92106
Environmental.Review@parks.ca.gov

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of the proposed Plan on the Reserve. Resource avoidance, minimization and mitigation measures have been incorporated into the project to eliminate any potentially significant impacts or reduce them to a less-than-significant level.

This document is organized as follows:

- **Chapter 1 – Introduction**
The Plan begins with an introduction describing its purpose and organization.
- **Chapter 2 – Project Description**
This will describe the reasons for preparing the plan, the scope of the plan, and the plan's objectives.
- **Chapter 3 – Environmental Setting, Impacts, and Avoidance/Minimization/Mitigation (AMM) Measures**
This chapter identifies the significance of potential environmental impacts, explains the environmental setting for each environmental resource or impact, and evaluates each through the CEQA Environmental Checklist (IS). Avoidance, minimization and mitigation measures shall be incorporated, where appropriate, to eliminate or reduce any potentially significant impacts to a less-than-significant level.

1.4 SUMMARY OF FINDINGS

Chapter 3 of this document contains the IS that identifies potential significant environmental impacts (by environmental issue) which may result from implementation of the Plan. All potentially significant impacts of the Plan would be avoided or mitigated to a less than significant level by project revisions or other requirements imposed on the Plan.

Based on the IS and supporting environmental analysis provided in this document, the proposed Plan would result in less-than-significant impacts to the following resources or issues: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems.

In accordance with §15064(f) of the CEQA Guidelines, a MND shall be prepared if the proposed project would not have a significant effect on the environment after the inclusion of mitigation measures. Based on the available project information and the environmental analysis presented in this document, there is no substantial evidence that, after the incorporation of mitigation measures, the proposed project would have a significant effect on the environment. It is proposed that a MND be adopted in accordance with CEQA Guidelines.

CHAPTER 2

PROJECT DESCRIPTION

2.1 INTRODUCTION

This IS has been prepared by the CDFW and CDPR to evaluate the potential environmental effects of the Plan on the Reserve. The proposed project would establish goals and tasks for the development of specific management zones, activities and facilities within the Reserve.

2.2 PROJECT LOCATION

CAÑADA DE SAN VICENTE

This 5,014-acre Reserve is located in southern California's central San Diego County and is bordered by the Barona Indian Reservation to the south and east, the County of San Diego's Barnett Ranch Open Space to the north, and the significantly smaller Luelf Pond Open Space at its northwest corner. The town of Ramona lies to the north via San Vicente Road (Figure 1 – Appendix A). Private ownership adjacent to the Reserve includes the rural residential areas of Southern Oak Road near the northwest corner of the Reserve, and Mussey Grade and Kimball Valley to the west.

The only road into the Reserve is Chuck Wagon Road, which leads into the area from San Vicente Road in a southwesterly direction, roughly parallel to San Vicente Creek. The Reserve includes several distinct areas including San Vicente Creek, the Monte Vista Ranch compound, High Central Valley, Long's Gulch, the historic Daley Mine, and remnants of the Poole Ranch.

2.3 BACKGROUND AND NEED FOR THE PROJECT

The Reserve was acquired by CDFW to conserve, protect, and restore core habitat areas, and provide crucial wildlife linkages in the San Diego County Multiple Species Conservation Program Sub-Regional Plan (MSCP). Per a 2007 agreement between CDFW and the San Diego County Water Authority (SDCWA), an approximately 392-acre portion of Reserve (a.k.a. Rancho Cañada) was purchased by SDCWA and ultimately transferred in fee title to CDFW, December 21, 2007. These 392 acres provide mitigation for certain elements of SDCWA's Carryover Storage and San Vicente Dam Raise Project, with the balance of the property providing a contribution towards conservation for the Authority's Sub-Regional Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP). SDCWA provided CDFW with \$28,828.51 in start-up funds, \$419,689 in endowment funds, and \$14,987.71 of endowment interest for CDFW's management of the 392 acres per the terms of the 2007 agreement.

In June 2008, the CDFW acquired 4,056 acres from The Nature Conservancy for ≈\$15,921,000 via a U.S Fish and Wildlife Service Section 6 Grant (≈\$6,221,000) and State Coastal Conservancy Subgrant #04-131 (≈\$9,700,000) funds. The land was purchased for the protection of the natural resources including threatened and endangered species within San Vicente Reservoir Watershed.

In June 2010, the CDFW purchased 311 acres (Spitsbergen property) for

≈\$2,100,000.00 using a U.S. Fish and Wildlife Service Section 6 Grant. This acquisition protected undisturbed grasslands, chaparral, oak woodlands, and riparian habitat along the San Vicente Creek watershed. It also enhanced existing federal, State, and local NCCP efforts to secure key wildlife linkage and preserve core areas of habitat within the San Diego County Multiple Species Conservation Program Sub-Regional Plan (MSCP).

In September 2014, the CDFW acquired 256 acres (Bonfils) for ≈\$450,000 using a U.S. Fish and Wildlife Service Conservation Planning Land Acquisition Grant (≈\$292,500) and Habitat Conservation Fund (HCF) Proposition 117 (≈\$157,500) funds. This acquisition secured a key wildlife linkage, protected a core area of habitat and enhanced the existing MSCP in San Diego County.

In addition to the above purchases The Nature Conservancy provided funding for the operations and maintenance of the Reserve.

Together these three acquisitions were acquired to conserve, protect and restore core habitat areas and provide crucial wildlife linkages in the MSCP and the SDCWA NCCP/HCP. The area is habitat for a large number of species, all of which would benefit from a healthy, diverse, native environment that this Plan would help to foster (Refer to Appendices 8.3 (plants) and 8.5 (wildlife) of the Land Management Plan for sensitive species lists).

2.4 PROJECT OBJECTIVES

The purpose of the Plan is to serve as a descriptive inventory of fish, wildlife, plants, and habitat types which occur on the Reserve; provide a guide for appropriate uses of the Reserve; and provide an overview of and vision for the Reserve's operation, maintenance, and personnel requirements. The primary use of the Reserve will be as protected open space and wildlife habitat, with possible public uses to include limited hunting, education, and scientific research. Management will focus on maintaining viable populations of sensitive species and their habitats, and on the restoration and enhancement of natural communities within an ecosystem-based framework. Emphasis will be placed on the protection of riparian and wetland areas, restoration and enhancement of native grassland, and the control of noxious weeds.

2.5 PROJECT DESCRIPTION

For task planning and implementation purposes the Reserve has been divided into five distinct Management Zones: the Limited Hunting Zone, Backcountry Zone, San Vicente Arroyo Toad Habitat Zone, Education/Interpretive Zone, and Operational (Facilities) Zone (Figure 2 – Appendix A). These zones are described as follows:

Limited Hunting Zone – Designated area for hunting game, as well as adjacent areas used during the “off-seasons” for educational purposes

Backcountry Zone - Buffer area surrounding the core of the land, generally comprised of steep terrain

San Vicente Arroyo Toad Habitat Zone – Vegetated areas and waters associated with San Vicente Creek and adjoining uplands, which serve to support listed/sensitive

species, associated upland habitat, and provide a corridor for wildlife

Education/Interpretive Zone – Natural and cultural resource educational areas where organizations and school groups may be taken on guided hikes/tours

Operational Zone – Poole Ranch and Monte Vista Ranch; includes staff housing, office space, storage facilities, and other operational uses

For additional information on these zones, refer to the “Management Zones Matrix” table in the Land Management Plan.

The Management Program has been divided into four categories of elements: 1) Biological Elements; 2) Public Use Elements; 3) Facility Maintenance Elements; and 4) Cultural Resources Elements. For each element, CDFW has developed goals, objectives, and management and monitoring guidelines for avoiding and/or minimizing potential environmental impacts. These elements are described below. For more detailed information on each of these, refer to Chapter 4 of the Land Management Plan.

- Biological Element: consists of species, habitat, or communities.
- Public Use Element: consists of recreational, scientific, and other uses or activities appropriate to and compatible with the purpose for which the Reserve was acquired.
- Facility Maintenance Element: describes the general maintenance and administrative program which helps maintain orderly and beneficial management of the Reserve.
- Cultural Resources Element: consists of prehistoric and historic archaeological sites as well as architectural/historic resources (e.g., historic roads, mining resources, buildings, and ranching structures).

BIOLOGICAL ELEMENTS

Habitat Management is a high priority and includes the preservation, enhancement, and restoration of the terrestrial and aquatic habitats on the Reserve. Improving the quality of the habitat would ensure that the property continues to support healthy populations of native species and continues to function as an important wildlife corridor. Habitat Management includes three Biological Elements: 1) Riparian and Other Wetland Communities; 2) Oak Woodland; and 3) Chaparral, Scrub, and Grasslands.

Species Management includes thirteen (13) species, which are based on species’ listing designations and associated *Conditions of Coverage*, as outlined in the MSCP and SDCWA NCCP/HCP. The Plan’s species management list shall be updated when additional MSCP and/or NCCP/HCP covered species with conditions of coverage are detected in the Reserve.

San Diego thornmint	Burrowing owl
Delicate clarkia	Golden eagle
Lakeside ceanothus	Ferruginous hawk
Quino checkerspot butterfly	Northern harrier
Arroyo toad	California Rufous-crowned sparrow

Pallid bat
Townsend's big-eared bat

Mountain lion

The range of activities associated with the Biological Element includes:

- Conducting habitat assessments and regular surveys for special status plants/wildlife on the Reserve.
- Enhancing habitat quality and suitability for listed/sensitive species through control of nonnative plants and animals.
- Evaluating major disasters (e.g., fires, floods) occurring on the Reserve to determine extent of habitat degradation and impacts to species' population, and developing remedial measures to offset immediate and long-term disturbance.
- Minimizing or restricting maintenance activities and public access within occupied habitat during the breeding/nesting season to avoid impacts to listed/sensitive species.
- Coordinating with local and regional agencies/groups to ensure the preservation of special status species, sensitive vegetation communities, and biocorridors within the area.
- Maintaining and regularly update updating GIS database of listed/sensitive species' occurrences and suitable/occupied habitat.
- Providing opportunities for interpretation and research of biological resources on the Reserve.

PUBLIC USE ELEMENTS

The range of activities associated with the Public Use Element includes:

- Hunting
- Education/Interpretation (incl. special events; trails; signs/informational kiosks)
- Scientific research

Regulated public access for hunting is being proposed for the Reserve. This would include upland game bird hunting opportunities through the use of special draw hunts in conjunction with the Upland Gamebird Heritage Program, and possibly youth, mobility-impaired, and wounded veteran hunts. The hunting program includes plans to enhance water availability within the Reserve for both game and nongame species.

The existing barn may be utilized to support some aspects of the hunting program, such as hunter education. Educational and interpretive programming and scientific research that may benefit the understanding of the mission of CDFW and the various wildlife species and habitats at the Reserve shall also be encouraged.

FACILITY MAINTENANCE ELEMENTS

Existing facilities include structures remaining from the previous landowners that are currently being used by CDFW for operations/maintenance and staff residences. Historic remnants dating back to the ranching and mining periods are also spread across the Reserve (see Chapter 3, Section V – Cultural Resources).

Circulation through the Reserve is on unpaved maintenance and fire roads, with no designated trailheads or trails with exception to the Southern Oak Road trail connector. Lone vehicular access entry, which is in need of improvements, is located off Chuck Wagon Road in the northern section of the property.

The range of activities associated with the Facility Maintenance Element includes:

- Installation and maintenance of access controls
- Identification and management of cultural resources
- Road and trail maintenance
- Fencing
- Repair and maintenance of culverts/stream crossings
- Building maintenance
- Installation of signs/kiosks at Southern Oak Road trailheads
- Fire management

CULTURAL RESOURCES ELEMENTS

A primary goal of this element is to identify, document, evaluate, and protect cultural resources within the Reserve. Projects should be designed and implemented to avoid significant impacts to known, as well as potential cultural resources.

Potential activities involving cultural resources include:

- Maintaining a current, updated inventory, GIS mapping, and informational database for those historic resources within the Reserve that may be eligible for listing in the California Register of Historical Resources and/or the National Register of Historic Places.
- Recommending appropriate preservation treatments, managerial actions, and appropriate uses.
- Employing applicable professional standards to determine appropriate use (stabilization, restoration, reconstruction, or modification for adaptive reuse) for all historic resources to provide for their regular maintenance and long-term preservation.
- Providing cultural resource training to CDFW staff, and making locations of previously recorded cultural sites known to Reserve manager and game wardens so that they can monitor site conditions and watch for deterioration and/or vandalism.

- Developing measures to protect cultural resources during wildfire incidents, flash flood events, earthquakes, or other natural disasters, and procedures for assessing damages after a natural disaster event.
- Assessing the effects of visitor use and natural erosion on archaeological sites.

2.6 PROJECT IMPLEMENTATION

No projects are planned to be implemented immediately. Projects shall be funded through a variety of sources. As these funding sources become available, the highest priority needs for the Reserve would be assessed and plans made on how these needs shall be best met.

2.7 CONSISTENCY WITH LOCAL PLANS AND POLICIES

This Land Management Plan is consistent with local plans and policies, including the California Code of Regulations, Title 14; California Fish and Game Code; MSCP; and SDCWA NCCP/HCP.

California Environmental Quality Act (CEQA)

Established in 1970, CEQA is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or reduce the environmental effects by implementing feasible alternatives or mitigation measures. It is the state counterpart to the National Environmental Policy Act (NEPA) and is the fundamental regulation influencing the environmental effects of development within California.

Natural Community Conservation Planning Act (NCCPA)

Under the State's NCCP Act of 1991, and the, the County of San Diego developed the MSCP in 1997 which was created to work across political boundaries in a regional conservation effort aimed at preserving San Diego's diversity of native plants and animals, as well as protecting habitat, watersheds, and water quality.

The primary objective of the NCCP program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by species' listings by focusing on the long-term stability of wildlife and plant communities and including key interests in the process. The Reserve falls within the MSCP. Within the Subarea, the Reserve is part of the "Pre-Approved Mitigation Area" (PAMA) identified for long-term preservation for its inclusion of listed and sensitive species.

San Diego County General Plan

Chapter 5 (*Conservation and Open Space Element*) of the County's 2011 General Plan relates directly to the Reserve. Addressing nine resource types including biological, water, cultural, and visual resources, the Element is intended to help guide development while conserving natural resources, protecting open space, and providing park and recreation resources. Amongst its goals is a regionally coordinated preserve system that would be monitored and managed to facilitate "the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species."

SANDAG Regional Open Space Strategy

The San Diego Association of Governments' (SANDAG) Regional Open Space Strategy sets aside open space and protects the environment by ensuring that adequate quantities of diverse habitat types are maintained, and that the plants and animals found in these habitats are less likely to become endangered. Central to this is the creation and retention of open space corridors within and between communities.

Ramona Community Plan (2011)

Chapter 3 (*Conservation and Open Space*) of the 2011 Ramona Community Plan calls for, amongst other things, the conservation of “functional wildlife and plant habitats, particularly those supporting rare or endangered species.” Two of the Resource Conservation Areas (RCAs) identified in the plan are located within the Reserve: Irving Crest-Daney Canyon (RCA #51) and San Vicente Creek (RCA #52). Irving Crest-Daney Canyon is noted for its steep slopes, large rock outcrops, oak woodlands, and old-growth chaparral.

The San Vicente Creek area is noted for the existing oak and riparian woodlands along the drainage and its tributaries, which are considered significant resources that warrant conservation and protection.

Barnett Ranch Open Space Preserve

The Barnett Ranch Open Space Preserve (OSP), which lies to the immediate north of the Reserve, is owned and managed by the County of San Diego Department of Parks and Recreation (SDDPR) and shares similar vegetation communities, as well as plant and animal species. The adjacency of the two properties makes interagency coordination and collaboration important and relevant with regards to the larger MSCP context, as well as site-specific management goals including utilization of wildlife corridors, management of biological resources, and fire prevention and control.

2.8 DISCRETIONARY APPROVALS

Any resource agency permits required for development within the Reserve shall be coordinated with the agency with jurisdiction before a project enters its construction phase.

2.9 SIGNIFICANCE CRITERIA

The following criteria were considered in determining whether an impact (prior to minimization/conservation measures) on biological and water quality resources would be considered “significant” under CEQA.

- Long term degradation of a sensitive plant community because of substantial alteration of landform or site conditions;
- Substantial loss of a plant community and associated wildlife habitat;
- Fragmentation or isolation of wildlife habitats, especially riparian and wetland communities;
- Substantial effects to jurisdictional waters including wetlands requiring a 404, 401, or 1601 permit;
- Substantial disturbance of wildlife resulting from human activities;

- Avoidance by fish of biologically important habitat for substantial periods, which may increase mortality or reduce reproductive success;
- Permanent disruption of natural wildlife movement corridors;
- Substantial reduction in local population size attributable to direct mortality or habitat loss, lowered reproductive success, or habitat fragmentation of;
- Any take of species qualifying as rare and endangered under CEQA;
- Any take of species that are state-listed or federally listed as threatened or endangered;
- Results in the destruction or adverse modification of critical habitat as defined by USFWS;
- Substantial reduction or elimination of species diversity or abundance of any species of animal
- Conflict with any adopted habitat Conservation Plan, Natural Community Conservation Plan, or any other regional or state habitat conservation plan, local ordinance, or policy;
- Violation of any water quality standards or waste discharge requirements;
- Substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table;
- Substantial alteration of the existing drainage pattern of site or area in a manner which would result in substantial erosion or siltation on or off site;
- Substantial alteration of the existing drainage pattern of site or area in a manner which would result in substantial flooding on or off site;
- Creation of or contribution to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or otherwise substantially degrading water quality.

CHAPTER 3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

- | | |
|--|---|
| 1. Project Title: | Cañada de San Vicente Land Management Plan |
| 2. Lead Agency Name & Address: | California Department of Fish and Wildlife |
| 3. Contact Person & Phone Number: | Richard Burg, Project Manager, (858) 627-3939 |
| 4. Project Location: | Cañada de San Vicente Reserve, San Diego County |
| 5. Project Sponsor Name & Address: | California Department of Fish and Wildlife
Richard Burg, Project Manager
Supervisor Lands/Wildlife Program South
California Department of Fish and Wildlife
South Coast Region 5
3883 Ruffin Road
San Diego, CA 92123 |
| 6. Zoning/Classification: | State Ecological Reserve (pending) |
| 7. Description of Project: | Refer to Chapter 2, Section 5 |
| 8. Approval Required from Other
Public Agencies | none |

1. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | | |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project **COULD NOT** have a significant effect on the environment and a **NEGATIVE DECLARATION** will be prepared. ☐

I find that, although the original scope of the proposed project **COULD** have had a significant effect on the environment, there **WILL NOT** be a significant effect because revisions/mitigations to the project have been made by or agreed to by the applicant. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒

I find that the proposed project **MAY** have a significant effect on the environment and an **ENVIRONMENTAL IMPACT REPORT** or its functional equivalent will be prepared. ☐

I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment. However, at least one impact has been adequately analyzed in an earlier document, pursuant to applicable legal standards, and has been addressed by mitigation measures based on the earlier analysis, as described in the report's attachments. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the impacts not sufficiently addressed in previous documents. ☐

I find that, although the proposed project could have had a significant effect on the environment, because all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration, pursuant to applicable standards, and have been avoided or mitigated, pursuant to an earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, all impacts have been avoided or mitigated to a less-than-significant level and no further action is required. ☐

for
Theresa A. Stewart
Ed Pert
Regional Manager, South Coast Region
California Department of Fish & Wildlife

September 08, 2015

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers, except "No Impact", that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact does not apply to the project being evaluated (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on general or project-specific factors (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must consider the whole of the project-related effects, both direct and indirect, including off-site, cumulative, construction, and operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether that impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate when there is sufficient evidence that a substantial or potentially substantial adverse change may occur in any of the physical conditions within the area affected by the project that cannot be mitigated below a level of significance. If there are one or more "Potentially Significant Impact" entries, an Environmental Impact Report (EIR) is required.
4. A "Mitigated Negative Declaration" (Negative Declaration: Less Than Significant with Mitigation Incorporated) applies where the incorporation of mitigation measures, prior to declaration of project approval, has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact with Mitigation." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR (including a General Plan) or Negative Declaration [CCR, Guidelines for the Implementation of CEQA, § 15063(c)(3)(D)]. References to an earlier analysis should:
 - a) Identify the earlier analysis and state where it is available for review.
 - b) Indicate which effects from the environmental checklist were adequately analyzed in the earlier document, pursuant to applicable legal standards, and whether these effects were adequately addressed by mitigation measures included in that analysis.
 - c) Describe the mitigation measures in this document that were incorporated or refined from the earlier document and indicate to what extent they address site-specific conditions for this project.
6. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist or appendix (e.g., general plans, zoning ordinances, biological assessments). Reference to a previously prepared or outside document should include an indication of the page or pages where the statement is substantiated.
7. A source list should be appended to this document. Sources used or individuals contacted should be listed in the source list and cited in the discussion.
8. Explanation(s) of each issue should identify:
 - a) the criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question **and**
 - b) the mitigation measures, if any, prescribed to reduce the impact below the level of significance.

ENVIRONMENTAL ISSUES

I. AESTHETICS.

ENVIRONMENTAL SETTING

Aesthetic resources within the Reserve are many and varied, but include tree-lined San Vicente Creek, rugged hills and chaparral-clad slopes, scattered oak groves, the elevated grassland of the High Central Valley, and sweeping views from locations such as the former Daley Mine. Historic ranch roads, infrastructure such as water cisterns and corrals, and other elements including abandoned olive trees and trellising for grapevines offer glimpses into earlier agricultural uses of the property. Minimal development has left the Reserve with a feeling of tranquility and remoteness despite being a mere 35 miles from the nation's 8th largest city. Opportunities to see wildlife such as quail, turkey, and deer reinforce the area's role as a protected buffer and wildlife corridor.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Scenic vistas in the Reserve would be preserved and, in some areas, enhanced through the promotion of native plants and opportunities for wildlife viewing in protected habitat.
- b) The proposed management plan would not damage any scenic resources.
- c) By confining any potential development to the Operational Zone, the visual character of the Reserve would not be degraded. Siting the Reserve headquarters, staff housing, equipment storage, etc. together in an area that has already been disturbed would allow the remainder of the Reserve to be left in its current, largely undeveloped state.
- d) Exterior lighting on buildings within the Operational Zone would be minimal and would only be placed for safety purposes. This lighting should not affect day or nighttime views.

LMP Element	MITIGATION MEASURES – AESTHETIC RESOURCES (AR)	MONITORING REQUIREMENT	TIMING OF ACTION
Site maintenance	AR 1: Guidelines will be developed that outline materials & methods to be used for fencing & signs.	CDFW to develop guidelines.	Prior to site maintenance
Recreational monitoring & compliance	AR 2: Public use of the Reserve will be regulated & monitored, with only pedestrians & hunting dogs permitted in the Primary Hunting Zone. Vehicle use on roads will be limited to Department staff, emergency response, & pre-approved groups (e.g., for hunting, bird watching, biological surveys, special events, etc.).	CDFW to insure implementation & monitoring.	Continuous
Recreational access	AR 3: All trail use will be limited to pedestrians & (where applicable) equestrians – i.e., no motorized vehicles or mountain bikes.	CDFW to insure implementation & monitoring.	Continuous
Recreational access	AR 4: To help ensure potential impacts to resources are insignificant, the proposed through trail alignment that extends from Holly Oaks Park & Luelf Pond OSP to Southern Oak Road will be established within the footprint of the existing dirt road using the shortest & most direct route possible.	CDFW to evaluate & insure implementation.	Prior to trail construction
Recreational monitoring	AR 5: Continually evaluate recreation activities to identify & report changes that are warranted to maintain consistency with Reserve goals.	CDFW to evaluate on a regular basis.	Continuous

II. AGRICULTURAL AND FORESTRY RESOURCES.

ENVIRONMENTAL SETTING

Rancho Cañada de San Vicente's agricultural land use has historically been limited primarily to grazing beginning approximately in the 1840s, with indications of alfalfa production, limited orcharding (olives; dating to the early twentieth century) and an abandoned attempt at viticulture later in the twentieth century. From the 1880s into the early 1900s, honey was produced from apiaries with bees that pollinated the ranch's black sage and wild buckwheat.

While herds of cattle and horses typically grazed on the property, during the 1920s the "Goat Ranch" was home to a short-lived attempt to raise angora goats near the mouth of Daney Canyon. By the mid-twentieth century, the property was used as a vacation ranch for out-of-town owners with a hired foreman that ran cattle. Since that time, agricultural use of the land has gradually disappeared, with scattered ranch structures remaining as some of the only vestiges of this era.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT*:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest land?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model, prepared by the California Department of Conservation as an optional model for use in assessing impacts on agricultural and farmland.

DISCUSSION

- a) According to the State of California Department of Conservation's California Important Farmland Finder (CIFF) mapping application

(<http://maps.conservation.ca.gov/ciff/ciff.html>), the land along both sides of Chuck Wagon Road is classified varyingly as Grazing Land and “Farmland of Local Importance”. These two farmland types also characterize the land along the western boundary in the vicinity of Goat Ranch as well as the northwestern corner of the proposed. Portions of the High Central Valley area and Long’s Gulch are also classified as Farmland of Local Importance.

- b) The proposed Plan would not conflict with existing zoning for agricultural use.
- c) The proposed Plan would not result in the conversion of Farmland to non-agricultural use. The Reserve is currently zoned as a Specific Planning Area and is no longer used for agricultural purposes. The 2011 Ramona Community Plan identifies two Resource Conservation Areas (RCAs) within the Reserve, Irving Crest-Daney Canyon (RCA #51) and San Vicente Creek (RCA #52) as important to open space and natural resource conservation.
- d) The proposed Plan would not result in the loss of forest land or conversion of forest land to non-forest land.
- e) The proposed Plan would not result in the conversion of forest land to non-forest use.

III. AIR QUALITY

ENVIRONMENTAL SETTING

The Reserve is located within the San Diego County Air Pollution Control District (APCD), the local air quality management district. The District's plans include the San Diego Regional Air Quality Strategy (RAQS), addressing State requirements, and the San Diego portion of the California State Implementation Plan (SIP), addressing federal requirements.

The Southern California area as a whole is characterized by abundant sunshine, which drives the photochemical reactions which form pollutants such as ozone. Additionally, the summertime maximum mixing height (an index of how well pollutants can be dispersed vertically in the atmosphere) in the region averages the lowest in the U.S.

The most recently completed air quality plan prepared by the District is the 2011 Ambient Air Quality Network Plan. This plan provides detailed measurements of major criterion pollutants; the closest measuring stations to the Reserve are in the communities of El Cajon to the south, Alpine to the southeast, and Escondido to the northwest. Although the inland Alpine station measures the County's highest levels of pollutants, actions associated with the management of the Reserve would not affect the implementation of the Network Plan.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT*:				
a) Conflict with or obstruct implementation of the applicable air quality plan or regulation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations (e.g., children, the elderly, individuals with compromised respiratory or immune systems)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make these determinations.

DISCUSSION

- a) The proposed management plan for the Reserve would not obstruct implementation of the San Diego County Ambient Air Quality Network Plan. Because activities on the Reserve would be largely passive, with limited vehicular traffic, there will be very little introduction of pollutants from either development or use.
- b) The proposed plan would not violate any air quality standards maintained by the San Diego County Air Pollution Control District.
- c) There shall be no cumulatively considerable net increase of any criteria pollutant for which the San Diego County Air Pollution Control District is in non-attainment.
- d) The limited development within the Reserve would not expose visitors to substantial pollutant concentrations
- e) The proposed plan would not create objectionable odors (See Utilities & Services, Section XVI).

LMP Element	MITIGATION MEASURES – AIR QUALITY (AQ)	MONITORING REQUIREMENT	TIMING OF ACTION
Site maintenance Fugitive dust	AQ 1: Standard protocols for dust & drift control during maintenance activities such as periodic road grading & spraying for control of invasive vegetation shall be followed.	CDFW to insure implementation.	During site maintenance
Vehicle operations Exhaust emissions	AQ 2: Idling of vehicles shall be minimized to the maximum extent.	CDFW to insure implementation.	During site maintenance & public use activities
Vehicle operations Exhaust emissions Sensitive species	AQ 3: Speed limit on all dirt roads shall not exceed 15 MPH.	CDFW to insure implementation.	During site maintenance & public use activities

IV. BIOLOGICAL RESOURCES

ENVIRONMENTAL SETTING

HABITAT TYPES

Twenty-two (22) Vegetation Alliances/Groups¹ are known to occur within the Reserve:

Adenostoma fasciculatum
Adenostoma fasciculatum-*Xylococcus bicolor*
Artemisia californica-*Eriogonum fasciculatum*
Baccharis salicifolia
Bromus (diandrus, hordeaceus)-*Brachypodium distachyon*
Californian warm temperate marsh/seep
Ceanothus crassifolius
Ceanothus leucodermis
Ceanothus tomentosus
Corethrogyne filaginifolia
Eriogonum fasciculatum
Eriogonum fasciculatum-*Salvia apiana*
Lotus scoparius
Malosma laurina
Mediterranean California Naturalized Annual and Perennial Grassland
Platanus racemosa
Quercus agrifolia
Quercus berberidifolia
Quercus berberidifolia-*Adenostoma fasciculatum*
Quercus engelmannii
Salix lasiolepis
Salvia apiana

Adenostoma fasciculatum-Lotus scoparius Alliance (Chamise Chaparral)

Throughout its range, chamise (*Adenostoma fasciculatum*) is dominant in the shrub canopy and depending upon the location, may have ribbonwood (*A. sparsifolium*), eastwood manzanita (*Arctostaphylos glandulosa*), common manzanita (*A. manzanita*), whiteleaf manzanita (*A. viscida*), *Ceanothus* spp., sticky monkeyflower (*Diplacus aurantiacus*), California yerba santa (*Eriodictyon californicum*), California buckwheat (*Eriogonum fasciculatum*), chaparral yucca (*Hesperoyucca whipplei*), toyon (*Heteromeles arbutifolia*), California scrub oak (*Q. berberidifolia*), scrub live oak (*Q. wislizeni*), white sage (*Salvia apiana*), purple sage (*S. leucophylla*), black sage (*S. mellifera*), and poison-oak (*Toxicodendron diversilobum*). Emergent trees may be present at low cover. Shrubs are typically less than 13 feet tall; the canopy is intermittent to continuous, and the herbaceous layer is sparse to intermittent.

As a result of extensive high-frequency and high-intensity fires in Western San Diego County over the past few decades, this alliance is now poorly represented as mature stands. There is

¹ National Vegetation Classification System (NVCS, FGDC-STD-005-2008 [Version 2], Jennings et al. 2009) and Manual of California Vegetation (Sawyer et al. 2009)

evidence of type conversion to post-fire alliance stands of laurel sumac (*Malosma laurina*) and deerweed (*Lotus scoparius*), in addition to largely annual non-native grasslands.

Adenostoma fasciculatum-Xylococcus bicolor Alliance **(Chamise-Mission Manzanita Chaparral)**

In this alliance, chamise and mission manzanita (*Xylococcus bicolor*) are co-dominants in the shrub canopy and may co-occur with hoaryleaf ceanothus (*C. crassifolius*), Ramona lilac (*C. tomentosus*), wart-stem ceanothus (*C. verrucosus*), bush-rue (*Cneoridium dumosum*), chaparral yucca, toyon, Laurel sumac, California scrub oak, holly-leaf redberry (*Rhamnus ilicifolia*), sugar bush (*Rhus ovata*), white sage, and black sage. Shrubs are usually less than 10 feet tall; and the canopy is intermittent to continuous. The herbaceous layer is sparse to intermittent.

This chaparral, characterized by the mixture of chamise and mission manzanita, is endemic to the south coast of California and adjacent northern Baja California. Like chamise, manzanita is a resprouter following fires, but is typically representative of more mesic settings than where chamise is the sole dominant.

Artemisia californica-Eriogonum fasciculatum Alliance **(California Sagebrush-California Buckwheat Scrub)**

This alliance occurs from Northern Baja California to the Mount Diablo Range of central California. It is made up of two associations locally. One, the California sage (*Artemisia californica*) – California buckwheat – Laurel sumac is typical of drier coastal sage scrub slopes at lower and mid-elevations, usually away from the immediate coast. A second, the California sage – California buckwheat-coast prickly pear (*Opuntia littoralis*)/lady-fingers (*Dudleya edulis*) association has been recently defined from coastal San Diego County using data from this study and the Cabrillo National Monument project (Sproul, et al. 2011).

This alliance is often found in drier and more exposed settings either adjacent to California sage alliance stands or farther inland away from direct maritime fog influence. The alliance is characterized by California sage and California buckwheat as co-dominants in the shrub canopy and may include lower cover of chamise, sticky monkeyflower, California joint fir (*Ephedra californica*), interior goldenbush (*Ericameria linearifolia*), chaparral yucca, deerweed, Laurel sumac, lemonade berry (*Rhus integrifolia*), sugar bush, and/or white sage. Most shrubs are less than 7 feet in height. Some emergent large shrubs are up to 16 feet tall. The canopy can be one or two tiered, and ranges from intermittent to continuous cover. An herbaceous layer is present and dominated by spring annuals but may have some perennial grasses and geophytes.

Baccharis salicifolia Alliance (Mulefat Thickets)

Mulefat forms scraggly stands in both seasonally or intermittently flooded habitats, such as canyon bottoms, floodplains, irrigation ditches, lake margins, and stream channels. Stands are inherently variable depending on the amount of inundation and scouring. Stands usually form open shrublands or thickets in riparian corridors and along lake margins. The alliance is widespread throughout the warmer parts of California and the Southwest.

State-wide, mulefat (*Baccharis salicifolia*) is dominant or co-dominant in the shrub canopy with few to relatively numerous associated shrubs depending on location. These can include California sage, Emory's baccharis (*B. emoryi*), coyote brush (*B. pilularis*), tree tobacco

(*Nicotiana glauca*), laurel sumac, arrow weed (*Pluchea sericea*), blackberry species (*Rubus* spp.), sandbar willow (*Salix exigua*), arroyo willow (*S. lasiolepis*), blue elderberry (*Sambucus nigra*), and tamarisk species *Tamarix* spp. Emergent grey pine (*Pinus sabiniana*), California sycamore (*Platanus racemosa*), western cottonwood (*P. fremontii*), oak species (*Quercus* spp.), and willow species (*Salix* spp.) may be present in some stands. Shrubs are generally less than 16 feet tall, with the canopy open to continuous. The herbaceous layer is usually sparse.

Bromus (diandrus, hordeaceus)-Brachypodium distachyon Alliance **(Annual Brome Grasslands)**

In cismontane California, nonnative bromes (*Bromus* spp.) and other “false” bromes have become abundant and may strongly dominate in areas where the natural ecology of vegetation has been altered by high fire frequency, deposition, deep soil tilling, and/or intensive grazing. Many stands with ripgut brome (*Bromus diandrus*), soft chess (*B. hordeaceus*), or false brome (*Brachypodium distachyon*) are dominant or dominant with nonnatives in the herbaceous layer. Sometimes emergent trees and shrubs may be present at low cover. The herb layer is typically less than 30 inches in height and cover is intermittent to continuous.

Californian Warm Temperate Marsh/Seep Group

This is a group level classification of an herbaceous stand located in a wetland or seasonally moist to dry area, with soils moist through the growing season due to flooding or high water table. Generally consists of native obligate or facultative wetland perennial plants, including sedge species (*Carex* spp.), rush species (*Juncus* spp.), deer grass (*Muhlenbergia rigens*), monkeyflower species (*Mimulus* spp.), or other herbs. Stands are typically less than 5 feet tall.

Ceanothus crassifolius Alliance (Hoaryleaf Ceanothus Chaparral)

Hoaryleaf is an obligate seeder that produces a long-persisting seed bank. Monotypic stands of hoaryleaf occur in post-fire situations where the fire cycle ranges between 20 and 60 years, although individuals may live for over 90 years. Since stands are identified by strong dominance of hoaryleaf, most stands sampled in the area have likely experienced fire relatively recently. Fires occurring at short intervals have the potential to cause significant changes in species density and composition.

In general, the alliance is characterized by hoaryleaf as the dominant or co-dominant in the shrub canopy with chamise, big-berry manzanita (*A. glauca*), chaparral mountain mahogany (*Cercocarpus montanus*), chaparral whitethorn (*C. leucodermis*), sticky monkeyflower, California buckwheat, chaparral yucca, toyon, yellow bush-penstemon (*Keckiella antirrhinoides*), laurel sumac, California/inland scrub oak, sugar bush, and/or black sage. Emergent coast live oak (*Q. agrifolia*), and other trees may be present at low cover. Shrubs are usually less than 11 feet tall with the canopy intermittent to continuous. In mature stands the herbaceous layer is open.

Ceanothus leucodermis Alliance (Chaparral Whitethorn Chaparral)

Stands of chaparral whitethorn are found at elevations that are moderate to high for chaparral in early post-fire sites, and they appear longer-lived in coastal settings as compared to desert exposures. Shrubs experience moderate to high mortality in mature stands, especially those unburned for more than 40 years. Chaparral whitethorn rapidly sprouts from root crowns when branches are removed by fire (or other disturbance), but also seeds readily after fires. Stands

form at transitions between coastal scrub, chaparral, and conifer-oak forests.

In general, stands of this alliance are characterized by having chaparral whitethorn dominant in the shrub canopy with lesser cover of chamise, big-berry manzanita, deer brush (*C. integerrimus*), yerba santa species (*Eriodictyon* spp.), chaparral yucca, toyon, California scrub oak, skunk bush (*Rhus trilobata*), and/or poison oak. In some stands emergent canyon live oak (*Q. chrysolepis*), black oak (*Q. kelloggii*), or scrub live oak trees may be present at low cover. The shrub stratum is less than 13 feet in height, the canopy is intermittent to continuous, and the herbaceous layer is typically sparse.

Ceanothus tomentosus Alliance (Woolyleaf Ceanothus)

Woolyleaf (*C. tomentosus*) is dominant or co-dominant in the shrub canopy with chamise, ribbonwood, eastwood manzanita, big pod ceanothus (*C. megacarpus*), hairy-leaf ceanothus (*C. oliganthus*), toyon, California scrub oak, sugar bush, black sage, poison oak, and mission manzanita. Emergent coast live oak, canyon live oak, scrub live oak, and pepperwood (*Umbellularia californica*) trees may be present at low cover. Shrubs are generally less than 13 feet tall, the canopy is continuous to intermittent, and the herbaceous layer is sparse in mature stands.

Corethrogyne filaginifolia Provisional Alliance (Sand aster Patches)

Sand aster (*Corethrogyne filaginifolia* a.k.a. *Lessingia filaginifolia*) is a perennial herb characteristic of relatively dry settings on slopes throughout much of California. It is particularly common in the south coastal regions where it forms open stands with mixtures of native and nonnative herbs at the margins of post-fire recovering coastal scrub and chaparral stands, often adjacent to grasslands or other openings. Most stands are small and less than 2.5 acres in size.

Eriogonum fasciculatum Alliance (California Buckwheat Scrub)

California buckwheat is one of the most diagnostic species of the Californian Mediterranean drought deciduous scrub macrogroup. It dominates or co-dominates many thousands of acres from the San Francisco Bay region south to northern coastal Baja California. Stands do well on rocky sites and in shallow soils, and they establish after disturbance by fire or flood or after heavy grazing. In southern coastal California, this alliance is usually one of the first of the coastal scrubs to establish in mechanically disturbed areas, such as road cuts or slope failures, and it persists in areas with light to moderate grazing.

In general, stands of this alliance are characterized by California buckwheat as dominant or co-dominant in the shrub canopy in the cismontane stands with California sage, big sagebrush (*A. tridentata*), coyote bush, sticky monkeyflower, bush sunflower (*Encelia californica*), brittlebush (*E. farinose*), San Diego goldenbush (*Isocoma menziesii*), deer weed, coastal bushmallow (*Malacothamnus fasciculatus*), white sage, and black sage. In the transmontane stands with burro bush (*Ambrosia dumosa*), cheese bush (*A. salsola*), blackbush (*Coleogyne ramosissima*), mormon tea (*E. nevadensis*), green rabbitbrush (*Ericameria teretifolia*), creosote bush (*Larrea tridentata*), bladder sage (*Salazaria mexicana*), jojoba “goat nut” (*Simmondsia chinensis*), and desert sunflower (*Viguiera parishii*). Shrubs are typically less than 7 feet tall and the canopy is continuous or intermittent. The herbaceous layer is variable and it may be grassy.

Eriogonum fasciculatum-Salvia apiana Alliance **(California Buckwheat-White Sage Scrub)**

The California buckwheat-white sage alliance is limited to southern California and adjacent Baja California, Mexico. It differs from the previous California buckwheat alliance, by having white sage co-dominant. It typically occupies relatively well drained, coarse – textured soils inland from the coast to the desert margins of the eastern side of the Peninsular Ranges.

In general, stands of this alliance are characterized by California buckwheat and white sage as a co-dominant in the shrub canopy with California sage, chamise, desert ceanothus (*C. greggii*), chaparral whitethorn, snakeweed (*Gutierrezia sarothrae*), chaparral yucca, toyon, yellow bush-penstemon, deerweed, laurel sumac, and/or California/inland scrub oak sometimes present. Emergent coastal live oak trees may be present at low cover. Shrub canopy is usually less than 8 feet tall and is intermittent. The herbaceous layer is variable and may be grassy.

Lotus scoparius Alliance (Deerweed Scrub)

Deerweed is a short lived perennial shrub which typically colonizes slopes after fires in chaparral and coastal sage scrub throughout much of California. The alliance is an indicator of post-fire (or occasionally, other disturbance) conditions. Stands tend to persist for only a few years before other longer-lived woody species germinate or resprout, forming enough cover to convert to longer-persisting vegetation types.

In general, the characteristics of this alliance include: deerweed as the dominant or co-dominant in the shrub canopy with chamise, California sage, coyote bush, California joint fir, interior goldenbush, California yerba santa, California buckwheat, sawtooth goldenbush (*Hazardia squarrosa*), sand aster (*Lessingia filaginifolia*), chaparral bushmallow, desert apricot (*Prunus fremontii*), sugar bush, oak “golden” gooseberry (*Ribes quercetorum*), and white sage. Shrubs are usually less than 7 feet tall and the canopy is open to intermittent and often two tiered. The herbaceous layer may be sparse to intermittent.

Malosma laurina Alliance (Laurel Sumac Scrub)

Laurel sumac is a large evergreen, sclerophyllous shrub that occurs along the coast from Santa Barbara County south into northwestern Baja California. It is frost sensitive and its presence generally signifies the warm coastal regions of southern California. The shrub is a consummate resprouter, and can regularly resprout from its deep rootcrown multiple times in short succession following fires.

In general, the characteristics of the alliance as sampled so far include: Laurel sumac dominant or co-dominant in the shrub canopy with California sage, big-pod ceanothus, sticky monkeyflower, bush sunflower, coastal buckwheat (*E. cinereum*), California buckwheat, toyon, chaparral yucca, yellow bush-penstemon, holly-leaf redberry, lemonade berry, sugar bush, purple sage, black sage, parry tetraococcus (*Tetradloccus dioicus*), and/or poison oak. Emergent trees of such as coastal live oak or California sycamore may be present. Shrubs are usually less than 16 feet in height and the canopy is open to continuous. The herbaceous layer ranges from sparse to grassy. As a result of high frequency fires in the past few decades, this alliance has become more common in many areas of western San Diego County.

Mediterranean California Naturalized Annual and Perennial Grassland Group

The description is based on the group level (i.e., hierarchical level above the alliance) as classification to an alliance is not possible. Nonnative grasses and forbs are dominant over the native species, but none of the following nonnative species are clearly dominant or co-dominant: *Avena* spp., *Bromus* [ripgut, soft chess, red foxtail (*rubens*)], false brome, rye (*Lolium*) [rye grass (*perenne*), (*multiflorum*), (*temulentum*)], fountain grass (*Pennisetum* spp.), black mustard (*Brassica nigra*), poison hemlock (*Conium maculatum*), and/or crown daisy (*Glebionis coronaria*).

These species, though, may be present without dominance in a mixed assemblage that could include other naturalized, ruderal species, such as Agrostis Pacific bentgrass (*avenacea*), desertorum, creeping bentgrass (*stolonifera*), bentgrass (*viridis*), tall fescue (*Festuca arundinacea*), crab grass (*Digitaria* spp.), Russian thistle “tumbleweed” (*Salsola* spp.), filaree (*Erodium* spp.), Johnson grass (*Sorghum* spp.), thistle species (*Centaurea* spp.), Bermuda grass species (*Cynodon* spp.), *Schismus* spp., and milk thistle (*Silybum marianum*). This vegetation type is widespread and highly variable, and representative of general situations where ruderal plants have replaced natives through repeated soil disturbance and introduction of nonnative plants.

Platanus racemosa Alliance (California Sycamore Woodlands)

Sycamore stands are common along many of the streams. They may have mixtures of coast live oak and other trees, but are characterized by the presence of sycamores regularly spaced throughout the stands. In general the alliance is characterized by: California sycamore dominant or co-dominant in the tree canopy with white alder (*Alnus rhombifolia*), California black walnut (*Juglans californica*), western cottonwood, coast live oak, valley oak (*Q. lobata*), sandbar willow, black willow (*S. gooddingii*), red willow (*S. laevigata*), arroyo willow (*S. lasiolepis*), yellow willow (*S. lutea*), Peruvian pepper tree (*Schinus molle*), and pepperwood. Trees are the dominant layer and are generally less than 115 feet in height. The canopy is open to intermittent and the shrub layer is open to intermittent with the herbaceous layer ranging from sparse to grassy.

Quercus agrifolia Alliance (Coast Live Oak Woodland)

In general, characteristics of the alliance on a state-wide basis include: coast live oak dominant or co-dominant in the tree canopy with big-leaf maple (*Acer macrophyllum*), California box-elder (*A. negundo*), Pacific madrone (*Arbutus menziesii*), California black walnut, California sycamore, western cottonwood, blue oak (*Q. douglasii*), valley oak, Engelmann oak (*Q. engelmannii*), black oak, arroyo willow, and/or pepperwood. Trees are generally less than 98 feet tall and the canopy is open to continuous. The shrub layer is sparse to intermittent, and the herbaceous layer is sparse to grassy.

Quercus berberidifolia Alliance (Scrub Oak Chaparral)

Scrub oak is a general term representing multiple taxa of largely evergreen oaks that do not typically attain tree size in California. Taxonomic confusion abounds with many of these species. In the past decade most scrub oaks west of the desert margins have been called California scrub oak. However, hybridization between Engelmann oak and desert “muller” scrub oak (*Q. cornelius-mulleri*), normally found east of the Reserve, has led to progeny Torrey’s hybrid oak (*Q. x acutidens*) that ecologically and somewhat physiognomically resemble California scrub oak. In this report we treat all the stands of scrub oak –

characterized vegetation as members of the California scrub oak alliance, fully acknowledging the taxonomic issues at hand. In deference to this, we name the associations with regard to the likely regular presence of these Torrey's hybrid oak *Q. x acutidens* hybrids.

In general, stands of this alliance state-wide can be characterized by: California scrub oak dominant or co-dominant in the shrub canopy with chamise, ribbon wood, eastwood manzanita, big-berry manzanita, chaparral whitethorn, desert ceanothus, blueblossom (*C. thyrsiflorus*), California coffeeberry (*Frangula californica*), California ash (*Fraxinus dipetala*), toyon, chaparral pea (*Pickeringia montana*), holly-leaf cherry (*Prunus ilicifolia*), Scrub live oak, holly-leaf redberry, sugar bush, and/or poison oak. Emergent trees such as California buckeye (*Aesculus californica*), coast live oak, and grey pine may be present. The shrub layer is generally less than 20 feet tall and the canopy is intermittent or continuous (especially in mature stands). The herbaceous layer is generally sparse.

Quercus berberidifolia-Adenostoma fasciculatum Alliance **(Scrub Oak-Chamise Chaparral)**

This alliance is related to the California scrub oak alliance, but tends to occupy mid to upper slope positions where vegetation is transitional between xeric and mesic. It covers extensive areas of the lower montane and foothill belt of the Transverse and Peninsular Ranges in southern California.

In general, statewide, this alliance is characterized by California scrub oak and chamise co-dominant in the shrub canopy with manzanita species, hoaryleaf ceanothus, desert ceanothus, chaparral whitethorn, mountain mahogany, toyon, holly-leaf redberry, and/or mission manzanita. Emergent coast live oak, or Engelmann oak trees may be present. Typically shrubs are relatively tall in mature stands, but usually less than 20 feet in height and the canopy is open to continuous. The herbaceous layer is sparse under mature stands.

Quercus engelmannii Alliance (Engelmann Oak Woodland)

Engelmann oak is endemic to south coastal California and adjacent Baja California Norte. It is a sub-tropical oak that is partially drought deciduous. Engelmann oak occupies interior portions of the Reserve and only a few individuals and no stands are known less than 5 miles from the coast. Recent fires in San Diego County have had varied effects on Engelmann oak, including variable mortality in mature trees. Stands with grassy understories tend to suffer minimal damage, while trees in stands with shrubby understories are top-killed, but they may sprout and survive.

In general, stands diagnostic of the alliance have Engelmann oak dominant or co-dominant in the tree canopy with coast live oak, and black oak sometimes present. Trees are usually less than 59 feet tall and the canopy may be open to closed. The shrub layer is sparse to intermittent and the herbaceous layer is sparse or grassy.

Salix lasiolepis Alliance (Arroyo Willow Thickets)

Arroyo willow is an extremely variable species. It is probably the most abundant single riparian willow in California and comprises among the most extensive riparian scrub alliances in the state. Arroyo willow grows on seasonally or intermittently flooded sites. Some plants in southern California stands are sufficiently tall to be called trees. However, plants are typically shrubby and multi-branched.

In general, stands of this alliance in California have arroyo willow dominant or co-dominant in the shrub or tree canopy with big-leaf maple, coyote bush, mulefat, common button bush (*Cephalanthus occidentals*), Greek dogwood (*Cornus sericea*), California wax myrtle (*Morella californica*), California sycamore, black cottonwood (*Populus trichocarpa*), western cottonwood, willow species, and/or blue elderberry. As a shrubland, emergent trees may be present at low cover. Plants are generally less than 33 feet tall and the canopy is open to continuous. The herbaceous layer is variable.

Salvia apiana Alliance (White Sage Scrub)

Stands of white sage occur on coastal mountain slopes and benches, sometimes on alluvial fans, well inland in the Peninsular and Transverse ranges. The term “interior sage scrub” or “Riversidian sage scrub” has been used to categorize the vegetation commonly including this alliance. At semi-desert localities or extremely xeric, well-drained sites, stands shift to the California buckwheat alliance and may also be associated with the brittlebush alliance.

In general, stands of this alliance in California have the following characteristics: white sage is dominant or co-dominant in the shrub canopy with California sage, sticky monkeyflower, brittlebush, *Ericameria* spp., California buckwheat, chaparral yucca, San Diego goldenbush, coastal bushmallow, laurel sumac, and/or *Rhus* spp. Most shrubs are less than 7 feet, some less than 2 feet tall. The canopy is intermittent to continuous and often two tiered. The herbaceous layer is variable. Stands in western San Diego County are generally uncommon, occurring on the hottest exposures further inland.

WILDLIFE RESOURCES

Baseline inventories for arroyo toad, small mammals, and vegetation communities have been conducted over the past six years. Other inventories have been completed for invertebrates or fish species. Depending on available funding and/or CDFW expertise, surveys for species not yet inventoried would be initiated and continued as needed for those previously surveyed. All floristic surveys will follow protocol recommended by CDFW (CDFW 2000) and wildlife surveys will follow various USFWS/USGS recommended protocols.

LISTED/SENSITIVE SPECIES

Sensitive Wildlife Resources

The California Natural Diversity Database (CNDDB) Version 3.1.0 (CDFG 2003) was queried to compile a list of possible special status wildlife and fish species present within the Reserve. A total of 27 special status wildlife species, were identified as occurring in the San Vicente Reservoir and El Cajon Mountain 7.5-minute quadrangles (refer to Appendix 8.5 in the Land Management Plan for species accounts of all listed/sensitive wildlife). Two federally endangered species are found on the Reserve: the arroyo toad and the Quino checkerspot butterfly. Two CDFW fully-protected species are also found on the Reserve: the golden eagle and the white-tailed kite.

Sensitive Botanical Resources

A total of 31 special status plant species and two rare natural communities were identified as occurring in the San Vicente Reservoir and El Cajon Mountain USGS 7.5-minute quadrangles.

The San Diego thornmint (federally threatened, State endangered) has been recorded on the Reserve, along with the delicate clarkia and Lakeside ceanothus, both CNPS List 1B species. Known occurrences for any special status plant species were obtained from the CDFW CNDDDB Rarefind Database and from CDFW files and staff (refer to Appendix 8.3 in the Land Management Plan for species accounts of all listed/sensitive plants).

PROJECT IMPACTS

In planning and implementing the habitat and species portion of the Biological Element, CDFW would give priority to management activities that avoid direct impacts to protected resources, including native vegetation communities and the associated species they support. If direct impacts cannot be avoided, then site-specific plans would be prepared for management activities subject to CEQA review and must comply with all applicable regulations. Mitigation measures can be found in Chapter 5.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a sensitive, candidate, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The Plan is consistent with the specific conservation objectives of the MSCP, SDCWA NCCP/HCP and the California Fish and Game Code. It is possible that certain activities could potentially impact habitat that may be used by locally-occurring listed/sensitive species. Any such impacts are expected to be limited in size and scope, short-term in nature, and largely confined to areas that are already developed (e.g., Operational Zone) or less likely to support wildlife/plants of concern. Consequently, project-related activities are not expected to have a substantial adverse effect on any species. To the maximum extent feasible, project-related activities within habitat of a special status species shall be conducted outside the breeding season (March 1 – Sept 1) or other critical life phase of the wildlife/plant. Potentially significant impacts would be avoided by conducting vegetation surveys prior to initiation of any project. For any potential CEQA defined project, a CEQA analysis would be conducted prior to start of said project.
- b-c) Preservation of the riparian and aquatic/wetland habitat, as essential features of the Reserve's watershed ecosystem, has been identified as a key goal of the Plan's Biological Element. This shall be accomplished through reducing the cover and extent of invasive plants, and maintaining and enhancing riparian vegetation communities to help sustain populations of special-status species that rely on the habitat for foraging, breeding and roosting. Such activities would also benefit the non-listed game and non-game species that use these riparian/wetland areas. There are no proposed projects within any wetland riparian habitat other than the removal of non-native/invasive species and bi-annual presence/absence surveys for arroyo toad. These surveys will be conducted according to USGS protocol. These efforts would be mitigated for by conducting such activities in accordance with herbicide labelling and recommendations from CDFW personnel possessing a valid Qualified Applicator License/Qualified Applicator Certificate. In addition, no vegetation clearing or land disturbance within the stream channels shall be conducted without prior authorization from CDFW, U.S. Army Corps of Engineers, and Regional Water Quality Control Board, as appropriate.

- d) The Reserve functions as part of a regional biocorridor complex. The Science and Collaboration for Connected Wildlands (formerly the South Coast Wildlands), working with various federal, state, and local agencies has identified the San Diego Foothill Corridor (SC06) as a medium priority landscape linkage for numerous wildlife and plant species (Penrod et. al. 2001). Cañada de San Vicente is aligned within this linkage. The Reserve would effectively remain closed to the public (other than a minor hunting component and special events). As a consequence, activities associated with the Plan would not impede movement of any native or migratory species or impede use of native nursery sites.
- e) The preservation of approximately 9 acres of Engelmann oak woodland, found adjacent to San Vicente Creek and its tributaries, has been recognized as an important management goal. This habitat, which is limited in distribution throughout California and the County, supports a broad range of bird and mammal species, including game species such as deer, quail, and wild turkey. Accordingly, the Plan would focus on ensuring the persistence of Engelmann oak woodland on the Reserve, managing for species abundance and richness, and enhancing the habitat to benefit special status and game species. The proposed Plan, therefore, does not conflict with any local policies or ordinances protecting biological resources.
- f) The Plan is consistent with the provisions of the MSCP, SDCWA NCCP/HCP and the California Fish and Game Code. A total of 85 species are covered under the MSCP. Of these, five plant and 12 wildlife species known to occur within the Reserve. A total of 63 species are covered under the SDCWA NCCP/HCP. Of these, five plant and 12 wildlife species known to occur within the Reserve. Therefore, when developing goals and objectives for these species, CDFW has adhered to the Conditions of Coverage identified in the two Plans. Where appropriate, CDFW would implement the *Management Strategic Plan for Conserved Lands in Western San Diego County, Vol. 1* (Strategic Plan, *SDMMP 2013*) Strategic Plan MU 4 goals for species that occur on the Reserve.

LMP Element	MITIGATION MEASURES – BIOLOGICAL RESOURCES (BIO)	MONITORING REQUIREMENT	TIMING OF ACTION
Nesting birds	Bio 1: To avoid impacts to nesting birds, the clearing of vegetation & construction (when biologically warranted), shall occur outside of the peak avian breeding season, which generally extends from February 1 through September 1 (as early as January 1 for some raptors). If project construction is necessary during the breeding season, a qualified biologist shall conduct weekly surveys, starting within three days prior to start of construction to ensure no nesting birds in the area will be impacted by the project. If an active nest is identified, a buffer shall be established between activities & the nest so that birds are not disturbed. The buffer should maintain a minimum radius of 300 feet (500 feet for raptors), be delineated by temporary fencing, & remain in effect as long as construction is occurring or until the nest is no longer active. During construction, no activities shall take place within the fenced nest zone until the young have fledged, are no longer being fed by the parents, & shall not be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the species involved, ambient levels of construction-related noise, screening vegetation, or other possible factors.	CDFW to insure implementation, conduct surveys, & confirm.	Prior to, & during construction and/or maintenance
Native & sensitive vegetation	Bio 2: Conduct vegetation surveys prior to initiation of any CEQA defined project.	CDFW to insure implementation & confirm.	Prior to project
Native & sensitive vegetation	Bio 3: Inventory & map the invasive plant populations that pose a threat to sensitive/native vegetation communities on the Reserve.	CDFW to insure implementation & map.	
Native & sensitive vegetation	Bio 4: Conduct annual treatment & control of invasive/nonnative plants, targeting species (e.g., tamarisk, nonnative herbs & grasses) that are detrimental to habitats & species of concern.	CDFW to insure implementation & report to appropriate agencies.	Annually
Native & sensitive vegetation	Bio 5: Use BMPs to minimize the introduction & spread of non-native/invasive plant species. (BMPs for land managers in: http://www.cal-ipc.org/ip/prevention/landmanagers.php)	CDFW to insure implementation.	Continuous
Wildlife & sensitive species	Bio 6: Conduct a tracking study of wildlife use along San Vicente Creek to assess the functionality of the drainage as a biocorridor.	CDFW to insure implementation & prepare appropriate reporting.	
Sensitive species	Bio 7: Compile an inventory of the individual Engelmann oaks on the Reserve (i.e., locations, DBH, canopy, seedling/sapling counts, & health of individual trees) as part of the oak woodland assessment. Regularly monitor & control oak pests that could threaten the health of oak woodlands.	CDFW to insure implementation.	Continuous

Riparian disturbance	Bio 8: Every 5 years, or following a major disturbance event, identify & map areas within riparian/wetland habitat that are at high risk for degradation/conversion. Assess impacts to the habitat & any existing infrastructure, & provide recommendations for corrective action.	CDFW to insure implementation.	Every 5 years, or following a major disturbance event
Sensitive habitat	Bio 9: Establish permanent vegetation plots & photo stations within the four major habitat communities (i.e., oak woodland, riparian, shrub land, & grasslands) to document existing conditions, management practices, & vegetation changes over time. Institute monitoring procedures, & periodically evaluate & refine the protocol to improve habitat structure/function. Update CALVEG every 10 years or following any major disaster occurring on the Reserve.	CDFW to insure implementation & report to appropriate agencies.	Continuous
Sensitive species Sensitive land use	Bio 10: Coordinate with local entities, State & Federal agencies, universities, other reserve owners, & institutions on methods to develop & sustain biocorridors on a regional level. Work shall include efforts to acquire & preserve critical parcels of land, inventory & monitor the Reserve's natural resources, & public interpretation. A buffer system to minimize conflicts with nearby land uses, & protect native habitat at Cañada de San Vicente, will also be coordinated with appropriate groups.	CDFW to insure implementation & coordination.	Continuous
Rare & sensitive vegetation	Bio 11: Conduct rare plant surveys every 3 to 5 years, as funding & staffing levels allow, to document the presence/absence of sensitive plant species, including San Diego thornmint. Occurrences shall be recorded & updated after each field effort, & an evaluation of potential threats to survival/persistence will be completed for each rare plant.	CDFW to insure implementation & prepare appropriate reporting.	Every 3 to 5 years
Sensitive species	Bio 12: Conduct surveys for Quino checkerspot butterfly every 3 to 5 years as funding & staffing levels allow. Maintain & regularly update GIS information for the species. Enhance habitat in locations both suitable & previously occupied by the Quino checkerspot butterfly.	CDFW to insure implementation & prepare appropriate reporting.	Every 3 to 5 years
Sensitive species	Bio 13: At a minimum, conduct presence/absence surveys every 1 to 2 years & a habitat assessment for the arroyo toad every 5 years.	CDFW to insure implementation & prepare required reporting.	Survey every 1 to 2 years; habitat assessment every 5 years
Public education & training	Bio 14: Provide education or training to groups recreating on-site & install signage along San Vicente Creek during the arroyo toad breeding season to alert the public/staff of the area's sensitivity.	CDFW to ensure implementation. CDFW to create & review training materials, signage, &	Continuous

		documentation.	
Sensitive species	Bio 15: Control nonnative predators, enhance habitat, seasonally restrict access to arroyo toad breeding locations, & limit roadway use or implement reduced speeds during rainfall events within the San Vicente Arroyo Toad Habitat Zone & throughout the Reserve.	CDFW to insure implementation.	Continuous
Sensitive species	Bio 16: Conduct burrowing owls surveys every 2 to 3 years to establish the presence/absence of the species & habitat usage on the Reserve. Ensure persistence of suitable habitat through the maintenance or creation of natural & artificial burrows.	CDFW to insure implementation & prepare required reporting.	Every 2 to 3 years
Sensitive species	Bio 17: Coordinate and/or participate in local & regional raptor monitoring efforts for species, such as the northern harrier & golden eagle. Potentially limit public use or maintenance activities in areas occupied by the raptors (e.g., grasslands, rocky cliffs) or impose seasonal restrictions to prevent harm/harassment to the species.	CDFW to insure implementation.	Continuous
Sensitive species	Bio 18: Every 5 years, survey the roosting/breeding sites of the Townsend's big-eared bat, & conduct annual inspections & maintenance of the bat gates at the Daley Mine. Assess the status of the pallid bat (and other bat species) on the Reserve through periodic surveys of potential & known roosting/breeding locations every five years, & participation in MSCP radio-telemetry studies. Potentially limit public use or maintenance activities within proximity of known roosting/breeding sites or impose seasonal restrictions. Participate in MSCP bat monitoring efforts, as appropriate.	CDFW to insure implementation & prepare reporting requirements.	Survey roosting/breeding sites every 5 years; Annually inspect & maintain bat gates
Wildlife	Bio 19: Complete an inventory & population counts for game species on the Reserve & update, as needed. Enhance habitat for game & other wildlife species through the creation of brush piles, maintenance of water sources (e.g., guzzlers, wells).	CDFW to insure implementation.	Continuous
Invertebrate species Sensitive species	Bio 20: Conduct baseline Benthic Macro-Invertebrates (BMI) sampling along San Vicente Creek, & monitor species diversity & abundance over time to assess water quality within the drainage.	CDFW to insure implementation & prepare reporting requirements.	Continuous

Public education & training Sensitive species Sensitive cultural resources	Bio 21: Pre-hunting briefings shall be required to educate hunters regarding all Mitigation Measures required including: protection of cultural resources, protection of natural resources, & protection of species listed by CDFW & USFWS as threatened, endangered, or species of concern.	CDFW to ensure implementation. CDFW to create & review environmental training materials, documentation of environmental training.	Prior to hunt
Site maintenance Sensitive species	Bio 22: Repairs to roads, bridges, & culverts will be conducted within the existing footprint of the roads/structures, during normal daytime business hours. Prior to any road work (surface grading) within the Arroyo Toad Management Zone, roadways will be walked by a biologist to ensure no arroyo toads are present. Removal of vegetation overgrowth of the roads, bridges, & culverts will be conducted outside the bird nesting season (March 15-September 15) unless a qualified biologist completes pre-activity surveys to ensure no nesting birds will be impacted. All road gravel that is brought in from outside sources will be washed off-site to help prevent the spread of non-native invasive plants. If a significant impact will be likely, such as the potential take of a listed species, all work will be stopped until it is determined that conditions are safe to continue.	CDFW to insure implementation & conduct surveys.	Continuous
Site maintenance Wildlife movement Sensitive species	Bio 23: To facilitate wildlife movement: survey, evaluate, & remove unneeded internal fencing. No removal or installation of fencing/signage will occur during the bird nesting season (March 15 th - September 15 th unless a biologist conducts a pre activity survey within one week of scheduled work & determines there will be no impacts to nesting birds.	CDFW to insure implementation & conduct surveys.	Continuous
Wildlife	Bio 24: Evaluate & repair/enhance springs, guzzlers, & existing wells to enhance water availability for game & other wildlife species.	CDFW to insure implementation	Continuous
Research fieldwork	Bio 25: Facilitate & coordinate scientific research required to implement the LMP & focus environmental research on topics that will help CDFW achieve the goals & objectives outlined in the LMP, & thereby enhance adaptive management of the Reserve. Identify research projects that are consistent with LMP goals for environmental research on the Reserve & develop guidelines for submitting proposals for such work. Require submission of field data & final reports of all authorized research conducted on the Reserve.	CDFW to insure implementation & coordination	Continuous

Sensitive vegetation	<p>Bio 26: Non-native plants will be controlled where these species threaten to reduce the quality of habitat for wildlife or where non-natives pose a competitive threat to important native plant communities. Non-native plant species will be controlled using an integrated approach that relies on both non-chemical & chemical (i.e. herbicide) use strategies. The risk that herbicides pose to non-target organisms is dependent on both exposure & toxicity. This relationship between risk, exposure & toxicity can be assessed using the Hazard Quotient (HQ) method (http://www.fs.fed.us/foresthealth/pesticide/pdfs/PrepEnvirmentalDoc_11-2014.pdf). To reduce the risk posed to wildlife species at the Reserve, no herbicide will be used unless its calculated HQ value is below the Level Of Concern for the appropriate exposure scenario. Additionally, the risk to non-target wildlife & special-status plant species will be reduced by making low-volume, spot-treatments using hand-held equipment targeted specifically at non-native plants.</p>	CDFW to insure implementation & prepare appropriate reporting	Continuous
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V. CULTURAL RESOURCES.

ENVIRONMENTAL SETTING

Archaeological and Ethnographic Overview

The cultural story of this landscape starts long ago. The Kumeyaay believe that their ancestors were placed in this area by the creator and they have been here since time began. Scientific evidence, such as radiocarbon dating, indicates that people have been living in southern California for more than 9,000 years, with some evidence from the Channel Islands showing humans have been in this area for over 13,000 years. The resources of Cañada de San Vicente include plants and animals, rocks and minerals, shelters, and water sources that made this area ideal for habitation and procurement activities.

Cultural resources present on the Reserve include archaeological artifacts, features, and sites of both the Native American and historic periods, as well as traditional cultural places and resources, and historic buildings, structures, landscapes, and sites. These resources were researched, documented, and inventoried by California State Parks archaeologists and historians as part of a cultural resources inventory.

Historic Context

The majority of the Reserve is located within the former Monte Vista Ranch, which the California Department of Fish and Wildlife acquired between 2005 and 2008. The ranch was once part of the 13,316-acre Rancho Cañada de San Vicente y Mesa del Padre Barona ("The Glen of Saint Vincent and the Padre Barona Plateau") granted by Mexican Governor Pío Pico to Juan Bautista Lopez in 1846. Spanish padres and soldiers likely used a trail that followed San Vicente Creek while traveling between Mission San Diego de Alcalá and the mission's asistencia or sub-mission at Santa Ysabel as early as 1818. Beginning in the mid-nineteenth century, Don Juan Lopez (1846-1850) and then absentee owner Don Domingo Yorba (1850-1868) raised horses and cattle on the sprawling ranch.

After Yorba sold the ranch in 1868 it was cut up into separate holdings, including the 4,000-acre Barona Indian Reservation which borders the present-day Reserve to the east and south. While most of the owners after 1868 were San Francisco land speculators, a few became permanent settlers. For example, from 1881 to 1883, B. S. Sargent owned and operated a 200-acre ranch in Long's Gulch, where he raised cattle, horses, and grew alfalfa. Bees from his apiaries produced black sage and wild buckwheat honey.

Around 1885, owner Thomas J. Daley discovered a "blowout" of copper ore on the lee side of a rocky ridge overlooking a high central valley. The Daley or Barona Mine, which also produced traces of gold and silver ore, was in sporadic operation until 1930. During the early 1900s, James and Minnie Poole operated one of the largest honey-producing apiaries in the county in the property's northeast corner. While herds of cattle and horses were more common, during the 1920s the Goat Ranch was an abortive attempt made to raise angora goats at the mouth of Daney Canyon.

This cluster of rustic wood-frame ranch buildings now used as Fish & Wildlife staff residences are associated with the study area's namesake: the Monte Vista Ranch. In 1938 owners

Frederick and Ruth Williamson contracted local Ramona contractor Bruch Telford to improve the ranch's residential area. It is not known if the Williamsons were permanent residents, or used the property as a vacation/guest ranch until Frederick's death in 1945. The subsequent owner, the Buerkle family of Bakersfield, who employed a foreman to run cattle on the property, also used the ranch as a vacation property from 1949 to 1956. After which, absentee owners referred to the property as the Mirasol Ranch.

In 2007 the SDCWA funded the transfer of 392 acres to the CDFW to provide additional conservation acreage for its NCCP/HCP Preserve Area and mitigation for the San Vicente Dam Raise Project. In 2009 The Nature Conservancy (TNC) sold ownership of approximately 4,100 acres of the former ranch to the CDFW, and in 2010 CDFW acquired an additional 311-acre parcel west of Daney Canyon (from the adjacent Spitsbergen/Emerald Oaks parcel). In September 2014 CDFW acquired an additional 255 acres of property along the southwest boundary of the Reserve.

Archaeological Resources

Previous archaeological recordation work at the Reserve has been minimal. Only thirteen archaeological sites had been recorded within the area prior to the start of the current project and most of the previous work was done in the 1970s and 1990s when the property was being considered for development. The archaeological resources inventory conducted for the current Management Plan consisted of identification and documentation of known and suspected archaeological sites within the Reserve. California Department of Fish and Wildlife staff had observed certain areas that appeared to contain archaeological features and artifacts. These locations were shown to archaeologists from California State Parks and the team documented and recorded the sites, features, and artifacts that were present. Although only about 1.7 percent of the Reserve was examined as a result of this work, the count of known and recorded archaeological sites and isolates within the Reserve was raised to 53. However, much of the Reserve has not been examined, and very little of it has been systematically surveyed for archaeological resources, so it is anticipated that additional resources are present within the Reserve.

Of the 53 recorded cultural sites, 32 are Native American archaeological sites. These include rock shelters, stacked rock enclosures, rockwork foundations for large storage baskets, bedrock grinding features, resource procurement areas, stone tool manufacturing sites, camps, and habitation sites.

Historical Archaeological and Architectural Resources

In addition to the Native American sites, there are 16 sites containing at least one historic feature. These historic sites include mining, ranching, habitation, and water supply sites including building and structure foundations, fence lines, corrals, guzzlers, cisterns, tanks, historic vegetation, and other remnants of previous land uses of this property. The Operational Zone contains the rustic compound associated with the former Monte Vista Ranch and now used as Fish & Wildlife staff residences. This includes three small one-story dwellings, a mechanical equipment shed, an elevated water storage tank, and spring house. Other remnants of historic land use in the Reserve include stone and concrete cisterns associated with the area's ranching history.

Planning

It is important for planning and management purposes to know what archaeological and historic sites exist within the Reserve, where they exist, what condition they are in, and what threats they face. Threats to both the known and undocumented archaeological and historical sites include erosion, fire, project impacts, unauthorized trails and use, and vandalism including artifact collecting. Construction and/or maintenance of facilities, visitor-use activities, and habitat/fire management work also all have the potential to disturb, degrade, or damage surface and/or buried archaeological remains, historic structures, historic features, landscapes, or sacred sites.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
<u>WOULD THE PROJECT:</u>				
a) Cause a substantial adverse change in the significance of a historical resource, as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a-b) A variety of archeological, ethnographic, and historical resources are known to occur within the Reserve. While construction and maintenance of facilities, visitor use, and habitat and fire management work all have the potential to disturb surface and/or buried cultural remains, none of these activities is expected to have a significant impact to known or potential cultural resources.
- c) There is one known archaeological site on the Reserve where human remains were recovered, and a few other locations where there is a potential for them to occur. No activities proposed as part of the Plan are expected to disturb any human remains.

LMP Element	MITIGATION MEASURES – CULTURAL RESOURCES (CR)	MONITORING REQUIREMENT	TIMING OF ACTION
Historical resources	CR1: A current/updated inventory, GIS mapping, & informational database for cultural resources within the Reserve that may be eligible for listing in the California Register of Historical Resources and/or the National Register of Historic Places shall be maintained. All unlisted, eligible, or potentially eligible historical resources should be mapped, recorded, & evaluated to determine their eligibility status for placement on the National Register or California Register of Historic Places.	CDFW to ensure implementation. CSP to confirm.	Continuous

Cultural resources	CR2: Prior to any actions that have the potential to disturb the area of known or possible archeological sites, or in areas that have not been inspected for archaeological resources within the past 5 years, Environmental Review will be completed & additional research, archaeological survey, and/or testing will be carried out to determine if significant cultural resources exist.	CDFW to ensure implementation. CSP to confirm.	Prior to project
Archaeological research & fieldwork	CR3: Any fieldwork such as archaeological survey, testing, or other onsite research shall require pre-project environmental review & potentially permitting if work is being done by outside consultants or non-state entities.	CDFW to ensure review. CSP to confirm.	Prior to fieldwork
Cultural resources	CR4: Locations of previously recorded cultural sites shall be made known to CDFW staff (e.g., Reserve manager, game wardens) so that they can monitor site conditions & watch for deterioration and/or vandalism.	CDFW to ensure implementation. CSP to confirm.	Prior to site monitoring
Cultural resources	CR5: The effects of visitor use & natural erosion on known cultural resource sites shall be assessed.	CDFW to ensure implementation. CSP to confirm.	Continuous
Historical resources	CR6: Additional studies (e.g., archival research, detailed site & structure recordation, GIS mapping, subsurface testing, etc.) shall be conducted for any proposed project or undertaking that has the potential to disturb any known or potentially eligible historical resource.	CDFW to ensure implementation. CSP to confirm.	Prior to project
Cultural resources	CR7: Any new facilities including roads, trails, fence lines, structures, buildings, etc. shall be designed & constructed to avoid cultural resources to the extent possible. As per professional standards for assessing & mitigating significant impacts to historical resources, treatment measures in compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties will be implemented to reduce potential significant impacts to a level less than significant.	CDFW to ensure implementation. CSP to confirm.	Prior to, & during project
Cultural resources	CR8: If unexpected cultural remains are uncovered during any project activities, work will be stopped in that area so that the resource can be recorded, the nature of the deposit can be determined, & an appropriate avoidance, protection, or recovery plan can be implemented.	CDFW to ensure implementation. CSP to confirm.	During project
Cultural resources	CR9: Introduction of incompatible elements shall be avoided. Restoration & replacement of historic architectural features should be based on detailed & accurate representation of original features as substantiated by historical, physical, pictorial, or archaeological evidence.	CDFW to ensure implementation. CSP to confirm.	During project
	MITIGATION MEASURES – HUMAN REMAINS		

Human remains	<p>CR 10: In the event that human remains are discovered, work will cease immediately in the area of the find & the project manager will notify the appropriate CDFW personnel. The CDFW Reserve manager, regional manager, or authorized representative will notify the County Coroner/Medical Examiner in accordance with §7050.5 of the California Health & Safety Code. If the coroner/ME determines the remains represent Native American internment, the Native American Heritage Commission in Sacramento will be consulted to identify the most likely descendants & appropriate disposition of the remains. Work will not resume in the area of the find until proper disposition is complete. (PRC §5097.98).</p>	CDFW to ensure implementation. CSP to confirm.	During project
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VI. GEOLOGY AND SOILS.

ENVIRONMENTAL SETTING

The Reserve is located on the western slopes of the Peninsular Ranges. Topographic relief is diverse and in some cases extreme. The following information on geology and geomorphology was obtained from the Geology of Southern California (Decourten 2009). Reminiscent of the Sierra Nevada, the western slope of the Peninsular Ranges descends gradually through a foothills zone to the coastal plain of southern California. Rivers such as the San Luis Rey, Santa Margarita, and San Dieguito flow west through the foothills zone in scenic canyons similar to those in the Sierra Nevada foothills. In fact, the Peninsular Ranges and the Sierra Nevada appear to have more in common than just their overall physiography. The bedrock patterns of the two regions are also similar, suggesting some parallels in the geologic history.

The soils in the Peninsular Ranges are generally Lithic Xerorthents; Lithic, Pachic, and Calcic Haploxerolls; Typic Argixerolls; Typic Natrixeralfs; Natric Palexeralfs; and Chromoxerets and Pelloxererts. (Miles and Goudy 1997). The soils are well drained with carbonate accumulating in some (Miles and Goudy 1997). Soil temperature regimes are thermic and moisture regimes are primarily xeric (Miles and Goudy 1997).

Soils on the Reserve vary widely in depth, fertility, permeability, and other important characteristics. No listed hydric soils have been identified. The United States Department of Agriculture, Natural Resource Conservation Service has mapped the following nine soil series consisting of twenty-four (24) soil mapping units on the Reserve (USDA 1973):

- | | |
|---------------------|--------------|
| ▪ Cieneba | ▪ Riverwash |
| ▪ Cieneba Fallbrook | ▪ Visalia |
| ▪ Fallbrook | ▪ Vista |
| ▪ Olivenhain | ▪ Greenfield |

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area, or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable, as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The proposed Management Plan would not expose people or structures to potential substantial adverse effects including the risk of loss, injury or death due to earthquakes and other related geologic hazards. Review of the most recent Alquist-Priolo Earthquake Fault Zoning Map determined that the Reserve is not located within an Earthquake Fault Zone, thus minimizing the potential for adverse impact due to geologic activity.
- b) There are no planned activities that would result in substantial soil erosion or the loss of topsoil. Periodic road grading and its associated compaction should limit the potential for erosion impacting the Reserve's unpaved road network; moreover, use of these roads would be limited to CDFW staff and Emergency operations.
- c) Existing buildings on the Reserve are not located on a geologic unit or soil that is unstable, or that could become unstable as a result of the project and potentially result in either on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. No new structures are planned as a part of this Management Plan.
- d) Soil testing shall be completed during the design phase for any future proposed structures. Because this Management Plan does not propose construction of any new buildings, no testing shall be completed at this time.
- e) No increase in capacity of existing septic systems and/or construction of new systems is included as part of this Management Plan. Existing systems shall not be modified without appropriate soil testing to ensure soils would adequately support new or modified systems.
- f) No unique paleontological resources or unique geologic features shall be directly or indirectly destroyed. Geologic features shall be avoided by confining development within the existing previously-disturbed Operational Zone.

LMP Element	MITIGATION MEASURES – GEOLOGY & SOILS (GEO)	MONITORING REQUIREMENT	TIMING OF ACTION
Construction activities	Geo 1: The most recent revision of the California Building Code shall be implemented for all new & modified structures to mitigate the risk of loss, injury, or death due to geologic hazards.	CDFW to ensure implementation.	Prior to, & during project
Construction activities	Geo 2: Any paleontological resources that are unearthed as part of ground-disturbing activities would result in the suspension of work in order to evaluate & potentially recover the findings.	CDFW to ensure implementation. CSP to confirm.	During project
Construction activities	Geo 3: To the maximum extent feasible, any new facilities shall be designed & constructed to conform with the landscape's natural contours, so as to minimize overall topographic change.	CDFW to ensure implementation.	Prior to, & during project

VII. GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL SETTING

Greenhouse Gas (GHG) emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (i.e. HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions, accounting for 46% of the total regional emissions. Electricity production and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which converted the greenhouse gas emissions reduction goal for the State of California into law. The law mandates that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

According to the San Diego County Greenhouse Gas Inventory (2008), the region must reduce its GHG emissions by 33 percent from "business-as-usual" emissions to achieve 1990 emissions levels by the year 2020. "Business-as-usual" refers to the 2020 emissions that would have occurred in the absence of the mandated reductions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. Development of regional targets is underway and the San Diego Association of Governments (SANDAG) is in the process of preparing the region's Sustainable Communities Strategy (SCS) which would be a new element of the 2050 Regional Transportation Plan (RTP). The strategy would identify how regional greenhouse gas reduction targets, as established by the ARB, would be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. In addressing the potential for a project to generate GHG emissions that would have a potentially significant cumulative effect on the environment, a 900 metric ton threshold was selected to identify those

38 projects that would be required to calculate emissions and implement mitigation measures to reduce a potentially significant impact. The 900 metric ton screening threshold is based on a threshold included in the California Air Pollution Control Officers Association (CAPCOA) white paper that covers methods for addressing greenhouse gas emissions under CEQA. The CAPCOA white paper references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation. The 900 metric ton threshold was based on a review of data from four diverse cities (Los Angeles in southern California and Pleasanton, Dublin, and Livermore in northern California) to identify the threshold that would capture at least 90% of the residential units or office space on the pending applications list. This threshold would require a substantial portion of future development to minimize GHG emissions to ensure implementation of AB 32 targets are not impeded. By ensuring that projects that generate more than 900 metric tons of GHG implement mitigation measures to reduce emissions, it is expected that a majority of future development would contribute to emission reduction goals that would assist the region in meeting its GHG reduction targets.

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for O₃. San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The Project Area is contained within the San Diego Air Basin. This air basin has varying levels of attainment or non-attainment for criteria pollutants. One of the main determinants of the climatology of the San Diego County is the presence and location of a semi-permanent, high-pressure area (the Pacific High) in the eastern Pacific Ocean. In the summer, the Pacific High is located well to the north, causing storm tracks to be directed to the north and producing clear skies in San Diego County. However, during the winter, the Pacific High moves southward, and low-pressure storms are brought into the county, resulting in widespread precipitation. The heaviest precipitation occurs from November through April, averaging 6-15 inches along the coast to over 30 inches in the Laguna Mountains. The desert areas receive less than 9 inches per year. The average mean temperature is 62.2°F, and the maximum and minimum mean temperatures are 75.7°F and 48.5°F, respectively. The wind in the project area blows predominantly from the northwest most of the year with winds from the east confined to drier periods in late summer and fall. A major portion of the air pollution affecting the project area is wind-transported and likely arises from urban sources such as San Diego, Riverside, and the greater Los Angeles area. Tropical storm fronts occasionally enter the area from the south and east, carrying quantities of fine dust and silt. There is also air pollution generated inside

the project area. Vehicles operating on the highways, surface streets, and dirt roads of the county produce exhaust emissions and contribute to the air-borne particulate matter (dust and sand).

Air quality impacts from the proposed project operations are the result of emissions from motor vehicles and from short-term helicopter activities associated with the project. This study utilizes the San Diego County Land Use Environment Group (LUEG) established guidelines for determining significance which incorporate the Air Pollution Control District’s (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria are used as a numeric method to demonstrate that a project’s total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening level criteria for emissions of VOCs, the use of the screening level for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

The nature of this project does not involve any related construction and therefore would only generate operational emissions associated with vehicle trips. According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 average daily traffic (ADT) are below the screening-level criteria established by the LUEG guidelines for determining significance. As such, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the vehicle trips associated with the proposed project are not expected to significantly contribute to an existing or projected air quality violation. No other potential sources of air pollutants have been identified based on the projected activities in the project description.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The project is expected to generate less than 900 metric tons of GHG emissions based on estimates of GHG emissions for various project types included in the CAPCOA white paper. Emissions from the project would be generated from passenger vehicles and small trucks. The project’s GHG emissions are found to have a less than cumulatively considerable contribution to GHG emissions because the project would generate less than 900 metric tons of GHGs.

Furthermore, projects that generate less than 900 metric tons of GHG would also participate in emission reductions because air emissions including GHGs are under the purview of CARB (or other regulatory agencies) and would be “regulated” either by CARB,

the Federal Government, or other entities. As a result, even the emissions that result from projects that produce less than 900 metric tons of GHG would be subject to emission reductions. Likewise, the project would also participate in the mandated emissions reductions through energy and resource use that is subject to emission reduction mandates beyond “business-as-usual.”

Therefore, it is determined that the project would result in less than cumulatively considerable impacts associated with GHG emissions and no mitigation is required.

- b) Until state and local plans are developed to address greenhouse gas emissions, such as a local Sustainable Communities Strategy and updated General Plan Policies, the project is evaluated to determine whether it would impede the implementation of AB 32 GHG reduction targets. For the reasons discussed in the response to question VII.a), the project would not impede the implementation of AB 32 reduction targets. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

ENVIRONMENTAL SETTING

Hazardous waste may be present within construction materials used for CDFW structures. Appropriate testing, as necessary, of building materials that have potential to contain hazardous materials shall take place prior to construction/demolition to minimize risks to human health.

Management concerns include fire risk due to the prevalence of nonnative grasses in the woodland understory and the proximity of chaparral and scrub habitats with high fuel loads. Wildfires such as the 2003 Cedar Fire, which burned most of the Reserve, are fed by these high fuel loads and under dry, hot or windy conditions are a threat to existing development and human safety. Wildfire management is essential for human safety and to minimize catastrophic fire damage to vegetation, wildlife and other resources on the Reserve.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be located in the vicinity of a private airstrip? If so, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death from wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a-d) Implementation of the proposed Management Plan is not anticipated to involve the transport, use or disposal of any hazardous materials; accidental release of hazardous materials, substances or waste; emission or handling of hazardous waste within one-quarter mile of an existing or proposed school; or location on a site which is listed as a hazardous material site.
- e-f) The Reserve is not located within two miles of a public airport, public use airport or private airstrip.
- g) No emergency response plans or emergency evacuation plans shall be impaired by implementation of the Management Plan. Existing response plans would remain in place in the event of an emergency.
- h) Although a small increase in public visitation to the Reserve would occur as a result of the proposed Plan, its implementation shall not expose people or structures to a significant risk of loss, injury or death from wildland fires. Requirements of the California Building Code shall be implemented to reduce the risk of wildfire impact to visitors, staff, structures and resources. Additionally, general fire management procedures (e.g., roads/firebreaks) would be implemented on the Reserve to control and minimize the threat of wildfires.

LMP Element	MITIGATION MEASURES – HAZARDS/HAZARDOUS MATERIALS (HAZ)	MONITORING REQUIREMENT	TIMING OF ACTION
Hazardous substances	Haz 1: In the case that hazardous waste such as lead or asbestos are found within building materials that will be impacted during modification or demolition, appropriate measures will be taken to ensure their safe removal & compliance with appropriate laws & regulations.	CDFW to ensure implementation.	During project
Fire	Haz 2: Fire Management activities such as fuel modification shall be subject to site specific planning with CAL FIRE & conducted in accordance with CAL FIRE & CDFW regulations & policies.	CDFW to ensure implementation. CAL FIRE to confirm.	Prior to project

IX. HYDROLOGY AND WATER QUALITY.

ENVIRONMENTAL SETTING

The Reserve is located in a rural and incorporated portion of San Diego County in the California Floristic Province, Southwest Region, Peninsular Ranges Subregion (Hickman 1993). Elevations range from 880 to 1,910 feet above sea level. The climate is considered Mediterranean and fluctuates with seasons of hot dry summers and mild wet winters. Average annual rainfall is approximately 16 inches, which falls as rain primarily in the winter. Temperatures range from highs of 67°-100+° F and lows from 37°-57° F). The freeze-free period is from 275 - 350 days (Miles and Goudey 1997).

The Reserve comprises roughly 10% of the San Vicente watershed, which covers approximately 47,624 acres. Water sources range from ephemeral drainages and year-round springs along fault lines; seasonal seeps which flow only in high rainfall years; to deep rocky basins known as tenajas, which may hold water for a few weeks.

Approximately 13.3 miles of perennial and intermittent streams have been mapped within the Reserve as delineated on USGS topographic quadrangle sheets. There are no perennial drainages and few intermittent or ephemeral drainages, San Vicente Creek and Long's Gulch being the two largest of the latter. Springs and seeps are found throughout the Reserve and are often associated with geological formations such as faults. Springs are identified by a concentrated discharge of groundwater, appearing at the ground surface with a current of flowing water. Seeps, on the other hand, indicate a slow movement of groundwater to the surface (Todd 1980).

Riparian and other aquatic habitats found on the Reserve are associated primarily with San Vicente Creek and its tributaries. These habitats provide food, water, cover, and migration and dispersal corridors for an abundance of wildlife including the federally-listed endangered arroyo toad. Other special-status species that occur in these habitats include the western spadefoot, two-striped garter snake, yellow warbler, pallid bat, and western mastiff bat. Approximately half of the 104 avian species observed on the Reserve were detected in riparian vegetation. Game species found in these habitats include wild turkey and mourning dove.

A water transfer system dating to 1953 is operated by the city of San Diego Public Utilities Department and is located along the western edge of the Reserve. It is part of the larger system which conveys water from Lake Sutherland to the San Vicente Reservoir via the Sutherland-San Vicente Pipeline. Through the Reserve, the water follows an open channel through Daney Canyon before emptying into San Vicente Creek on its final leg to the reservoir.

There are three wells on the Reserve which serve the various facilities including residences.

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place structures that would impede or redirect flood flows within a 100-year flood hazard area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death from flooding, including flooding resulting from the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Result in inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Implementation of the proposed Plan would not violate any water quality standards or waste discharge requirements; no activities are proposed which would result in the discharge of water or wastewater.
- b) Activities associated with the Plan are not expected to deplete or interfere with groundwater recharge. Groundwater (wells) would be used to supply the existing ranch complex and fill wildlife watering devices. CDFW would evaluate and repair/enhance springs, guzzlers, and existing wells to enhance water availability for wildlife. Should

expanded or additional water supplies be required, an evaluation of potential impacts to groundwater supplies/recharge would be needed before construction of any new facilities.

- c-e) The Plan would not alter any of the existing drainage courses by grading, construction of new buildings or paved areas. The drainage pattern of onsite creeks would not be altered, and the project would not increase the rate or amount of surface runoff.
- f) Surface-disturbing activities such as periodic road grading could result in a minor increase in the availability and/or transport of sediments that could enter surface waters such as San Vicente Creek. Management activities on the Reserve, though, shall use appropriate BMPs to control excess erosion/sedimentation and prevent degradation of water quality.
- g) No housing units or other facilities would be constructed within a 100-year flood hazard area.
- h) The plan would not place structures that would impede or redirect flood flows within a 100-year flood hazard area.
- i) No levees or dams exist within the Reserve that could expose people or structures to loss, injury or death.
- j) No risk of seiche, tsunami or mudflow is likely within the Reserve. Large enough water bodies do not exist close enough for threat of either seiche or tsunami. Although erosion potential is possible, the threat of inundation by mudflow is minimal.

LMP Element	MITIGATION MEASURES – HYDROLOGY/WATER QUALITY (WQ)	MONITORING REQUIREMENT	TIMING OF ACTION
Erosion & sedimentation	WQ 1: BMPs to address erosion & excess sedimentation shall be incorporated into activities/operations that have the potential to cause discharges off-site. Weed-free products will be used to the extent possible to minimize the spread of exotics.	CDFW to ensure implementation.	During project
Site maintenance	WQ 2: BMPs employed during surface-disturbing activities shall comply with all applicable water quality standards.	CDFW to ensure implementation.	During project
Site maintenance Sensitive vegetation	WQ 3: No vegetation clearing or land disturbance within the stream channels shall be conducted without prior authorization from CDFW, U.S. Army Corps of Engineers, & Regional Water Quality Control Board, as appropriate.	CDFW to ensure implementation.	Prior to project
Site maintenance Sensitive vegetation Sensitive species	WQ 4: Pesticide & herbicide use within riparian & wetland areas shall be limited/controlled. Any applications shall be conducted in accordance with herbicide labelling & recommendations from CDFW personnel possessing a valid Qualified Applicator License/Qualified Applicator Certificate.	CDFW to ensure implementation.	Continuous

Construction	WQ 5: Debris or runoff, generated as the result of a project, shall be directed away from any drainage and/or culverts to prevent deposition into waterways.	CDFW to ensure implementation.	During project, & post-project
Well installation	WQ 6: Any additional wells that would be installed on the Reserve shall be subject to the California Well Water Standards, as applicable & may require additional CEQA review.	CDFW to ensure implementation.	Prior to project
Site maintenance	WQ 7: All repairs to wells , springs & guzzlers will be conducted in the daytime & outside of the bird nesting season (March 15- september15) unless a biologist conducts pre activity surveys within one week of scheduled repairs & determines there will be no impacts to nesting birds.	CDFW to ensure implementation.	During project
Site maintenance	WQ 8: Impacts to San Vicente Creek, riparian areas, & wetlands shall be minimized during road use or maintenance activities through the use of BMPs, timing/scheduling of work, & other measures, as deemed appropriate to conditions on-site.	CDFW to ensure implementation.	Continuous

X. LAND USE AND PLANNING.

ENVIRONMENTAL SETTING

No communities exist within the Reserve.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with the applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) No communities exist within the Reserve.
- b) The Plan would not conflict with any other plans relating the Reserve. The 2011 Ramona Community Plan (part of the San Diego County General Plan) designates the property as a Specific Planning Area containing two Resource Conservation Areas (RCAs), which is consistent with the planned management and use of the Reserve.
- c) The plan would not conflict with any applicable habitat conservation plan or natural community conservation plan. Refer also to Section IV(f).

XI. MINERAL RESOURCES.

ENVIRONMENTAL SETTING

Mineral resource extraction is not a land use that is compatible with the mission of CDPR.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a-b) No mineral sources of value to the region, residents of the state or locally are known within the Reserve. Although copper ore was mined on the property between ca. 1885 and 1930, this enterprise was abandoned due to the lack of yield.

XII. NOISE.

ENVIRONMENTAL SETTING

The Reserve is predominantly open space and there is no source of noise currently emanating from the area. Limited seasonal hunting on the Reserve would introduce the sound of periodic gunfire, but such activities shall occur under closely regulated conditions. The large size of the property and the fact that there would be a buffer between the perimeter of the Reserve and the Limited Hunting Zone would limit any noise impacts to adjacent properties.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Generate or expose people to noise levels in excess of standards established in a local general plan or noise ordinance, or in other applicable local, state, or federal standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generate or expose people to excessive groundborne vibrations or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Create a substantial permanent increase in ambient noise levels in the vicinity of the project (above levels without the project)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport? If so, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be in the vicinity of a private airstrip? If so, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Implementation of the Plan would not expose people or generate noise levels in excess of any standards established by local, state, or federal standards.
- b) Implementation of the Plan would not expose people or generate excessive groundborne vibrations or noise levels.
- c) The Plan would not create a substantial permanent increase in ambient noise levels.
- d) The Plan would create a temporary and periodic increase in ambient noise levels on the Reserve when hunting activities are carried out.
- e) The Park is not located within two miles of a public or public use airport.
- f) The Park is not in the vicinity of a private airstrip.

LMP Element	MITIGATION MEASURES – NOISE (NO)	MONITORING REQUIREMENT	TIMING OF ACTION
Recreational compliance Noise	NO 1: The hunting program will be conducted in accordance with all Department hunting regulations & policies, including no nighttime hunting.	CDFW to ensure implementation.	Continuous

XIII. POPULATION AND HOUSING.

ENVIRONMENTAL SETTING

The existing residence buildings at the Reserve would continue to be used by CDFW staff. No new structures for overnight use are planned.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Implementation of the Plan would not induce any substantial population growth, either directly or indirectly.
- b-c) No housing or people would be displaced or as a result of implementation of the Plan.

XIV. PUBLIC SERVICES.

ENVIRONMENTAL SETTING

The project area is located in a fire hazard severity zone classified as “Very High” and falls within a State Responsibility Area (SRA). SRAs are designated by the Board of Forestry pursuant to Public Resources Code section 4125, where the financial responsibility of preventing and suppressing forest fires is primarily the responsibility of the State of California.

Water for fire suppression for existing buildings on the Reserve currently consists of wells. The closest fire stations are Ramona Fire Department Station 81 (3.0 miles from the intersection of San Vicente Rd. and Chuck Wagon Rd.), Ramona Fire Department Station 82 (5.0 miles), Barona Fire Department (6.2 miles), and the CAL FIRE Ramona Station (8.3 miles).

While fire protection is important to this relatively remote and dry, fire-prone area, the lack of new development proposed by the Plan would result in no impact on public services in the area, including fire protection.

	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
WOULD THE PROJECT:				
a) Result in significant environmental impacts from construction associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) There would be a less than significant impact to the need for and availability of fire protection services as a result of the Plan.

XIV. RECREATION.

ENVIRONMENTAL SETTING

The Reserve would provide wildlife-dependent recreational activities such as research and limited Department-sponsored hunting opportunities. Although public uses of the property would be limited and regulated, possible routes for a multi-use equestrian and hiking trail near the northern boundary of the Reserve are being explored. This connector trail would link to existing trails on adjacent County open space land.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Implementation of the Plan would not induce substantial increased use of the Reserve or of other nearby recreational facilities.
- b) The Plan does not include construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

XV. TRANSPORTATION/TRAFFIC.

ENVIRONMENTAL SETTING

Visitors can reach the Reserve via Chuck Wagon Road, a unpaved road that leads south from San Vicente Road, a paved two-lane road that connects Highway 78 in the unincorporated community of Ramona to Wildcat Canyon Road, which leads south to the community of Lakeside (also accessible from Ramona via Highway 67).

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Cause a substantial increase in traffic, in relation to existing traffic and the capacity of the street system (i.e., a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, individually or cumulatively, the level of service standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Contain a design feature (e.g., sharp curves or a dangerous intersection) or incompatible uses (e.g., farm equipment) that would substantially increase hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The proposed Plan is not expected to result in substantial increase in traffic to the area. The Reserve would remained closed to the public other than limited department-sponsored hunting, research, and potential special events.
- b) The Level of Service standards shall not change based on the proposed Plan
- c) There shall be no changes to air traffic patterns as a result of implementation of the Plan
- d) There shall be no design features or incompatible uses that would increase hazards.
- e) Emergency access shall remain sufficient.
- f) The Plan would not substantially increase visitation to the Reserve or lead to inadequate parking capacity.

- g) No policies, plans or programs supporting alternative transportation shall be affected by implementation of the Plan.

XVI. UTILITIES AND SERVICE SYSTEMS.

ENVIRONMENTAL SETTING

There are three wells on the Reserve which serve the various facilities including residences. The facilities compound has two propane tanks; one for the barn and one for the other buildings. Electrical service on the Reserve is supplied by overhead lines from the local grid. The facilities also include five septic tanks plus leach lines.

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Exceed wastewater treatment restrictions or standards of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Would the construction of these facilities cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Would the construction of these facilities cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination, by the wastewater treatment provider that serves or may serve the project, that it has adequate capacity to service the project's anticipated demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations as they relate to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The Plan does not call for any development or activities that would exceed applicable wastewater treatment restrictions or standards. The future siting and construction of any expanded or new onsite wastewater systems would follow the requirements of the San Diego Regional Water Quality Control Board.
- b) The Plan does not anticipate the need to construct new water or wastewater facilities.
- c) Stormwater drainage facilities do not exist on the Reserve due to the limited development that exists.
- d) It is anticipated that existing water resources would suffice to meet the water demands of visitation to the Reserve, as well as the needs of wildlife management and CDFW staff use.
- e) There is no wastewater treatment provider for the Reserve. All wastewater treatment would be onsite through existing septic systems.
- f) The Plan does not propose any development that would result in significantly increased levels of solid waste. The existing landfill (20630 Pamo Road in Ramona) provides sufficient ability to handle the limited waste that would be generated on the Reserve.
- g) All federal, state, and local statutes shall be complied with for the management of solid waste.

CHAPTER 4

MANDATORY FINDINGS OF SIGNIFICANCE

WOULD THE PROJECT:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the potential to eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or native animal community, reduce the number or restrict the range of a rare or endangered plant or animal, as long as the Mitigation Measures included in Chapter 3 (and compiled in Chapter 5) are implemented. Habitat improvement over the long-term is likely to occur as a result of efforts to reduce non-native/invasive weed populations on sensitive habitat throughout the Reserve. The Reserve would remain closed to the public with limited Department sponsored hunting, research, and special events proposed.
- b) Project design and cultural resource mitigation measures would ensure that there is a less than significant impact to this area. While construction and maintenance of facilities, visitor use, and habitat and fire management work all have the potential to disturb surface and/or buried cultural remains, none of these activities is expected to have a significant impact to known or potential cultural resources. Completion of the Plan would allow the CDFW to conduct additional research/studies on the Reserve.
- c) Less than significant cumulative impacts are associated with the project when viewed in conjunction with the effects of past projects, other current projects and probable future

projects.

- d) The project would not have environmental impacts that would cause substantial adverse effects on humans, either directly or indirectly. Noise caused by various maintenance activities and limited visitor opportunities shall be minimal and short term.

CHAPTER 5

BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES

MITIGATION MONITORING PLAN

The purpose of this Mitigation Monitoring Plan is to ensure effective implementation of the Mitigation Measures identified by the Initial Study/MND and proposed by CDFW as part of the Land Management Plan. This Mitigation Monitoring Plan includes:

- Mitigation Measures that the Department must implement as part of the proposed project;
- The actions required to implement these measures;
- The monitoring requirements; and
- The timing of implementation for each measure.

CDFW will use this MMP as the framework for a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). The MMCRP will be created by CDFW to formalize protocols to be followed prior to and during various projects implemented as part of the Land Management Plan. The MMCRP will include, but will not be limited to, the following topics:

- Agency Jurisdiction
- Roles/Responsibilities
- Communication
- Compliance Verification and Reporting
- Project Changes

The CDFW will carry out construction field monitoring to ensure full implementation of all measures. CDFW staff shall also have the authority to stop work if necessary and shall issue non-compliance notices, as appropriate.

MINOR PROJECT CHANGES OR VARIANCES

CDFW Reserve Manager will ensure that any proposed minor project changes that may be necessary due to final engineering or variances or deviations from the procedures identified under the monitoring program are consistent with CEQA requirements. No minor project changes or variances will be approved by CDFW if they are located outside of the geographic boundary of the project study area or create new or substantially more severe significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements unless the appropriate agency has approved the change, does not increase the severity of an impact or create a new impact without appropriate agency approval, and clearly and strictly complies with the intent of the mitigation measure or applicable law or policy.

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether a petition to modify and/or supplemental California Environmental Quality Act (CEQA) review is required. Any proposed deviation from the approved project, adopted mitigation measures, and correction of such deviation, will be reported immediately to CDFW Reserve Manager for review. The CDFW Reserve Manager will

review the variance request to ensure that all of the information required to process the minor project change is included. In some cases, project refinements may also require approval by jurisdictional agencies. In general, a minor project change request must include the information listed below.

- Detailed description of the location, including maps, photos, and/or other supporting documents;
- How the variance request deviates from a project requirement;
- Biological resource surveys or verification that no biological resources would be significantly impacted;
- Cultural resource surveys or verification that no cultural resources would be significantly impacted; and
- Agency approval (if necessary).

LMP Element	MITIGATION MEASURES – AESTHETIC RESOURCES (AR)	MONITORING REQUIREMENT	TIMING OF ACTION
Site maintenance	AR 1: Guidelines will be developed that outline materials & methods to be used for fencing & signs.	CDFW to develop guidelines.	Prior to site maintenance
Recreational monitoring & compliance	AR 2: Public use of the Reserve will be regulated & monitored, with only pedestrians & hunting dogs permitted in the Primary Hunting Zone. Vehicle use on roads will be limited to Department staff, emergency response, & pre-approved groups (e.g., for hunting, bird watching, biological surveys, special events, etc.).	CDFW to insure implementation & monitoring.	Continuous
Recreational access	AR 3: All trail use will be limited to pedestrians & (where applicable) equestrians – i.e., no motorized vehicles or mountain bikes.	CDFW to insure implementation & monitoring.	Continuous
Recreational access	AR 4: To help ensure potential impacts to resources are insignificant, the proposed through trail alignment that extends from Holly Oaks Park & Luel Pond OSP to Southern Oak Road will be established within the footprint of the existing dirt road using the shortest & most direct route possible.	CDFW to evaluate & insure implementation.	Prior to trail construction
Recreational monitoring	AR 5: Continually evaluate recreation activities to identify & report changes that are warranted to maintain consistency with Reserve goals.	CDFW to evaluate on a regular basis.	Continuous
	MITIGATION MEASURES – AIR QUALITY (AQ)		
Site maintenance Fugitive dust	AQ 1: Standard protocols for dust & drift control during maintenance activities such as periodic road grading & spraying for control of invasive vegetation shall be followed.	CDFW to insure implementation.	During site maintenance
Vehicle operations Exhaust emissions	AQ 2: Idling of vehicles shall be minimized to the maximum extent.	CDFW to insure implementation.	During site maintenance & public use activities
Vehicle operations Exhaust emissions Sensitive species	AQ 3: Speed limit on all dirt roads shall not exceed 15 MPH.	CDFW to insure implementation.	During site maintenance & public use activities
	MITIGATION MEASURES – BIOLOGICAL RESOURCES (BIO)		

Nesting birds	Bio 1: To avoid impacts to nesting birds, the clearing of vegetation & construction (when biologically warranted), shall occur outside of the peak avian breeding season, which generally extends from February 1 through September 1 (as early as January 1 for some raptors). If project construction is necessary during the breeding season, a qualified biologist shall conduct weekly surveys, starting within three days prior to start of construction to ensure no nesting birds in the area will be impacted by the project. If an active nest is identified, a buffer shall be established between activities & the nest so that birds are not disturbed. The buffer should maintain a minimum radius of 300 feet (500 feet for raptors), be delineated by temporary fencing, & remain in effect as long as construction is occurring or until the nest is no longer active. During construction, no activities shall take place within the fenced nest zone until the young have fledged, are no longer being fed by the parents, & shall not be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the species involved, ambient levels of construction-related noise, screening vegetation, or other possible factors.	CDFW to insure implementation, conduct surveys, & confirm.	Prior to, & during construction and/or maintenance
Native & sensitive vegetation	Bio 2: Conduct vegetation surveys prior to initiation of any CEQA defined project.	CDFW to insure implementation & confirm.	Prior to project
Native & sensitive vegetation	Bio 3: Inventory & map the invasive plant populations that pose a threat to sensitive/native vegetation communities on the Reserve.	CDFW to insure implementation & map.	
Native & sensitive vegetation	Bio 4: Conduct annual treatment & control of invasive/nonnative plants, targeting species (e.g., tamarisk, nonnative herbs & grasses) that are detrimental to habitats & species of concern.	CDFW to insure implementation & report to appropriate agencies.	Annually
Native & sensitive vegetation	Bio 5: Use BMPs to minimize the introduction & spread of non-native/invasive plant species. (BMPs for land managers in: http://www.cal-ipc.org/ip/prevention/landmanagers.php)	CDFW to insure implementation.	Continuous
Wildlife & sensitive species	Bio 6: Conduct a tracking study of wildlife use along San Vicente Creek to assess the functionality of the drainage as a biocorridor.	CDFW to insure implementation & prepare appropriate reporting.	
Sensitive species	Bio 7: Compile an inventory of the individual Engelmann oaks on the Reserve (i.e., locations, DBH, canopy, seedling/sapling counts, & health of individual trees) as part of the oak woodland assessment. Regularly monitor & control oak pests that could threaten the health of oak woodlands.	CDFW to insure implementation.	Continuous

Riparian disturbance	Bio 8: Every 5 years, or following a major disturbance event, identify & map areas within riparian/wetland habitat that are at high risk for degradation/conversion. Assess impacts to the habitat & any existing infrastructure, & provide recommendations for corrective action.	CDFW to insure implementation.	Every 5 years, or following a major disturbance event
Sensitive habitat	Bio 9: Establish permanent vegetation plots & photo stations within the four major habitat communities (i.e., oak woodland, riparian, shrub land, & grasslands) to document existing conditions, management practices, & vegetation changes over time. Institute monitoring procedures, & periodically evaluate & refine the protocol to improve habitat structure/function. Update CALVEG every 10 years or following any major disaster occurring on the Reserve.	CDFW to insure implementation & report to appropriate agencies.	Continuous
Sensitive species Sensitive land use	Bio 10: Coordinate with local entities, State & Federal agencies, universities, other reserve owners, & institutions on methods to develop & sustain biocorridors on a regional level. Work shall include efforts to acquire & preserve critical parcels of land, inventory & monitor the Reserve's natural resources, & public interpretation. A buffer system to minimize conflicts with nearby land uses, & protect native habitat at Cañada de San Vicente, will also be coordinated with appropriate groups.	CDFW to insure implementation & coordination.	Continuous
Rare & sensitive vegetation	Bio 11: Conduct rare plant surveys every 3 to 5 years, as funding & staffing levels allow, to document the presence/absence of sensitive plant species, including San Diego thornmint. Occurrences shall be recorded & updated after each field effort, & an evaluation of potential threats to survival/persistence will be completed for each rare plant.	CDFW to insure implementation & prepare appropriate reporting.	Every 3 to 5 years
Sensitive species	Bio 12: Conduct surveys for Quino checkerspot butterfly every 3 to 5 years as funding & staffing levels allow. Maintain & regularly update GIS information for the species. Enhance habitat in locations both suitable & previously occupied by the Quino checkerspot butterfly.	CDFW to insure implementation & prepare appropriate reporting.	Every 3 to 5 years
Sensitive species	Bio 13: At a minimum, conduct presence/absence surveys every 1 to 2 years & a habitat assessment for the arroyo toad every 5 years.	CDFW to insure implementation & prepare required reporting.	Survey every 1 to 2 years; habitat assessment every 5 years
Public education & training	Bio 14: Provide education or training to groups recreating on-site & install signage along San Vicente Creek during the arroyo toad breeding season to alert the public/staff of the area's sensitivity.	CDFW to ensure implementation. CDFW to create & review training materials, signage, &	Continuous

		documentation.	
Sensitive species	Bio 15: Control nonnative predators, enhance habitat, seasonally restrict access to arroyo toad breeding locations, & limit roadway use or implement reduced speeds during rainfall events within the San Vicente Arroyo Toad Habitat Zone & throughout the Reserve.	CDFW to insure implementation.	Continuous
Sensitive species	Bio 16: Conduct burrowing owls surveys every 2 to 3 years to establish the presence/absence of the species & habitat usage on the Reserve. Ensure persistence of suitable habitat through the maintenance or creation of natural & artificial burrows.	CDFW to insure implementation & prepare required reporting.	Every 2 to 3 years
Sensitive species	Bio 17: Coordinate and/or participate in local & regional raptor monitoring efforts for species, such as the northern harrier & golden eagle. Potentially limit public use or maintenance activities in areas occupied by the raptors (e.g., grasslands, rocky cliffs) or impose seasonal restrictions to prevent harm/harassment to the species.	CDFW to insure implementation.	Continuous
Sensitive species	Bio 18: Every 5 years, survey the roosting/breeding sites of the Townsend's big-eared bat, & conduct annual inspections & maintenance of the bat gates at the Daley Mine. Assess the status of the pallid bat (and other bat species) on the Reserve through periodic surveys of potential & known roosting/breeding locations every five years, & participation in MSCP radio-telemetry studies. Potentially limit public use or maintenance activities within proximity of known roosting/breeding sites or impose seasonal restrictions. Participate in MSCP bat monitoring efforts, as appropriate.	CDFW to insure implementation & prepare reporting requirements.	Survey roosting/breeding sites every 5 years; Annually inspect & maintain bat gates
Wildlife	Bio 19: Complete an inventory & population counts for game species on the Reserve & update, as needed. Enhance habitat for game & other wildlife species through the creation of brush piles, maintenance of water sources (e.g., guzzlers, wells).	CDFW to insure implementation.	Continuous
Invertebrate species Sensitive species	Bio 20: Conduct baseline Benthic Macro-Invertebrates (BMI) sampling along San Vicente Creek, & monitor species diversity & abundance over time to assess water quality within the drainage.	CDFW to insure implementation & prepare reporting requirements.	Continuous

Public education & training Sensitive species Sensitive cultural resources	Bio 21: Pre-hunting briefings shall be required to educate hunters regarding all Mitigation Measures required including: protection of cultural resources, protection of natural resources, & protection of species listed by CDFW & USFWS as threatened, endangered, or species of concern.	CDFW to ensure implementation. CDFW to create & review environmental training materials, documentation of environmental training.	Prior to hunt
Site maintenance Sensitive species	Bio 22: Repairs to roads, bridges, & culverts will be conducted within the existing footprint of the roads/structures, during normal daytime business hours. Prior to any road work (surface grading) within the Arroyo Toad Management Zone, roadways will be walked by a biologist to ensure no arroyo toads are present. Removal of vegetation overgrowth of the roads, bridges, & culverts will be conducted outside the bird nesting season (March 15-September 15) unless a qualified biologist completes pre-activity surveys to ensure no nesting birds will be impacted. All road gravel that is brought in from outside sources will be washed off-site to help prevent the spread of non-native invasive plants. If a significant impact will be likely, such as the potential take of a listed species, all work will be stopped until it is determined that conditions are safe to continue.	CDFW to insure implementation & conduct surveys.	Continuous
Site maintenance Wildlife movement Sensitive species	Bio 23: To facilitate wildlife movement: survey, evaluate, & remove unneeded internal fencing. No removal or installation of fencing/signage will occur during the bird nesting season (March 15 th - September 15 th unless a biologist conducts a pre activity survey within one week of scheduled work & determines there will be no impacts to nesting birds.	CDFW to insure implementation & conduct surveys.	Continuous
Wildlife	Bio 24: Evaluate & repair/enhance springs, guzzlers, & existing wells to enhance water availability for game & other wildlife species.	CDFW to insure implementation	Continuous
Research fieldwork	Bio 25: Facilitate & coordinate scientific research required to implement the LMP & focus environmental research on topics that will help CDFW achieve the goals & objectives outlined in the LMP, & thereby enhance adaptive management of the Reserve. Identify research projects that are consistent with LMP goals for environmental research on the Reserve & develop guidelines for submitting proposals for such work. Require submission of field data & final reports of all authorized research conducted on the Reserve.	CDFW to insure implementation & coordination	Continuous

Sensitive vegetation	<p>Bio 26: Non-native plants will be controlled where these species threaten to reduce the quality of habitat for wildlife or where non-natives pose a competitive threat to important native plant communities. Non-native plant species will be controlled using an integrated approach that relies on both non-chemical & chemical (i.e. herbicide) use strategies. The risk that herbicides pose to non-target organisms is dependent on both exposure & toxicity. This relationship between risk, exposure & toxicity can be assessed using the Hazard Quotient (HQ) method (http://www.fs.fed.us/foresthealth/pesticide/pdfs/PrepEnvironmentalDoc_11-2014.pdf). To reduce the risk posed to wildlife species at the Reserve, no herbicide will be used unless its calculated HQ value is below the Level Of Concern for the appropriate exposure scenario. Additionally, the risk to non-target wildlife & special-status plant species will be reduced by making low-volume, spot-treatments using hand-held equipment targeted specifically at non-native plants.</p>	CDFW to insure implementation & prepare appropriate reporting	Continuous
	MITIGATION MEASURES – CULTURAL RESOURCES (CR)		
Historical resources	<p>CR1: A current/updated inventory, GIS mapping, & informational database for cultural resources within the Reserve that may be eligible for listing in the California Register of Historical Resources and/or the National Register of Historic Places shall be maintained. All unlisted, eligible, or potentially eligible historical resources should be mapped, recorded, & evaluated to determine their eligibility status for placement on the National Register or California Register of Historic Places.</p>	CDFW to ensure implementation. CSP to confirm.	Continuous
Cultural resources	<p>CR2: Prior to any actions that have the potential to disturb the area of known or possible archeological sites, or in areas that have not been inspected for archaeological resources within the past 5 years, Environmental Review will be completed & additional research, archaeological survey, and/or testing will be carried out to determine if significant cultural resources exist.</p>	CDFW to ensure implementation. CSP to confirm.	Prior to project
Archaeological research & fieldwork	<p>CR3: Any fieldwork such as archaeological survey, testing, or other onsite research shall require pre-project environmental review & potentially permitting if work is being done by outside consultants or non-state entities.</p>	CDFW to ensure review. CSP to confirm.	Prior to fieldwork
Cultural resources	<p>CR4: Locations of previously recorded cultural sites shall be made known to CDFW staff (e.g., Reserve manager, game wardens) so that they can monitor site conditions & watch for deterioration and/or vandalism.</p>	CDFW to ensure implementation. CSP to confirm.	Prior to site monitoring

Cultural resources	CR5: The effects of visitor use & natural erosion on known cultural resource sites shall be assessed.	CDFW to ensure implementation. CSP to confirm.	Continuous
Historical resources	CR6: Additional studies (e.g., archival research, detailed site & structure recordation, GIS mapping, subsurface testing, etc.) shall be conducted for any proposed project or undertaking that has the potential to disturb any known or potentially eligible historical resource.	CDFW to ensure implementation. CSP to confirm.	Prior to project
Cultural resources	CR7: Any new facilities including roads, trails, fence lines, structures, buildings, etc. shall be designed & constructed to avoid cultural resources to the extent possible. As per professional standards for assessing & mitigating significant impacts to historical resources, treatment measures in compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties will be implemented to reduce potential significant impacts to a level less than significant.	CDFW to ensure implementation. CSP to confirm.	Prior to, & during project
Cultural resources	CR8: If unexpected cultural remains are uncovered during any project activities, work will be stopped in that area so that the resource can be recorded, the nature of the deposit can be determined, & an appropriate avoidance, protection, or recovery plan can be implemented.	CDFW to ensure implementation. CSP to confirm.	During project
Cultural resources	CR9: Introduction of incompatible elements shall be avoided. Restoration & replacement of historic architectural features should be based on detailed & accurate representation of original features as substantiated by historical, physical, pictorial, or archaeological evidence.	CDFW to ensure implementation. CSP to confirm.	During project
	MITIGATION MEASURES – HUMAN REMAINS		
Human remains	CR 10: In the event that human remains are discovered, work will cease immediately in the area of the find & the project manager will notify the appropriate CDFW personnel. The CDFW Reserve manager, regional manager, or authorized representative will notify the County Coroner/Medical Examiner in accordance with §7050.5 of the California Health & Safety Code. If the coroner/ME determines the remains represent Native American internment, the Native American Heritage Commission in Sacramento will be consulted to identify the most likely descendants & appropriate disposition of the remains. Work will not resume in the area of the find until proper disposition is complete. (PRC §5097.98).	CDFW to ensure implementation. CSP to confirm.	During project
	MITIGATION MEASURES – GEOLOGY & SOILS (GEO)		
Construction activities	Geo 1: The most recent revision of the California Building Code shall be implemented for all new & modified structures to mitigate the risk of loss, injury, or death due to geologic hazards.	CDFW to ensure implementation.	Prior to, & during project

Construction activities	Geo 2: Any paleontological resources that are unearthed as part of ground-disturbing activities would result in the suspension of work in order to evaluate & potentially recover the findings.	CDFW to ensure implementation. CSP to confirm.	During project
Construction activities	Geo 3: To the maximum extent feasible, any new facilities shall be designed & constructed to conform with the landscape's natural contours, so as to minimize overall topographic change.	CDFW to ensure implementation.	Prior to, & during project
	MITIGATION MEASURES – HAZARDS/HAZARDOUS MATERIALS (HAZ)		
Hazardous substances	Haz 1: In the case that hazardous waste such as lead or asbestos are found within building materials that will be impacted during modification or demolition, appropriate measures will be taken to ensure their safe removal & compliance with appropriate laws & regulations.	CDFW to ensure implementation.	During project
Fire	Haz 2: Fire Management activities such as fuel modification shall be subject to site specific planning with CAL FIRE & conducted in accordance with CAL FIRE & CDFW regulations & policies.	CDFW to ensure implementation. CAL FIRE to confirm.	Prior to project
	MITIGATION MEASURES – HYDROLOGY/WATER QUALITY (WQ)		
Erosion & sedimentation	WQ 1: BMPs to address erosion & excess sedimentation shall be incorporated into activities/operations that have the potential to cause discharges off-site. Weed-free products will be used to the extent possible to minimize the spread of exotics.	CDFW to ensure implementation.	During project
Site maintenance	WQ 2: BMPs employed during surface-disturbing activities shall comply with all applicable water quality standards.	CDFW to ensure implementation.	During project
Site maintenance Sensitive vegetation	WQ 3: No vegetation clearing or land disturbance within the stream channels shall be conducted without prior authorization from CDFW, U.S. Army Corps of Engineers, & Regional Water Quality Control Board, as appropriate.	CDFW to ensure implementation.	Prior to project
Site maintenance Sensitive vegetation Sensitive species	WQ 4: Pesticide & herbicide use within riparian & wetland areas shall be limited/controlled. Any applications shall be conducted in accordance with herbicide labelling & recommendations from CDFW personnel possessing a valid Qualified Applicator License/Qualified Applicator Certificate.	CDFW to ensure implementation.	Continuous
Construction	WQ 5: Debris or runoff, generated as the result of a project, shall be directed away from any drainage and/or culverts to prevent deposition into waterways.	CDFW to ensure implementation.	During project, & post-project
Well installation	WQ 6: Any additional wells that would be installed on the Reserve shall be subject to the California Well Water Standards, as applicable & may require additional CEQA review.	CDFW to ensure implementation.	Prior to project

Site maintenance	WQ 7: All repairs to wells , springs & guzzlers will be conducted in the daytime & outside of the bird nesting season (March 15- september15) unless a biologist conducts pre activity surveys within one week of scheduled repairs & determines there will be no impacts to nesting birds.	CDFW to ensure implementation.	During project
Site maintenance	WQ 8: Impacts to San Vicente Creek, riparian areas, & wetlands shall be minimized during road use or maintenance activities through the use of BMPs, timing/scheduling of work, & other measures, as deemed appropriate to conditions on-site.	CDFW to ensure implementation.	Continuous
	MITIGATION MEASURES – NOISE (NO)		
Recreational compliance Noise	NO 1: The hunting program will be conducted in accordance with all Department hunting regulations & policies, including no nighttime hunting.	CDFW to ensure implementation.	Continuous

CHAPTER 6

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CHAPTER 7

REPORT PREPARATION

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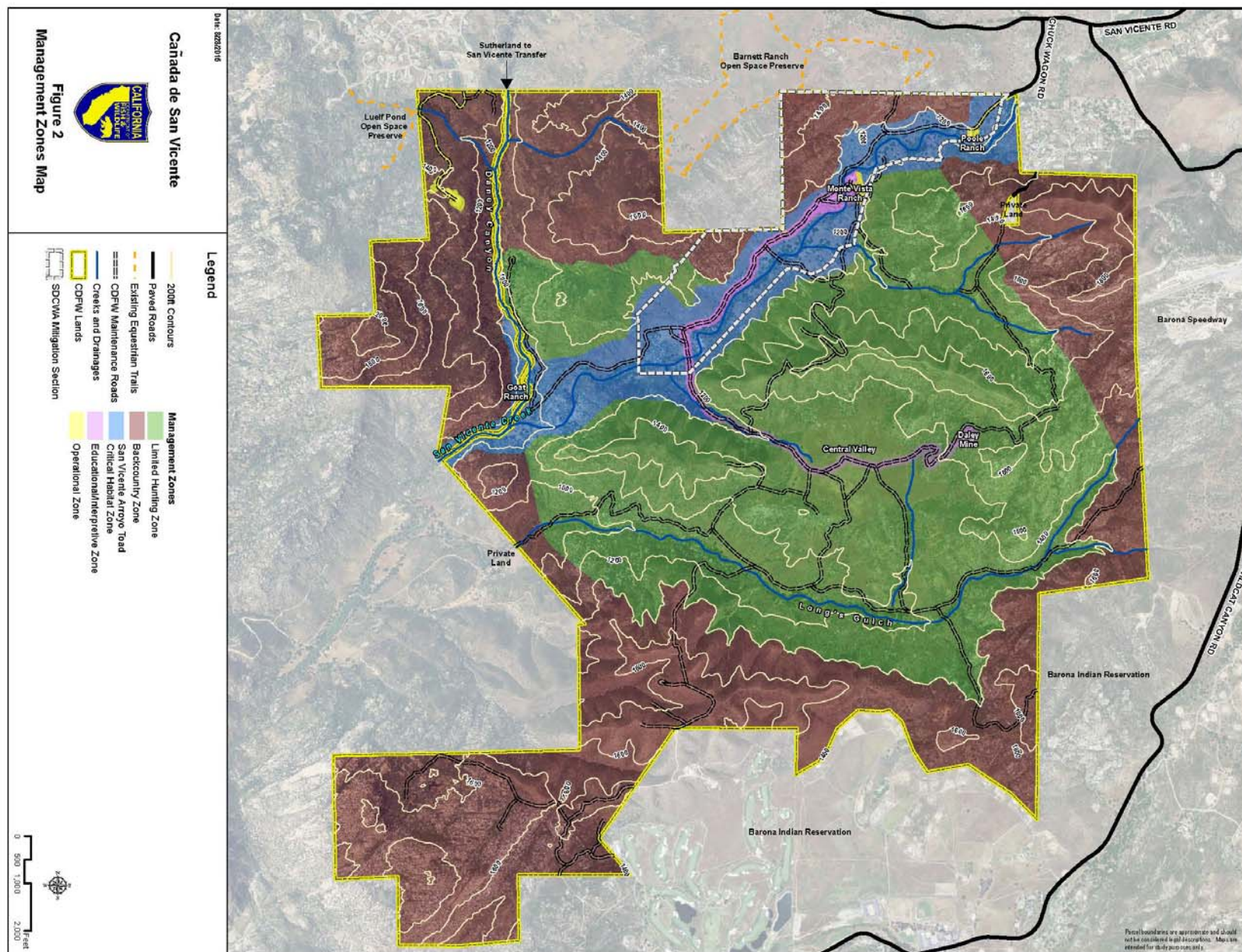
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Figure 2 – Management Zones Map



B. ABBREVIATIONS

ADA	Americans with Disabilities Act
ASMD	Area-Specific Management Directives
BMP	Best Management Practice
CalFire/CDF	California Department of Forestry and Fire Protection
CDFG	California Department of Fish and Game (now CDFW)
CDFW	California Department of Fish and Wildlife (formerly CDFG)
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database (CDFW)
CNPS	California Native Plant Society
CSV	Cañada de San Vicente
ER	Ecological Reserve
GIS	Geographic Information System
HCP	Habitat Conservation Plan
IS	Initial Study
LMP	Land Management Plan
MND	Mitigated Negative Declaration
MSCP	San Diego County Multiple Species Conservation Program Sub-Regional Plan
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
PRC	[California] Public Resources Code
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SDCWA	San Diego County Water Authority
SSC	Species of Special Concern (CDFW)
SWPPP	Stormwater Pollution Prevention Plan
USACOE	United States Army Corps of Engineers
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
WA	Wildlife Area
WPCP	Water Pollution Control Plan

C. RESPONSES TO COMMENTS

Agency Response

1-A Thank you for your support and comment submittal.

Comment Letter 1 – Mark Hutton

From: [mark hutton](#)
To: [Review, Environmental@Parks](#); [Review, Environmental@Parks](#)
Subject: RE: Notice of Availability - Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente Ecological Reserve
Date: Wednesday, May 13, 2015 5:21:59 PM

Thanks for the opportunity to review the Draft Management Plan and Neg. Dec. for the Cañada de San Vicente Ecological Reserve. I have a few comments that I'd like to share.

1-A First let me say that I appreciate and agree with the decision to designate Rancho Cañada as an Ecological reserve. It is proper and fitting considering the sensitive and endangered species/habitat onsite, the fact that it's a primary watershed for San Vicente Reservoir and that it is an integral component to the County of San Diego's MSCProgram. I also agree with the proposal to allow hunting on the Reserve, particularly if it involves the elimination of invasive species that compete with natives, or when populations of game animals exceed the area's carrying capacity. I am especially supportive of using the Boy Scouts or other youth groups in this capacity as I believe that they will be well supervised and that it teaches the next generation(s) stewardship. The document wasn't completely clear (to me) when it came to the specifics of public access for riding and hiking. I know there was a great deal of public support for unfettered access at the October 29, 2013 meeting in Ramona and I'd like to express the opposing view. Because of the way that the County of San Diego (County) has advocated for and structured their Trails Plan (in Ramona particularly) local trails boosters believe that it is their right to propose trails across both private and public property regardless of how the property owners feel about it. The County was allowed to include public trails as a component in the MSCP agreement they made with Federal and State Wildlife agencies and now it's predominant view of MSCP preserves is as recreational areas, with public access paramount. That attitude threatens to undermine the MSCP and the purpose for which it was created, namely to protect listed species and their habitats. Given the population in San Diego county, and the relative closeness of much of the MSCP preserve properties to that mass of humanity, unfettered access would be an unnatural disaster. As such, on the CSVER I am in support of limited, well supervised public access for educational and environmental-restoration purposes. In closing I'd like to say that I have a great deal of faith that the CDFW has a good overall understanding of the relevant issues (as reflected in the reviewed documents) and that they will continue to be good neighbors and excellent guardians of the Cañada de San Vicente Ecological Reserve.

Mark Hutton

Agency Response

2-A Thank you for your support and comment submittal.

Comment Letter 2 – Rick Morgal

From: [Rick Morgal](#)
To: [Review, Environmental@Parks](#); [Review, Environmental@Parks](#)
Subject: RE: Notice of Availability - Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente Ecological Reserve
Date: Wednesday, May 13, 2015 11:09:01 PM

Thank you for the opportunity to review the Draft Management Plan and Neg. Dec. for the Cañada de San Vicente Ecological Reserve.

I am pleased to see that this piece of land will be preserved as a Ecological Reserve rather than designated as a recreational area. A limited human component is necessary for land to remain natural.

The close proximity of San Diego to the Reserve and the popularity of trails such as the city of Poway's Iron Mountain Trail provide a visual incentive, inviting people to explore the next piece of land in our back country.

Although I believe its very important for urban dwellers to experience nature, its not necessary for all lands to be open to anyone who has a GPS and acces to a car, pretty much everyone in San Diego County.

There needs to be places where nobody goes on a regular basis and on occasion a few that will respect and appreciate the opportunity are allowed to experience nature without a lot of human impact.

Cañada de San Vicente Ecological Reserve is such a place. There are many locations San Diego where people can ride their horses or mountain bikes. Being an avid mountain biker I know how disconnected I get when a sweet downhill is in front of me, the immediate flora and fauna can not be truly absorbed at 25 mph. That's why there is Mission Trails Park and the like.

As for horse back riders, they may be a bit more connect to the local environs than a mountain biker but their feet aren't even on the ground. There is an undeniable disconnect with your local environment that occurs the moment your feet leave the ground, even on a horse.

The only way one can truly BE in nature is to start the connection with the natural space beginning from the ground up.

The designation of Cañada de San Vicente as an Ecological Preserve is an acknowledgement of the need for space to be designated for nature to flourish without people.

And for those few lucky souls that receive an opportunity to walk the Reserve and experience the natural beauty erupting from the ground, full of pristine biodiversity only seclusion can nurture, I can only hope they truly understand how lucky they are.

We need to preserve land for nature, thank you for doing what you can to foster this need through Cañada de San Vicente. A place that enhances all our lives, just because it exists, not because we can all go there.

Rick Morgal

2-A

Agency Response

3-A Thank you for your support and comment submittal.

From: [Diane Conklin](#)
To: [Review, Environmental@Parks](#); [Review, Environmental@Parks](#)
Cc: [Diane Conklin](#)
Subject: Notice of Availability - Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente Ecological Reserve
Date: Thursday, May 14, 2015 4:36:55 PM

To Whom It May Concern:

Thank you for the opportunity to review the Draft Management Plan and Negative Declaration for the Canada de San Vicente Ecological Reserve. As a member of a community located in the general area of the Reserve, I applaud the Department's advocacy for the protection of this land.

As a new resident to Ramona, I moved to Kimball Valley Road, a dirt road off of historic Mussey Grade Road in 1999. A portion of the Monte Vista Ranch, as it was known then, is visible from the upstairs windows of my home. In that regard, this land is not a figment of my imagination but is a real, timeless and perfect place where the rhythms of nature remain unhindered by untoward development and destruction.

Although I am writing to you in my personal capacity, I wanted you to know that I advocated for this land to be protected and preserved as the spokesperson of the Mussey Grade Road Alliance, a 501(c)(4) organization I started in 1999 to preserve and protect historic Mussey Grade Road and environs.

The threat of intensive development of the Monte Vista Ranch haunted me in my early years of living in Ramona. I was also worried about fire evacuations from the San Diego Country Estates, should the ranch be heavily populated with both people and riding horses, one plan that was proposed at the time. Early on I contacted the Nature Conservancy by telephone to inform them of this parcel, as I thought they might be interested. I spoke again to a Nature Conservancy representative on Earth Day in Balboa Park many years ago. I also suggested to the previous owner of the ranch, Eric Johnson, that he sell the land to the conservancy. Many Alliance members advocated against the development of this land and for its preservation. They attended, along with myself, San Diego Planning Commission hearings and other meetings to spread the word that the Mussey Grade community wanted to see this land preserved rather than commercially developed.

I was thrilled to learn of the purchases by the Nature Conservancy years ago and the ultimate stewardship of this land by the California Department of Fish and Wildlife, and although I was unable to attend the meetings regarding the management plans for this land, I was kept informed by a neighbor who cares passionately about this space and what happens to it.

Therefore, I am writing to the Department now to let you know that it seems to me the plan proposed is the best of all possible worlds, in that it is dedicated to the *preservation* of this incredible resource. This kind of land comes along only very rarely. With that in mind, I hope that the Department will be gentle in its handling of this Reserve. The difficult work to preserve, once it is understood and then communicated to the world at large, ultimately becomes transformed into not only the intended results but surprising and wonderful consequences that will continue to enrich the natural world. The long term vision, beyond ourselves, is the *key* to knowing what we don't want to lose in our present world and the world of the future.

Agency Response

3-A

I am personally in favor of limited and supervised use of this resource by the Department in order to preserve the greater part of this acquisition. I am, myself, willing to forgo the pleasure of stepping onto this land so that other species can thrive and multiply and live in peace.

Thank you for your attention to this email comment.

Regards,

Diane Conklin
Ramona, CA

4-A Thank you for your support and comment submittal.

4-B The Backcountry Zone (buffer zone) boundary is set up as a general attempt to spatially define management concepts of the Reserve (see LMP page 4-5). Safety was taken into inconsideration when the boundaries were drawn, but topography also played a role. In general, the buffer zone is easily defined and recognized when it runs along ridgetops (see buffer zone boundary map on LMP page 4-7). Prior to any public access and in particular hunting access, signage will be placed to demarcate boundaries. As Backcountry Zone boundary signage is installed, its effectiveness will be assessed and adjustments will be made if needed.

Comment Letter 4 – John Markle

From: [John Markle](#)
To: Review_Environmental@Parks
Subject: CSV Reserve plan
Date: Friday, June 05, 2015 1:27:24 PM

TWIMC

My concerns over possible trespassing are largely relieved by your proposed plan.

4-A

In general I support hunting activities on public lands and think your plan does also.

4-B

However I would like to see a much larger buffer zone (Rifle) for lower Longs Gulch as my house will be near that border.

Thank you for all of your hard work! John Markle

5-A Thank you for your support and comment submittal.

5-B In September 2007 the San Diego County Water Authority (CWA) agreed to provide \$5,800,000 to purchase approx. 392 acres as mitigation of biological impacts for the raising of the San Vicente Dam. In addition, the CWA provided an endowment in the amount of ≈\$467,403 to fund the perpetual adaptive management of the 392 acres for the benefit of biological resources located on the property. The purpose of this project was to assure the maintenance of a core conservation area within the San Diego County Multiple Species Conservation Plan (MSCP) Sub-Regional Plan & Natural Community Conservation Plan (NCCP) and improvement of wildlife corridors, preservation of habitat for rare, threatened, and endangered species, protection of the San Vicente Reservoir watershed, and opportunities for expanding CDFW educational activities.

In June 2008, the Department acquired 4,056 acres from The Nature Conservancy for ≈\$15,921,000 using a U.S Fish and Wildlife Service Section 6 Grant (≈\$6,221,000) and State Coastal Conservancy Subgrant #04-131 (≈\$9,700,000) funds. The land was purchased for the protection of the natural resources including threatened and endangered species within San Vicente Reservoir Watershed.

In June 2010, the Department purchased 311 acres (Spitsbergen property) for ≈\$2,100,000.00 using a U.S. Fish and Wildlife Service Section 6 Grant. This acquisition protected undisturbed grasslands, chaparral, oak woodlands, and riparian habitat along the San Vicente Creek watershed. It also enhanced existing federal, State, and local NCCP efforts to secure key wildlife linkage and preserve core areas of habitat within the MSCP.

In September 2014, the Department acquired 256 acres (Bonfils) for ≈\$450,000 using a U.S. Fish and Wildlife Service Conservation Planning Land Acquisition Grant (≈\$292,500) and Habitat Conservation Fund (HCF) Proposition 117 (≈\$157,500) funds. This acquisition secured a key wildlife linkage, protected a core area of habitat and enhanced the existing MSCP.

In addition to the above purchases The Nature Conservancy provided funding for the operations and maintenance of the Reserve.

5-C *(See next response page)*



Jean Jancaitis
Stewardship Manager
The Nature Conservancy
402 West Broadway, Suite 1350
San Diego, CA 92101

telephone 619 209 5830 ext. 14407
cell phone 541 221 5179
e-mail jjancaitis@tnc.org

SSC Environmental Coordinator
2797 Truxtun Road, Barracks 26
San Diego, California 92106

Dear SSC Environmental Coordinator, California State Parks and California Department of Fish and Wildlife,

5-A

Throughout California, The Nature Conservancy (the Conservancy) and California Department of Fish and Wildlife (CDFW) partner on land protection and management with excellent conservation outcomes. The Conservancy was a partner in the protection of a majority of the Cañada de San Vicente Reserve (Reserve) with the CDFW. As a result, we have a deep interest in ensuring that CDFW manages the Reserve to the high standard it has shown to be capable throughout the state. Overall, the Draft Land Management Plan (LMP) that has been developed for the Reserve identifies well thought-out goals and tasks based on the expected staffing levels.

The Conservancy supports the prioritization and focus given in the LMP to preservation and enhancement of habitat for species and natural communities of the Reserve. It is with this focus on protection and enhancement of natural communities that we submit our comments on the LMP for consideration.

Funding Sources

5-B

The Reserve was assembled through various funding sources, including US Fish and Wildlife Section 6 funds and grants from the California Wildlife Conservation Board and California Coastal Conservancy. We feel it would be of value to describe in more detail the funds used to acquire the various portions of the Reserve and the restrictions and requirements that pertain to each funding source. Describing the terms of the funding agreements will make them available to both future managers and the general public to ensure actions are compatible with the intent of the funding source.

Fire Management

5-C

Fire management is one of the most challenging aspects of managing scrub-dominated ecosystems in southern California, particularly given the increased fire frequencies of the past two decades that have type converted thousands of acres of chaparral and coastal sage scrub. While the document references the use of prescribed fire in several locations, we believe that prescribed fire should only be considered as a tool for the restoration and maintenance of grasslands and not the other vegetation communities on the Reserve. Fire return intervals needed to prevent degradation of

Agency Response

- 5-C** Though fuel reduction activities are primarily proposed for areas with infrastructure (around buildings, wells, etc.) the Department wishes to keep all potential fuel reduction options available for use. Potential use of prescribed fire in shrub habitats on Cañada de San Vicente would be to insure efficient fire hazard reduction, and minimize the reserve to high fire frequency. Refer also to Keeley and Fothjeringham (2001), Keeley (2002), and Halsey et. al. (2009).
- 5-D** The reduction of dead or decadent shrubs will focus on areas immediately adjacent to roadways and is not meant to be conducted throughout the roadless areas of the Reserve.
- 5-E** Fire management is covered in LMP section 4.6.6 (Fire and Fire Management). Although reduction of fire and fire frequency it is not spelled out specifically within the Climate Change section, several of the management action examples will in fact help to reduce fire and fire frequency. Example: fuel modification/reduction and the control of exotic weeds.
- 5-F** Minor revision will be made to LMP pages 4-19 and 4-20 (replacement of term “create” with “enhance”).
- 5-G** See LMP Section 4.5.1 (Hunting Element), page 4-45. Goal 1 - Task 4 provides for population counts of these species, and Goals 2 and 3 - Tasks 1, 2, 3, and 4 also provide for the study of potentially hunted wildlife and that population counts would be conducted prior to any hunting activities. There have been numerous studies conducted nationwide that provide information supportive of managed hunting as not having a negative effect on the hunted species and their niche. Minor revisions will be made to page 4-45.
- 5-H** *(See next response page)*

5-C
(cont'd)

coastal sage scrub and chaparral are now generally considered to be 35 to 75 years, especially at warmer and drier inland sites such as the Reserve. Based on the fact that the entire Reserve burned in the 2003 Cedar Fire, use of prescribed fire should not be considered for many decades and only if the Reserve does not burn in another wildfire.

5-D

Fuel reduction activities and clearing of dead or decadent shrubs discussed on Page 4-54 should only be completed in strategic areas on the Reserve that will benefit resources in immediate need of protection. These types of activities should not be considered habitat enhancements, but purely action necessary to protect important resources. For example, with the high level of damage to a majority of the oak trees on the Reserve from the 2003 Cedar fire and general lack of recruitment, the oak trees would likely benefit from protection from future fire by treatment of ladder fuels only within three feet of individual oak tree trunks.

5-E

For Section 6, Climate Change, we recommend adding a strategy focused on minimizing disturbance and reducing the size and frequency of wildfires. Climate change is expected to increase temperatures and wildfires. As a result of warmer temperatures and increased drought-stress, it will take coastal sage scrub, chaparral and oak woodlands longer to recover following disturbance such as fires which will likely require longer fire-free periods to allow for recovery.

For recent research on the effects of fire, fire suppression, and fuels management on southern California's scrubland communities and species as identified in Section 4, we recommend publications by Paul Zedler, Jon Keeley, Alexandra Syphard, Carlton Rochester, Cheryl Brehme, and Jay Diffendorfer, among many others.

Quino Checkerspot Butterfly

5-F

We support active management of Quino checkerspot butterfly as identified on page 4-19 and agree that management is necessary to maintain its habitat. We suggest, however, that restoration of habitat for Quino Checkerspot only be conducted within *existing* openings of scrub that support suitable, but unoccupied habitat. We do not support the *creation* of openings within scrub habitat, as this would entail the removal of scrub, one of the most imperiled habitats on earth.

Hunting

5-G

We feel that introducing hunting of any native species is premature without studying the sustainability of the population. As is proposed for deer, small and non-game species (Page 4-40), we propose population studies be conducted for upland game birds before hunting of these species begins. We also do not support the hunting of coyotes, even if the population can support it. Allowing hunting of this species could reinforce the negative attitudes toward a species that is increasingly important in rural areas as they keep mesopredator populations in check, benefiting native bird populations.

5-H

Of particular concern is the proposal to allow hunting within the San Vicente Arroyo Toad Habitat Zone. We are concerned that this use may be incompatible with the goal of protecting and enhancing

Agency Response

- 5-H** Pre-hunt briefings shall be required to educate hunters regarding protection of cultural resources, protection of natural resources and protection of species listed by CDFW and USFWS as threatened, endangered, or species of concern. Additionally, the optimum arroyo toad breeding habitat on the Reserve lies within the area of the compound (Operational Zone - see map on LMP page 4-7) within close proximity to structures. No hunting will be allowed within this area and because of the seasonality, daytime nature, and restricted access there will not be any direct/indirect take or disturbance of arroyo toads throughout the San Vicente Arroyo Toad Habitat Zone. Finally, managing wild turkey populations through the use of hunting may enhance arroyo toad populations within the Reserve.
- 5-I** Some CDFW sponsored hunts utilize the use of trained dogs to retrieve game. All hunters are ethically required to stop a hunt for the purpose of searching for game animals after the shot. A well trained hunting dog is essential in preventing the unnecessary loss of game birds.

5-H
(cont'd)

habitat for the Arroyo toad and strongly recommend further detailed study and analysis prior to proceeding with this proposed use.

5-I

We do not support the use of hunting dogs in collaboration with hunting in any areas of the Reserve.

Public Access

As stated in the LMP, the limited staff presence at the Reserve would make it very difficult to open a trail system to the general public while ensuring public safety and ensuring that the habitat resources on the Reserve are protected. We are pleased to see the level of care being taken by CDFW before opening any public trail on the Reserve due to staffing limitations.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jean Jancaitis", with a stylized flourish at the end.

Jean Jancaitis

- 6-A** Opening trails within the Reserve, including those suggested in the Ramona Communities Trails and Pathways Plan (County Trails Master Plan), could not be incorporated into the Land Management Plan because of the reasons outlined below and within section 4.5.4 of the LMP.

According to §630 of the CCR Title 14 Natural Resources “Ecological Reserves are established to provide protection for rare, threatened, or endangered native plants, wildlife, aquatic organism and specialized terrestrial or aquatic habitat types. Public entry and use of ecological reserves shall be compatible with primary purpose of such reserves.”

In September 2007, using monies from SDCWA per agreement, the CDFW purchased approximately 392 acres of land as mitigation for biological impacts associated with the raising of the San Vicente Dam. The purpose of this acquisition was to assure the maintenance of MSCP core conservation area and improvement of wildlife corridors, preservation of habitat for rare, threatened, and endangered species, and protection of the San Vicente Reservoir watershed.

Other acquisitions adding to the current acreage of the Reserve were acquired for the protection of natural resources including threatened and endangered species within San Vicente Reservoir watershed and to enhance existing federal, State, and local NCCP efforts to secure key wildlife linkages and preserve additional core areas of habitat within the MSCP.

There is only one entrance road into the reserve (Chuckwagon Road), and that runs through the above-mentioned mitigation area as well as goes through the main compound and housing area of the Reserve. Unrestricted use of this road could cause impacts to the federally endangered arroyo toad and its habitat. There are also no designated parking lots within the Reserve.

Additionally, there are numerous other constraints in designating trails along the current maintenance roads: the potential for trails to dead-end at the boundaries of private or Reservation lands (such trails would not allow for through-trail use); loop (out-and-back) trails within the boundaries of the Reserve would cause an overuse of some areas; limited staffing to monitor and patrol the trails; and conflicts between trail use and resource protection.

With exception to a pre-existing dirt road connecting Holly Oaks County Park and Luelf Pond Open Space Preserve to Southern Oak Road, no additional trails are being proposed within Cañada de San Vicente Ecological Reserve. The CDFW will continue to investigate a potential connector trail from Holly Oaks and Luelf Pond to the Barnett Ranch Open Space Preserve. No sustainable connector has been identified at this time due to the need to remove large expanses of native habitat; moreover, CDFW does not own the water transfer within Daney Canyon which must be crossed.

Hunting, a wildlife dependent use, would not be a stressor to the Reserve’s resources as it would be very limited according to season, date, time, species etc. as provided in section 4.5.1 (Hunting Element) and Title 14 of the Fish and Game codes. In addition, the hunts would be managed by the CDFW and access would be regulated and monitored.

Within a five (5) mile radius of the City of Ramona there are approximately 292 miles of multi-use trails. Within ten (10) miles there are approximately 512 miles of multi-use trails and within fifteen (15) miles there are 834 miles of multi-use trails on numerous conserved public lands including but not limited to Luelf Pond Preserve/Holly Oaks Park, Barnett Ranch Preserve, Goodan Ranch/Sycamore Canyon Preserve, Santa Ysabel Preserve, El Capitan Preserve, Oakoasis Preserve, Simon Preserve, Boden Canyon Ecological Reserve (hiking only), Blue Sky Ecological Reserve (hiking only), Mount Gower Preserve, William Heise County Park, and the Cleveland National Forest.

Comment Letter 6 – Sandra Showalter

To: Review_Environmental@Parks
Cc: deborah.schoenleber
Subject: RE: Notice of Availability - Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente Ecological Reserve
Date: Tuesday, May 12, 2015 4:41:31 PM

Please summarize findings by answering the following:

1. Will the public have access to trails in Canada de San Vicente?
2. If so will trails be multi use?
3. When will the trails be open to the public?

While I appreciate the information – it is ridiculous to expect people to wade through several hundred pages to try and find an answer to simple questions.

For the last several years that area has been used as a private residence for fish and game while the entire planning process has worked to exclude all but the most determined public comment.

Thank you for your time in responding to my questions.

Sandra Showalter

6-A

Agency Response

7-A *See response 5-B*

7-B *See response 6-A*

Comment Letter 7 – Joe Minervini

To: Review_Environmental@Parks
Cc: [ramona sentinel NEWS DESK](#)
Subject: public Lands: Canada de San Vincente
Date: Friday, May 22, 2015 8:08:26 AM

7-A

I get very emotional when I read about all the lands the public cannot utilize because of reasons dictated by non-responsive enviro bureaucrats. These properties were acquired with public tax dollars over 5 years ago and you misguided government types maintain barded wire fences to keep us out. I have hiked the Barnett preserve for

7-B

years and despise your barbed wire and your sign that tells us to keep out. Many of us don't have the time to drive miles to find hiking trails. You and the County have funneled thousands of hikers and horse riders on to the few, over-used trails that exist within close proximity....that really stinks. Give us what WE paid for...

Joe Minervini
Ramona, Ca.

Agency Response

8-A See response 5-B for information on funding sources and the reasons for which this property was acquired.

From: [Allison Farrin](#)
To: Review_Environmental@Parks
Subject: Canada de San Vicente
Date: Wednesday, May 27, 2015 8:42:34 PM

Gentlemen:

I have quoted extensively from the Land Management Plan, questioning the logic, the assumptions, the disregard for not simply the public input, but the disregard for the goals of the LMP and the County MSCP as well. It is said that there are at least 7 people in agreement for each person that actually responds to your requests to comment. Personally, I have spoken to well over a dozen whose reactions ranged from saddened, to discouraged to despair, that the government agencies on whom we depend to protect our interests have simply altogether disregarded them. I have hope that some of those may write to you to express those feelings. As I have spent somewhere on the order of 5 hours reviewing and researching information to provide this response, I suspect many will not. But they are there.

From the Land Management plan:

.... (LMP), the LMP team recommends to the Fish and Wildlife Commission that the Reserve be designated as an ER as defined in the Fish and Game Code (FGC), Section 1580-1587: 'land or land and water area that are designated by the Commission pursuant to section 1580 and that are to be preserved in a natural condition, or which are to be provided some level of protection as determined by the Commission, **for the benefit of the general public to observe native flora and fauna** and for scientific study or research.

the location of which provides **a large open space link between county preserve to the north and west**, as well as protection of the watershed upstream of the San Vicente Reservoir.

The mission of CDFW which evokes the managing of such diverse natural resources with **managed public access**, along with this LMP, will maintain this wonderful 'sense of place.'

Taken from your Land Management Plan, along with the directives of the County's MSCP, there is clear indication that the public should have reasonable and continuing access to the land their tax dollars and charitable dollars were used to obtain. The residents of the greater Ramona community (and San Diego County as well) have been waiting for nearly 10 years to have access to this land again. This is simply a slap in the face to the community that patiently waited for its government to act on behalf of the public.

Comments or topics provided and documented included, but were not limited to: • Desire for hiking and equestrian trails • Desire for dog training areas • Request for open hunting • Request for improved public access and entry road • Protection of cultural, archaeological, and natural resources • Protection of the wildlife and preserve areas.

Agency Response

8-B See above as well as response 6-A for information on trails.

8-C According to §630 of the CCR (Title 14 – Natural Resources) the Department must follow certain legal procedures for the allowance of public use/trails, such as completion of this LMP as well as CEQA processes.

8-D The SDG&E easement road that leads to the Southwest corner of the Reserve goes through Reservation land. The Barona Band of Mission Indians has expressed no interest in allowing any trail within their Reservation. In addition, this portion of the Reserve consists of mature native chaparral and boulder-strewn habitat. To create a trail through this section of the Reserve would require a large amount of habitat to be removed and is not within the CDFW mission.

Your own documentation cited the frequent, vocal, public input for trail access. Why did you completely disregard this vital part of the land management?

As such, these Public Use Elements addresses the appropriate and compatible wildlife-dependent public uses which include: • Hunting • Educational/Interpretive (includes Educational Events and Trails) • Scientific Research Other forms of public recreation, including camping, dog training and field trials, mountain biking, and off-highway vehicle use, are prohibited because of the potential negative impacts to wildlife, wildlife habitats, conflicts with other uses, and management demands [CCR, Title 14, § 630]. The Department recommends that the Reserve remain a closed zone (per approval by the Fish and Game Commission) with public access by permit or appropriate educational event, with the exception of the Luelf Pond OSP trail (see Trails below). CDFW may issue permit/access letter for appropriate outdoor education programs, hunting programs, and scientific study.

You offer no justification that any actual negative impact exists. Hiking, biking, and equestrian trails coexist all over the county with the local flora and fauna. Posturing that the potential for a negative impact is all the justification needed to keep this area closed is ludicrous, continuing to treat the members of the community as if they were little children unable to manage reasonable restrictions. There will ALWAYS be those who choose to desecrate the land. They will do so whether or not you close the land to the rest of the public. It is patently unfair to restrict public access for many based on the actions of a few – actions that are likely to occur no matter the amount of restriction.

Your own land management plan cites the existence of many miles of ranch roads, one that nearly connects to the Barnett Ranch trail, one that would extend a Barnett Ranch trail to Chuck wagon road, which then connects to the San Vicente Road Pathway. Those trail connections right there would create a loop trail that would run through Barnett Ranch, into CdSV, out on Chuckwagon and back down the pathway.

From Luelf Pond to the nearest adjacent ranch road – in seven years no one could figure out how to find 2000' feet of connector trail? I understand that some of the slopes are steep – that's why we have switchback trails. Figure it out. Make it work for the people who pay you.

Further, the Southwest backcountry corner has the potential for being the access point for the Trans-County trail connection, as it abuts land owned by the City of San Diego for the San Vicente Reservoir. If we cannot get our own government agencies to cooperate with one another for trail access, how can we expect private landowners to acquiesce to selling their land at fire sale prices to make these proposed long trails happen? You are supposed to be setting the example!

Agency Response

Prior to CDFW's ownership of the Reserve, the land was used mainly for cattle grazing, raising goats, farming, bee-keeping, and even a Bed and Breakfast, but the Reserve was never open to the public. As such, no public trails exist on the Reserve. **Authorized access of the Reserve was only as an invited guest of the previous land owner and, near the end of the last private ownership, three equestrian events (called i.e., Poker Ride) was allowed.** These rides were permitted as a way to help promote community and political support for development of the Reserve.

This is a spurious argument that fails to take in the historical context that 10-50 years ago, there were little or no "public" trails. Property owners allowed access to most everyone, fencing land more to keep cattle in than people out. Most every equestrian and local hiker that has lived in this area previous to the closing of the reserve by Fish and Wildlife remembers riding or hiking here, as there was generous access allowed by local landowners. The disappointment voiced by many when this management plan was announced almost unfailingly started with, "Oh, we were so expecting to be able to ride there again."

The existing conditions that follow, constrain the allowance of trails within some parts of the Reserve. The Reserve is land-locked on the west, east, and south by Native American Reservation land and/or private property. Because of this situation, trails would have no 'through-route' capability, only an 'out-and-back' trail which would cause an over-use of these specific areas. There is limited trail access into the Reserve via Chuckwagon Road, so allowing public access here would take trail users through the mitigation section and in close proximity to San Vicente Creek (which is known to have federally listed species). Public trails within the main portion of the Reserve would likely interfere with current and future research within the Reserve. In addition, there is limited CDFW staffing available to monitor and patrol the Reserve CDFW is exploring the potential for a public trail from San Diego County's Holly Oaks and the Luelf Pond trail through the northwestern corner of the Reserve at Southern Oak Road. Currently, a road exists between the connecting points that would provide public access to a scenic part of the Reserve while minimizing disturbance to other parts of the Reserve. Numerous efforts were made by CDFW and CSP staff to find a through trail from the Holly Oaks and Luelf Pond trail over to the Barnett Ranch Open Space Preserve, but no sustainable trail alignment could be found due to topography and the need for extensive vegetation removal to create a new through trail. In addition, a trail in this area would have to traverse the Daney Canyon Water Transfer (not owned by CDFW). However, CDFW staff will continue to look for a sustainable through trail from Holly Oaks and Luelf Pond trail to the Barnett Ranch Open Space Preserve.

Please see previous remarks about the already existing ranch roads and connecting trails. Please note that the use of +/- 10 miles of trails on the ranch comes to about 12 acres of the well over 4000 acres of preserve. That's public access using less than 3% of the total preserve area. Somehow, I think it is possible for the public to coexist, if the wildlife gets to keep 97% and the public gets to walk/ride/bike on the other 3%.

Organize hunts to target specific species and limit hunters by using a random drawing for each hunt. Hunters drawn for each hunt would be allowed to hunt the Reserve on a specified date and location determined by the Department. It is not anticipated that limited regulated hunting would unduly

Agency Response

8-E See response 6-A, above

interfere with the primary purpose for which the Reserve was acquired nor would hunting have an adverse impact on non-hunted species or their habitats due to the seasonality of hunting. 3. Provide appropriate signage and barriers to keep hunters outside of sensitive habitats and within the boundaries of designated hunting boundaries.

8-E

Most of the area designated for limited hunting requires use of the ranch roads to enter these areas. If it is permissible for hunters to not only use the roads, but to walk into the the designated habitat areas to hunt, how do you justify limiting the rest of the general public access to no access at all? There is no logic here.

This is an arrow in the heart of every San Diego County resident who loves the backcountry and loves **BEING in the backcountry. You express concern about over use, but keep trying to confine an ever growing population to ever smaller areas of open land. The best way to minimize the impact of 1000 steps is to spread them over 10,000 acres. Closing public access to public land is **NOT** the way to accomplish public appreciation for our local ecosystem. We beg you to reconsider.**

**Alison Farrin
Director 2015
Ramona Trails Association**

Agency Response

9-A See response 6-A for information on trails.

May 29, 2015

California State Parks - Southern Service Center
Cañada de San Vicente Land Management Planning Team
2797 Truxtun Road
San Diego, CA 92106

Re: Cañada de San Vicente Draft Land Management Plan

Dear Sirs:

I want to express my disappointment that your Draft Management Plan for Rancho Cañada de San Vicente (previously known as "Monte Vista Ranch") is so restrictive as to proposed public access and trails.

The draft management plan states:

"Circulation through the Reserve is on unpaved maintenance and fire roads, with no designated trailheads or trails".

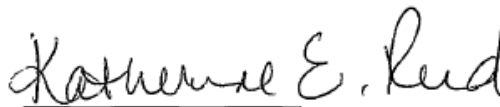
This is a rather odd assessment in my view, since the ranch is to my knowledge cross-hatched with dirt roads which are wide and graded. I was invited to ride on the ranch on several occasions and there are many roads, which at that time easily accommodated large groups of horseback riders, and there was also ample graded area for parking. These roads would work well for mixed use, allowing space for hikers, cyclists, and horseback riders to coexist.

This is not undisturbed virgin land. In fact your own report references several historic roads and trails across this property.

A representative from the California Department of Fish and Game was invited to address Ramona Trails Association a few years ago, at a meeting that I attended. Your representative was at that time very dismissive of the idea of allowing public access to this property. That attitude is very obviously borne out in your report, which is written to reinforce the position your agency had already taken regarding public access.

I sincerely urge you, a public agency, to reconsider and to encourage public trails on this public land.

Sincerely,


Katherine E. Reid

cc: California State Assembly Member Brian W. Jones
California State Senator Joel Anderson

9-A

Agency Response

10-A Thank you for your support and comment submittal.

10-B See response 4-B regarding signage.

10-C See response 5-B for information on funding sources and the reasons for which this property was acquired.

June 3, 2015

Dear Sirs,

I have read the Draft Land Management Plan and Initial Study/Mitigated Negative Declaration (IS/MND) for the Canada de San Vicente Ecological Reserve.

I was also at the meeting in Ramona in October 2013. From the description and photographs, the area appears to be extremely beautiful with many protected plants, animals, and Native American areas.

At your meeting in Ramona, Fish and Wildlife expressed interest in “what the public would like to see done with this property”. Many people attended and most, if not all stated they would like to see trails on this very large preserve. They also stated they would like to see hiking and equestrian trails that link to existing trails from Ramona and Lakeside.

I am very disappointed with the findings of Fish and Wildlife. With over 5,000 acres of this preserve, only a very small section in the north/west area will be possible for trails. Yet you plan to open this preserve up to hunters and hunting dogs. In my opinion, hunters and hunting dogs do much more damage to an area than equestrians riding or hikers that would stay on a designated trail.

I understand the need to preserve our back county and the delicate plants and animals. I also feel it is very important to the people and to the community to be able to get out into nature to appreciate all the beautiful things our diverse San Diego area has to offer.

Under “Facility Maintenance”, the report stated, “The Reserve is on unpaved maintenance and fire roads with no designated trailheads and trail”. Couldn’t those existing “unpaved maintenance and fire roads” be used as trails, with little to no impact on the environment and wildlife?

Your report also stated under “Range of Activities” there is verbiage about road and trail maintenance. What trails? I thought you stated there were no trails.

Also under activities, the “installation of signs and kiosks”. To whom are these sign and kiosks made for? The hunters or the hunting dogs? Since there are no trails, with no real plans to make trails, I can only imagine they must be for them.

Fish and Wildlife has had this property for many years so that proper documentation can be made for plants, animals, and possible Native American sites, etc.

It seems to me that Fish and Wildlife is in no hurry to open any part of this Reserve to any of the public.

Doesn’t your agency protect areas for the public? Don’t you use public funds? Then why are we being restricted from enjoying this Reserve?

Most, if not all, of this land was for ranching. Humans and stock animals have enjoyed it for generations. Please open this Preserve to the public so future generations can also enjoy this area.

Sincerely,

Karen Ensall,

President, San Diego Trails Alliance
President, Lakeside Frontier Riders
Lakeside Community Planning Group Member
Supervisor Dianne Jacob’s Trails Advisory Board

10-A

10-B

10-C

Agency Response

11-A See response 6-A for information on trails and public access.

11-B See response 6-A, paragraphs 2-4. Several compatible wildlife-dependent public uses are being allowed as outlined in LMP section 4.5 (Public Use Elements).

From: [Don Wendt](#)
To: Burg, Richard@Wildlife
Cc: Review, Environmental@Parks
Subject: Canada de San Vincente Ecological Reserve...draft mitigated negative declaration
Date: Thursday, June 04, 2015 11:06:39 PM

11-A

This document totally disregards the public input which California Fish and Wildlife asked for and received during public meetings and public comment. You of course know that the people of California want their public access to their publicly owned lands which are being denied under this management plan.

Many Ramona Trails Association members held community events, hiked, cycled and rode this property by invitation when it was privately held as the Monte Vista Ranch. We are well aware, from the testimony of former property managers, that in selling this property to the Conservancy and the State Of California the former owners intended to open Monte Vista Ranch to greater public use. Since California Fish and Wildlife took ownership, they have created a very unfriendly and non-cooperative atmosphere and totally denied the public's right to use their own public land.

11-B

A major part of the public experience of nature and wildlife is just being there to watch and observe. Many people choose to do this as part of their recreating by hiking, cycling and riding their horses to reduce any environmental impact. Canada de San Vincente is a key piece of property to foster connectivity of non-motorized trails per the San Diego County Trails master plan. Through the use of the many existing ranch roads, this State Owned property is centrally located for providing trail connections between Ramona, Lakeside and Poway, all on the Master Trail Plan for San Diego County. These same ranch roads are currently being used by your staff in motorized vehicles as they were when Monte Vista Ranch staff drove them on ranching business.

I encourage you to reconsider this plan and make public access a corner stone of the management as it is in your purpose statement.

--

Don Wendt, President
Ramona Trails Association

Agency Response

12-A See response 6-A for information on trails and public access.

12-B See response 6-A for information on trails and public access.

Comment Letter 12 – Cheryl Wegner

From: [Cheryl Wegner](#)
To: Review_Environmental@Parks
Cc: [Jacob, Dianne](#)
Subject: Canada de San Vicente
Date: Thursday, June 04, 2015 9:32:46 PM
Attachments: [Canada de San Vicente-letter to Planning Team.doc](#)

Dear Planning Team,

I want to express my concern about the Draft Management Plan for Canada de San Vicente.

12-A

The plan does not provide enough public access to a area that has been used as a working ranch, a Bed and Breakfast, and from personal experience, special trail events. I was a board member for Ramona Trails Association during a time when we held our annual multi-use trail events there at what was then known as Monte Vista Ranch.

The area is absolutely beautiful, with ranch roads accessing all corners of this property. We rode all of them many times. When it was a Bed and Breakfast quads were allowed to traverse the area. Though a wonderful place, full of varied habitats, it was far from pristine, having had cattle on it, a vineyard and mining.

12-B

I attended the Fish & Wildlife meeting in Ramona and found that almost all the folks there, whether equestrians, hunters, hikers, conservationists and mountain bikers, we all felt there should be public access, that we could all enjoy this land while preserving it for generations to come. Additionally, this land provides vital trail connections to other public lands, such as Barnett Ranch, the Trans County Trail, San Diego River Trail and Lakeside Community Trails. This has been on the approved Ramona Community Trails map for years.

Planning should reflect both conservation and passive recreation, as this land was intended when the family sold it, while respecting the will of the people served and the communities thereof.

Thank you,

Cheryl Wegner

Agency Response

13-A See responses 6-A and 11-B for information on trails and public access.

13-B See response 11-B, above

From: [Joseph Nunez](#)
To: [Pert, Ed@Wildlife](#); [FGC](#); [Review, Environmental@Parks](#)
Subject: Fw: Cañada de San Vicente classification
Date: Wednesday, June 03, 2015 9:36:12 PM

13-A

This writing represents my opinion concerning the designation of land in San Diego County known as Canada de San Vicente (CdSV). I completely agree with the views and statements held by Mr. Jack Bransford and those of Dr. Bob Smith.

The subject land belongs to the public citizenry and for the use by this citizenry to legal recreational activity. To designate this land as an Ecological Reserve (ER=Entrance Restricted) would be a crime and unlawful. Look at the 'Pitiful Results' at the hunting opportunities from Rancho Jamul Ecological Reserve (RJER) and one can correctly predict where CdSV will be in the near future under the ad ministry of CDFW. RJER is a very restrictive hunting policy with very meager results.

This designation of ER is no more then a movement to privatize America's public lands. Under the guise of : The Clean Air Act, Safe Drinking Water Act, Clean Water Act, Renewable Energy Act, etc. This is a whole sale conversion of the West's public lands. This anti-public lands movement was never about giving American citizens more land nor more access. This movement is about getting as much of the public's land into the hands of the best connected and well-heeled. In this 'high-stakes' game, no one openly admits their true intentions, governed by sleight-of-hand tactics and backed by big money, mostly from the Tax payer. Many of the Western States - New Mexico, Nevada, California, Colorado, Idaho, etc.- are selling off our public lands as if they owned them.

As we argue/discuss with each other concerning best-use-plans for these public lands these lands are simply disappearing, sold off using bogus justifications. With more people streaming into the 'West', public lands are becoming more scarce. We in California are currently experiencing a drought, but the rains will come and the land will repair yet the hunting, fishing, and outdoor recreationist will be unable to reap the benefits - they will be simply locked out of their lands.

13-B

**If the designation to this land is any way restrictive to use by the public for legal recreation, I would very much like to be notified with verifiable justification. I would please like to be placed on the mailing list for future correspondence on this land. Thank you
Joe Nunez**

Agency Response

14-A Comment Noted

14-B See response 11-B

14-C See response 14-A

14-D Nothing within this management plan excludes the use of MOUs, MOAs, or special use permits to facilitate collaboration with local entities. Section 4.5.1, Goal 1 – Task #7 states that CDFW will maintain relationships with hunters and volunteer organizations. Minor revisions will be made to page 4-45, Task #7.

Comment Letter 14 – Jack Bransford

From: [Dena or Jack :-\)](#)
To: [Pert. Ed@Wildlife Review, Environmental@Parks](#)
Subject: Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente (CSV) Ecological Reserve
Date: Friday, June 05, 2015 11:44:33 PM
Attachments: [image002.emz](#)
[image003.png](#)
[image006.emz](#)
[image007.png](#)
[CdSV LMP.doc](#)

Dear Sirs...,

14-A To whom it may concern: The purpose/intent of this email is to convey my questions, comments, and recommendations for inclusion in the processing of the subject draft plan. Accordingly, I hereby request that I be associated and identified with the comments/recommendation provided within the input submitted for the San Diego County Wildlife Federation (SDCWF) by R.R. Smith, since most of my related sentiments are included therein. A copy of that input is included with this correspondence, and is now annotated with a few interspaced, supplemental information/recommendations, that I have deemed to be beneficial to better insure the clarity of my related intent, etc.

14-B The letter, spirit, and intent of my 'input' – as is hereby provided, is based on the philosophy that: "The subject lands belong to the citizenry of California, AND therefore should almost always be routinely available to the public for appropriate recreational activity. The only allowable exception to that rule is when the proposed limitation/restriction of the public's right is legitimately based on the results of the analysis of verifiable scientific data, or on the results of safety based analysis, where after that information is memorialized and made available to the public for review". AND when it seems that an expected decision is unlikely to comport with that philosophy' -- then members of the public should advertise and advocate for the use of the California Public Records Act (CPRA), as is exemplified at <http://firstamendmentcoalition.org/public-records-2/sample-cpra-request-letter> -- so as to obtain the requisite information to formulate an informed decision regarding an appropriate course of remedial action, etc.

14-C I request, and hereby recommend that all 'inputs' submitted by members of the public in connection with the subject matter be made a part of the official record to insure they are available for viewing by ALL; which will facilitate the opportunity for the cross-fertilization of ideas to better prepare ALL for the subsequent processing of the subject LMP to increase the quality of the final plan. AND if a proffered recommendation is not to be incorporated, then an explanation should be memorialized in the final plan for the public's information/review. Additionally, I request/recommend that I be included on distribution for all future correspondence you may publish regarding the subject matter.

I initially deemed the DRAFT LMP to be well written, since it seemed to 'list' the requisite cardinal elemental characteristics I thought were appropriate for the plan. However, subsequently, after a careful review, combined with the results of a 'look-back' analysis of the related contextual history of the approximately 5600-acre Rancho Jamul Ecological Reserve (RJER), so as to better understand/anticipate the LIKELY pattern of the 'management oversight' planned for the CSV property. In short, as an added point of concern, I viewed the CDFW's proposed designation of the CSV property, as an Ecological Reserve, to be a 'signal of a serious premeditated intent' to repeat the pattern established at the RJER to institutionalize the same type of severe arbitrary restrictions on certain recreational activities, especially those related to sport-hunting. - I'M NOW VERY CONCERNED.

One has only to review the 'pitiful record' of the paltry hunting opportunities that have been allowed at the RJER property during the period of 1998 to the present time, all the while BEING under the administrative oversight of the CDFW's Region Five staff... to fully understand and appreciate the need and understand justified reaction, one has only to conduct a critical objective analysis of the aforementioned well-known history at RJER. common-sense-logic would mandate, or at least strongly suggest the need for a plan with 'italicized' goals/objectives to insure the likelihood that the public's right of access to enjoy the available recreational opportunities will be adequately described and provisioned in a timely manner -- especially as it relates to sport-hunting.

14-D Given the foregoing record..., I've since concluded that, at least IMHO, the draft plan, in its present state, simply lacks the requisite detailed specificity – that is called for to prevent a 'duplication' of the disastrous history' of the RJER from being repeated at the CSV property. One can only assume that if a repeat of that 'RECORD' is not intended as a major goal for the CDFW, then they should be agreeable to a 'modification' of the subject plan to include provisions to institutionalize the use of MOU's and/or MOA's to facilitate collaboration with 'local groups' (e.g., the SDCWF - <http://www.sdcwf.org/> - and/or its member organizations) to identify, develop and memorialize plans that can be monitored and managed. Special events on CSV lands that could involve "Wounded Warriors", family and/or youth events, could and should be planned and conducted with the proactive involvement of these same groups.

Accordingly, I'm hereby making a recommendation for the establishment of a MOU/MOA with the "SDCWF" and/or at least with several of the related member organizations, for a collaborative effort to plan and establish goals & objectives which must be memorialized & outlined in the format of a "Plan of Action & Milestones" (i.e., a POA&M) defining what needs to be done by whom, and the planned schedule for accomplishment, to measure/insure the appropriate 'progress' for accomplishment of the defined

Agency Response

14-E See response 14-A

14-F See responses to San Diego County Wildlife Federation/Robert Smith (letter #15), following

Comment Letter 14 – Jack Bransford

goals is on-track to make certain suitable recreational opportunities are made available to the public in a timely manner. This would provide the means to assure the achievement of agreed upon goals/objectives that would likely not otherwise be accomplished, or certainly not in a timely manner, due mainly to chronic resource short-falls on the part of CDFW. This approach would seem to be both reasonable and appropriate, unless of course, CDFW does not want that kind of assured success.; which of course would call for suitable explanation if that proves to be the case.

14-E In closing: I recommend that the requirement to provide for the proactive involvement of public groups in the planning for the subject LMP BE CLEARLY DOCUMENTED in the final approved LMP.

Respectfully submitted,

Jack Bransford

30 May, 2015

California State Parks - Southern Service Center
Cañada de San Vicente Land Management Planning Team
2797 Truxtun Road
San Diego, CA 92106

Dear Planning Team,

This letter represents the formal input of the San Diego County Wildlife Federation (SDCWF) regarding the Draft Land Management Plan (LMP) for Cañada de San Vicente (CdSV). SDCWF is a coalition of 20 outdoor recreational organizations within San Diego County, whose combined membership is about 12,000 individuals and families. Our primary impression of the document is that it is generally supportive of the recreational interests of our constituents. Given that, we have several recommendations, enumerated below, for improving the document to better reflect public uses that are consistent with both the conservation and habitat objectives for the property and with the stated objective to support consumptive conservation activities on the property. We have also included an editorial comment at the end of this letter.

14-F Hunting Program:

Probably the most significant issue is whether the property should be designated as an Ecological Reserve (ER) or as a Wildlife Area (WA). We are concerned that the recommended designation as an ER could lead to an unduly restrictive hunting policy, as we believe currently exists for the Rancho Jamul Ecological Reserve. However, we also recognize that having the property open to hunting without restrictions could have an unacceptable impact on the game species and result in game populations that are unsustainable. We must accept on faith that the hunting program described in the Draft LMP will indeed result in a robust hunting program both for youth and mobility-impaired and for the general public via a drawing process for permits. The wording in the Draft LMP regarding hunting for the general public is ambiguous (see Goal 1 on page 4-39). We propose that a specific task be added to Goal 1 stating "Develop a hunting program for the general public based upon a drawing process for permits. The number of permits issued each year will be adjusted to ensure that there is a sustainable population of the species being hunted". Without this task, the current language suggests that only youth and mobility-impaired hunting will be supported, with a possibility of "other" hunting.

Note: This is a matter that could benefit from the proactive participative involvement by selected public groups, as I explained in my foregoing comments – Jack B...

Hunting Dog Training:

Agency Response

Comment Letter 14 – Jack Bransford

SDCWF includes five hunting dog organizations. We strongly recommend that a hunting dog training area be included as a compatible public use for CdSV. We acknowledge that there are already two Wildlife Areas with designated hunting dog training areas in the South Coast Region, but there are two primary reasons that an additional training area on CdSV is essential:

many hunting dog trainers, including several in our member chapters, live in North County. It is very inconvenient to have to drive to Jamul or San Felipe Valley. I would venture to say the environmental impact of all that additional driving is worse than the environmental impact of having a training area at CdSV; and dogs are very "place-oriented". If trained at one site, they believe that their training applies only to that site. It is estimated that a dog must be taught the same command at 4-5 sites before they understand that the command applies everywhere. Thus multiple training areas are required to fully train a hunting dog.

We must take exception to the comment in the Draft LMP that "dog training and field trials ... are prohibited because of the potential negative impacts to wildlife, wildlife habitats, conflicts with other uses, and management demands" (page 4-38). We believe that the approach used in our local Wildlife Areas, in which hunting dog training is allowed only in "designated areas" would work equally well on CdSV. A training area of only 100-200 acres would be adequate, and would not have a significant impact on a property of 5,014 acres. Several steps could be taken to mitigate any potential impact:

the designated area could be on disturbed (formerly cultivated) land where native species are least likely to exist. The only requirement for a training area is that it be on relatively flat land with cover low enough to be able to keep your dog in view but high enough to plant training birds. Riparian, coastal sage, chaparral and woodland areas are specifically unsuitable for dog training; signs should be prominently posted listing the rules for use of the training area; SDCWF would be happy to publicize these rules within the local dog training community; there should be signage designating the boundaries of the training area. This has been used successfully at Honey Springs, and I personally have never seen an instance in which those signs were not obeyed; the training area should be placed as close as feasible to an entrance to the property, with a sign on the access road indicating "No dog training beyond this sign". This will minimize the vehicular traffic on the property; and the proposed training area should be surveyed in advance to ensure that no listed species are located in the area.

By implementing these suggestions, we believe that a hunting dog training area would have no significant impacts.

Note: This is another example of where collaborative arrangement (i.e., MOU/MOA), etc. with selected groups to insure for the timely establishment of a better arrangement resulting from their expertise and available resources.

Volunteer Organizations:

Note: The exploitation of the wide-range of expertise and accompanying 'resources' would do much to insure that the public's needs are satisfied in a timely manner for all of the following matters.

We believe volunteer organizations can provide direct support for the goals for the Biological Element of the LMP (Para. 4.4.5, page 4-24). The Draft LMP does mention coordination with volunteers on two occasions, but more emphasis should be placed on the opportunities that volunteer organizations provide to implement the LMP. SDCWF includes many member organizations which perform conservation projects, and this expertise and support would be very useful in fulfilling the goals for CdSV. Some examples are:

San Diego Chapter of Quail Forever conducts monthly projects, mostly for repair of wildlife guzzlers, and they would be very helpful in repairing the guzzlers on CdSV;
San Diego Chapter of SCI provides funding for the development of local water sources for wildlife, and could provide funding and labor to improve seeps, streams and wells to provide a reliable water source for wildlife on CdSV;
San Diego County Varmint Callers conducts periodic work projects to improve habitat for wildlife, including several projects on the San Felipe Valley Wildlife Area;
San Diego Chapter of National Wild Turkey Federation has provided funding to repair an irrigation system on Hollenbeck Canyon Wildlife Area. They were instrumental in the introduction of turkeys into San Diego County and have experts who conduct turkey surveys throughout the County; they could expand those surveys to include CdSV; and
San Diego Chapter of Quail Forever conducts annual road surveys on Valley and Mountain Quail populations using members who are expert quail callers. These surveys are conducted with specific written protocols and could be expanded to do surveys on CdSV along routes approved by the Reserve Manager.

We propose that the Reserve Manager make optimal use of these resources. We also suggest that a Citizen Scientist approach be used, in which the Reserve Manager or his/her designee defines the goals and protocols for volunteer participation, provides the instruction necessary to ensure that the activities of the volunteers are consistent with the objectives of CdSV, and provides oversight to ensure that the volunteers are performing as instructed. If desired, SDCWF (or I am sure many of our member organizations) would be happy to work under the auspices of a Memorandum of Agreement with DFW.

It is not necessary to list the above or any other organizations in the LMP, but the LMP should acknowledge the positive role that volunteer organizations can make in meeting the objectives of CdSV and should list specific examples where volunteer support could be useful (restoring water sources, conducting wildlife surveys, removing interior fencing, etc.).

Editorial Comment:

It appears that the compass orientations shown in Figures 1, 3 and 7 are wrong. The legend shows the top of the pages being North, but I believe they are actually East.

Respectfully,

Robert R. Smith
President, San Diego County Wildlife Federation

Agency Response

15-A See response 11-B

15-B The requested language adjustment already exists within LMP Section 4.5.1 (Hunting Element), Goal 1 - Task 4 (sustainability) and Impact Guidelines #2 (random drawing). Minor revisions will be made to Task #1. See also response 11-B.

30 May, 2015



California State Parks - Southern Service Center
Cañada de San Vicente Land Management Planning Team
2797 Truxtun Road
San Diego, CA 92106

Dear Planning Team,

This letter represents the formal input of the San Diego County Wildlife Federation (SDCWF) regarding the Draft Land Management Plan (LMP) for Cañada de San Vicente (CdSV). SDCWF is a coalition of 20 outdoor recreational organizations within San Diego County, whose combined membership is about 12,000 individuals and families. Our primary impression of the document is that it is generally supportive of the recreational interests of our constituents. Given that, we have several recommendations, enumerated below, for improving the document to better reflect public uses that are consistent with both the conservation and habitat objectives for the property and with the stated objective to support consumptive conservation activities on the property. We have also included an editorial comment at the end of this letter.

Hunting Program:

15-A

Probably the most significant issue is whether the property should be designated as an Ecological Reserve (ER) or as a Wildlife Area (WA). We are concerned that the recommended designation as an ER could lead to an unduly restrictive hunting policy, as we believe currently exists for the Rancho Jamul Ecological Reserve. However, we also recognize that having the property open to hunting without restrictions could have an unacceptable impact on the game species and result in game populations that are unsustainable. We must accept on faith that the hunting program described in the Draft LMP will indeed result in a robust hunting program both for youth and mobility-impaired and for the general public via a drawing process for permits. The wording in the Draft LMP regarding hunting for the general public is ambiguous (see Goal 1 on page 4-39). We propose that a specific task be added to Goal 1 stating "Develop a hunting program for the general public based upon a drawing process for permits. The number of permits issued each year will be adjusted to ensure that there is a sustainable population of the species being hunted". Without this task, the current language suggests that only youth and mobility-impaired hunting will be supported, with a possibility of "other" hunting.

15-B

Agency Response

15-C Because the Reserve is located near large populations, has limited staffing, and operates with budgetary challenges, it is believed that opening the Reserve to public access in addition to those activities covered in LMP section 4.5 (Public Use Elements) would have a detrimental effect to the wildlife and habitat/vegetation on the Reserve. See also response 6-A, paragraphs 2-5.

15-D See response 14-D

Hunting Dog Training:

15-C

SDCWF includes five hunting dog organizations. We strongly recommend that a hunting dog training area be included as a compatible public use for CdSV. We acknowledge that there are already two Wildlife Areas with designated hunting dog training areas in the South Coast Region, but there are two primary reasons that an additional training area on CdSV is essential:

many hunting dog trainers, including several in our member chapters, live in North County. It is very inconvenient to have to drive to Jamul or San Felipe Valley. I would venture to say the environmental impact of all that additional driving is worse than the environmental impact of having a training area at CdSV; and

dogs are very “place-oriented”. If trained at one site, they believe that their training applies only to that site. It is estimated that a dog must be taught the same command at 4-5 sites before they understand that the command applies everywhere. Thus multiple training areas are required to fully train a hunting dog.

We must take exception to the comment in the Draft LMP that “dog training and field trials ... are prohibited because of the potential negative impacts to wildlife, wildlife habitats, conflicts with other uses, and management demands” (page 4-38). We believe that the approach used in our local Wildlife Areas, in which hunting dog training is allowed only in “designated areas” would work equally well on CdSV. A training area of only 100-200 acres would be adequate, and would not have a significant impact on a property of 5,014 acres. Several steps could be taken to mitigate any potential impact:

the designated area could be on disturbed (formerly cultivated) land where native species are least likely to exist. The only requirement for a training area is that it be on relatively flat land with cover low enough to be able to keep your dog in view but high enough to plant training birds. Riparian, coastal sage, chaparral and woodland areas are specifically unsuitable for dog training;

signs should be prominently posted listing the rules for use of the training area; SDCWF would be happy to publicize these rules within the local dog training community;

there should be signage designating the boundaries of the training area. This has been used successfully at Honey Springs, and I personally have never seen an instance in which those signs were not obeyed;

the training area should be placed as close as feasible to an entrance to the property, with a sign on the access road indicating “No dog training beyond this sign”. This will minimize the vehicular traffic on the property; and

the proposed training area should be surveyed in advance to ensure that no listed species are located in the area.

By implementing these suggestions, we believe that a hunting dog training area would have no significant impacts.

Volunteer Organizations:

15-D

We believe volunteer organizations can provide direct support for the goals for the Biological Element of the LMP (Para. 4.4.5, page 4-24). The Draft LMP does mention coordination with

Agency Response

15-E See response 14-D

15-F Thank you for catching the error. Minor revisions will be made to the maps and compass orientation for all figures.

15-D
Cont'd.

volunteers on two occasions, but more emphasis should be placed on the opportunities that volunteer organizations provide to implement the LMP. SDCWF includes many member organizations which perform conservation projects, and this expertise and support would be very useful in fulfilling the goals for CdSV. Some examples are:

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San Diego Chapter of SCI provides funding for the development of local water sources for wildlife, and could provide funding and labor to improve seeps, streams and wells to provide a reliable water source for wildlife on CdSV;

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San Diego Chapter of National Wild Turkey Federation has provided funding to repair an irrigation system on Hollenbeck Canyon Wildlife Area. They were instrumental in the introduction of turkeys into San Diego County and have experts who conduct turkey surveys throughout the County; they could expand those surveys to include CdSV; and

San Diego Chapter of Quail Forever conducts annual road surveys on Valley and Mountain Quail populations using members who are expert quail callers. These surveys are conducted with specific written protocols and could be expanded to do surveys on CdSV along routes approved by the Reserve Manager.

15-E

We propose that the Reserve Manager make optimal use of these resources. We also suggest that a Citizen Scientist approach be used, in which the Reserve Manager or his/her designee defines the goals and protocols for volunteer participation, provides the instruction necessary to ensure that the activities of the volunteers are consistent with the objectives of CdSV, and provides oversight to ensure that the volunteers are performing as instructed. If desired, SDCWF (or I am sure many of our member organizations) would be happy to work under the auspices of a Memorandum of Agreement with DFW.

It is not necessary to list the above or any other organizations in the LMP, but the LMP should acknowledge the positive role that volunteer organizations can make in meeting the objectives of CdSV and should list specific examples where volunteer support could be useful (restoring water sources, conducting wildlife surveys, removing interior fencing, etc.).

Editorial Comment:

15-F

It appears that the compass orientations shown in Figures 1, 3 and 7 are wrong. The legend shows the top of the pages being North, but I believe they are actually East.

Respectfully,

Robert R. Smith
President, San Diego County Wildlife Federation

Agency Response

16-A See response 14-A



RECEIVED

Lorna Cobb

JUN 08 2015

COUNTY SERVICE CENTER

Proposed usage of this land

Lorna Cobb

Draft

Wed, Jun 3, 2015 at 4:25 PM

Dear Planning Team,

I respectfully request that the letter of formal input submitted by Robert Smith of the San Diego County Wildlife Federation be looked at carefully and implemented. I can not add anything to his suggestions and concur 100% with the SDCWF. I have enclosed a copy of his 30 May 2015 for your review.

Thank you for your time in this very important matter.


Gene Cobb

16-A

Agency Response

- 17-A** §630 (a)4 of the CCR (Title 14 - Natural Resources) prohibits the use of bicycles except on designated access roads and parking areas. There are no designated access roads or parking lots within the Reserve. See also response 6-A, paragraphs 2-4.

From: [Ben Stone](#)
To: Review.Environmental@Parks
Subject: Comments in Reference to Canada de San vicente
Date: Friday, June 05, 2015 12:41:11 PM
Attachments: [SDMBA - Canada de San Vicente Preserve Map.pdf](#)

Please accept our comments in reference to Canada de San Vicente,

17-A

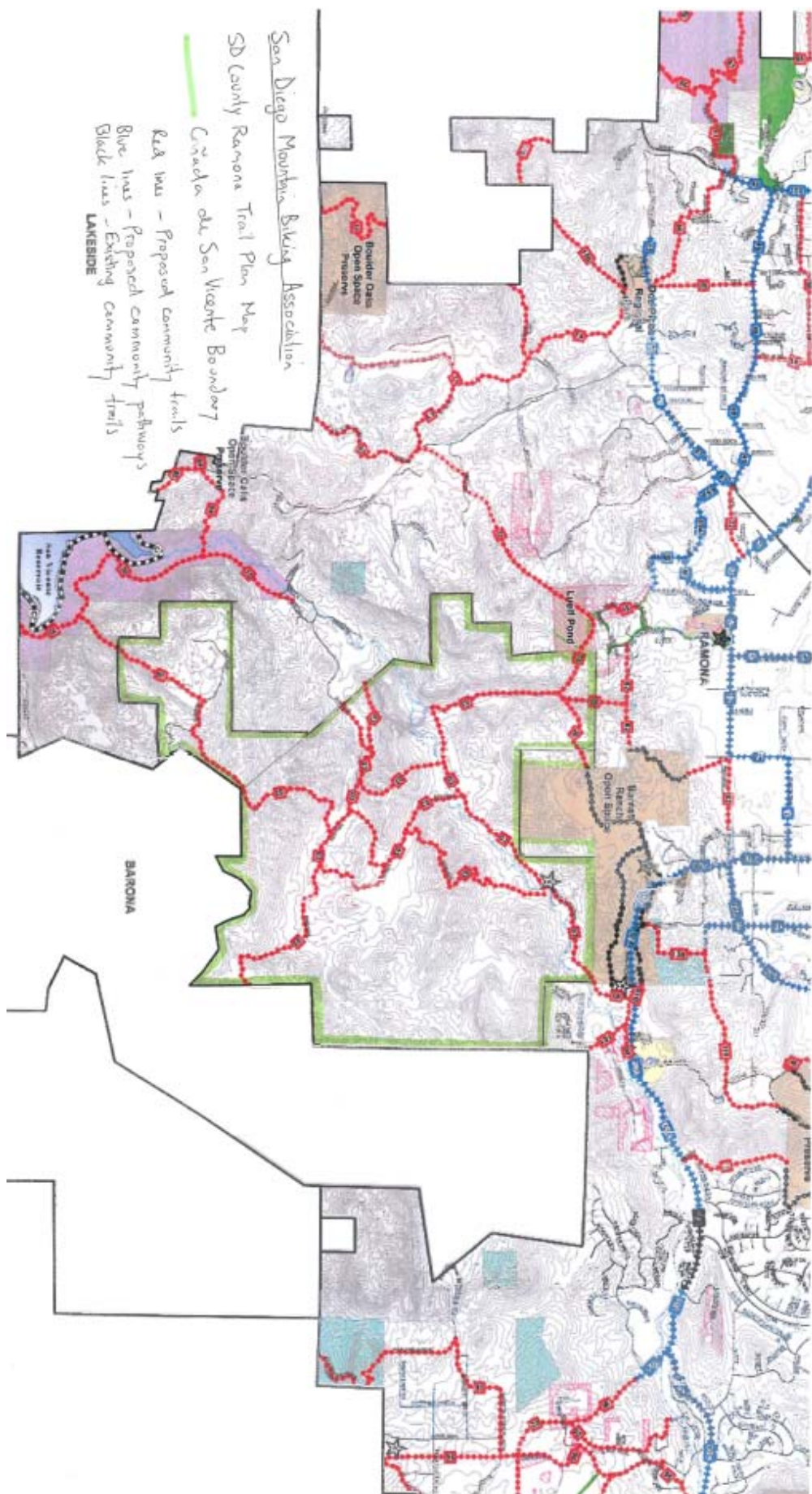
We believe there are vital connections to current communities on the ground that are only feasible through this property. We have attached a map of recommended connections and trails, much of it utilizing current fire roads on the ground within the park. We believe allowing access through this park in a legal manner would encourage legal access and decrease the risk of illegal access. Further with the bordering regions and your admitted inability to regularly patrol this property legal access can provide the needed Stewardship of the land to protect the natural resources onsite. We have seen that properties where fences go up and access is blocked off-road mechanized vehicle use increases, illegal dumping, and other damaging effects increase in the area.

Also your plan sites that Mountain Bikes will not be allowed within the Park and we are asking what the scientific bases for this is, as in similar areas pedestrians and horses will be allowed according to your plan. Further as hunting will be allowed within the park and there is a greater chance of hunters going off trail that Mountain Bikers would not even be allowed on, we would like to see the study that identifies Mountain Biking as having a greater impact on the environment than trail users who are assumed to go off trail.

Further we believe not allowing access and needed connections on this property will increase the likelihood of illegal access, illegal trails and degradation to the environment and sensitive habitat.

Ben M Stone
SDMBA Board

Agency Response



Agency Response

18-A See responses 6-A, 15-C, and 17-A

18-B See responses 6-A and 11-B

18-C See response 14-A



County of San Diego

BRIAN ALBRIGHT
DIRECTOR
(858) 966-1301

DEPARTMENT OF PARKS AND RECREATION
5500 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123
Administrative Office (858) 694-3030
www.sdparks.org

June 10, 2015

Mike Yengling, Environmental Coordinator
California Department of Parks & Recreation
Southern Service Center
2797 Truxtun Road, Barracks 26
San Diego, CA 92106

Email: Environmental.Review@parks.ca.gov

COMMENTS ON THE CAÑADA DE SAN VICENTE ECOLOGICAL RESERVE LAND MANAGEMENT PLAN AND MITIGATED NEGATIVE DECLARATION DATED MAY 4, 2015

The County of San Diego Department of Parks and Recreation (DPR) has received and reviewed the Mitigated Negative Declaration (MND) for the Cañada De San Vicente Ecological Reserve Land Management Plan (LMP) dated May 4, 2015. The County has the following comments on the MND and LMP:

General Comments:

- 18-A 1. 4.5 Public Use Elements: The Hunting, Education, and Scientific Research uses seem restrictive considering the historic uses of the property and in the context of community needs. The Multiple Species Conservation Program (MSCP) lists a number of recreational uses that are compatible with wildlife-dependent lands, including trails.
- 18-B 2. 4.5 Public Use Elements: Recommendation that the Reserve remain a closed zone should be reviewed in light of providing regulated public use with no demonstrated impacts to the resource or habitat.
- 18-C 3. 4.5 Public Use Elements: DPR appreciates the opportunity to continue an open dialogue regarding trail use between the County preserves at Barnette Ranch, Luelf Pond, and Holly Oaks.
- 4. Limited Hunting Zone 4.5.1: Recommend language in the tasks referencing coordination with County DPR regarding hunting events.
- 5. Trails 4.5.4: Under tasks, recommend initiating an agreement or Memorandum of Understanding (MOU) clarifying trail alignments, use, operations, security and responsibilities.

Agency Response

18-D See response 6-A

18-E See response 6-A and 8-D

18-F See response 6-A

18-G See response 14-A

18-H See response 16-A and 6-A

18-C
Cont'd

6. Fire and Fire Management 4.6.6: Recommend that public activities be cancelled if a Red Flag Warning is issue by National Oceanic and Atmospheric Administration (NOAA).
7. Fire and Fire Management 4.6.6: Recommend listing evacuation routes in the LMP due to proximity to housing developments.

Trails Comments:

18-D

8. As noted from the public scoping meeting October 29, 2013, one of the major community desires for the Reserve is "hiking and equestrian trails". The LMP does not provide a public trails system even though this is highly desired by the community. The County requests the LMP be amended to consider the adopted Ramona Community Trails and Pathways Plan found within the County Trails Master Plan (map attached).

18-E

9. The County requests the LMP to provide the following vital trail connections between Lakeside and Ramona communities:
 - a. Connection from Ramona to the Trans County Regional Trail and San Diego River Regional Trail both through Lakeside;
 - b. Connection from Lakeside to the Coast to Crest Regional Trail through Ramona; and
 - c. Potential to provide an important alternative alignment for the Trans County Trail.

18-F

10. The existing ranch roads shown on maps for Cañada de San Vicente correspond directly with the proposed trails on the adopted Ramona Community Trails and Pathways Plan. These existing roads could be incorporated into a trails plan for the Reserve for public use. They could provide opportunities for trail loops. These existing facilities would not encourage the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. If realignments are necessary to avoid sensitive areas, the County would welcome the opportunity to work with CFW to develop a functional public trail system.

18-G

11. The LMP statement that there are no "public trails" on the Reserve is misleading. Although the property was private and the trails were not public, as noted in section 4.5.4 Trails, trail events were held using the existing ranch roads as the trail system. The County requests these ranch roads, identified as maintenance and fire roads in the LMP, be reviewed so they can also serve as the public trail system.

18-H

12. The environmental document "Public Use Elements" will only provide limited and regulated public uses. The main public use will be hunting. Education/interpretation and scientific research are the only other regulated public use. "The Reserve will provide wildlife-dependent recreational activities such as nature viewing. Although public uses of the property will be limited and regulated, possible routes for a multi-use trail, near the northern boundary of the reserve are being explored. This connector trail would link to existing trails

Agency Response

18-I See response 14-A

18-I

on adjacent County open space land." This is the only opportunity for a proposed trail mentioned in the LMP. This trail would provide a connection from Holly Oaks Preserve to Southern Oak Road. The alignment is an existing dirt access road that provides a connection back to a paved residential street. The LMP also mentions it will continue research for a through trail alignment from Holly Oaks Preserve to Barnett Ranch Preserve through GIS analysis and field reconnaissance. The County supports and would be happy to assist in this endeavor.

The County appreciates the opportunity to participate in the environmental review process for this project. We look forward to receiving any future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Marcus Lubich at (858) 966-1348 or email at marcus.lubich@sdcounty.ca.gov.

Sincerely,



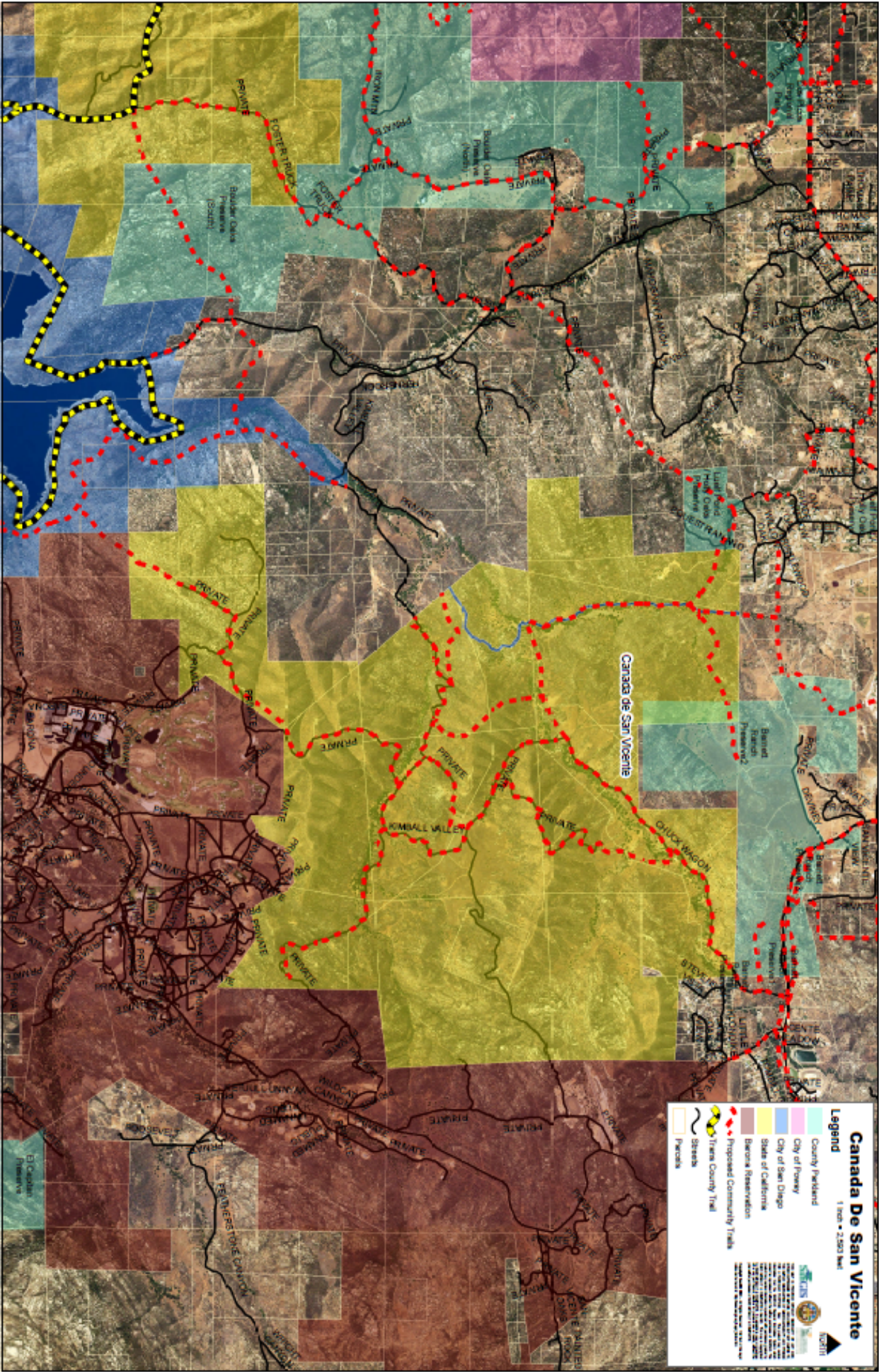
Jill Bankston, Chief Development Division
Department of Parks and Recreation

Attachment: County Trails Master Plan Map

cc's (via email):

Adam Wilson, District 2 Policy Advisor
Conor McGee, CAO Staff Officer, DCAO
Christine Sloan, Resource Management Division Chief, County DPR
Dave Knopp, Operations Chief Northern Division, County DPR
Cheryl Goddard, Program Manager, County DPR
Maryanne Vancio, County Trails Program Coordinator, County DPR
Bill Saumier, District Manager, DPR
Lorrie Bradley, Land Use and Environmental Planner, County DPR
Peter Eichar, Land Use and Environmental Planner, County PDS

Agency Response



Agency Response

19-A The reference to appendix 8.3 on page 4-29 as anything other than a list of special status plant species and vegetation communities and their status was in error and the reference to it on page 4-29 is being removed. In addition, paragraph 2 on page 4-29 will be deleted. This program is no longer in use by the Department.

20-A See following comments

Comment Letter 19-20 – Ron Rempel

From: [RON](#)
To: [Review, Environmental@Parks](#); [Le Blanc, Teresa@Wildlife](#)
Cc: [Pert, Ed@Wildlife](#); [Loft, Eric@Wildlife](#)
Subject: RE: Notice of Availability - Draft Land Management Plan and Mitigated Negative Declaration for the Cañada de San Vicente Ecological Reserve
Date: Thursday, May 21, 2015 3:25:45 PM

19-A

Teresa and Terri- draft mgt plan says "A list of of data, mapping and assessment resources, both internal and external to CDFW, appears in Appendix 8.3. Appendix 8.3 is a list of species from CNDD and CNPS. It appears that the information that important to section 4.4.6 is missing from the document. Could you please provide it to me and others reviewing the document.

From: [RON](#)
To: [Review, Environmental@Parks](#); [Pert, Ed@Wildlife](#); [Burq, Richard@Wildlife](#); [Morey, Sandra@Wildlife](#); [Yparraquierre, Dan@Wildlife](#); [Loft, Eric@Wildlife](#)
Cc: [jerre](#); [Michael Beck](#); [Susan Wynn](#); [larry purcell](#); [jfooster@sdcw.org](#)
Subject: Comments on CSV dLMP/dMND
Date: Sunday, June 07, 2015 10:54:03 AM
Attachments: [CSV mgt plan comments.pdf](#)
[DFW findngs SDCWA 2835.pdf](#)

20-A

As requested on Friday by Ed Pert, Regional Manager, South Coast Region, attached are comments on the dLMP/dMND for Canada de San Vicente. Ed received a slightly different version of comments last week. The dLMP/dMND is lacking in data, analysis of impacts to species, fails to address covered species in various plans and agreements, fails to address impacts to regionally important species, fails to include adaptive management and in general reads like a recreation use plan. It failed to utilize or even disclose critical data that has been collected by DFW and others The plan will result in significant unmitigated impacts to species and habitats and the take of listed species. It does not meet the requirements of the SDCWA NCCP and could result it SDCWA's permit being suspended/revoked and associated potential legal actions. As such, a negative declaration is not the appropriate CEQA document.

Sincerely

Ron Rempel

20-B See response 19-A, above

20-C The LMP was developed based on all currently available information (biological and otherwise) collected over the years. This includes but is not limited to arroyo toad presence/absence surveys (2008, 2009, 2010, 2012, 2014, 2015), habitat stream survey 2012, small mammal trapping (2008 & 2013), bat surveys (2009 & 2015), Quino checkerspot butterfly observations (2009-2010), reptile/amphibian observations (2007-2015) and vegetation surveys (2009-10) conducted by the CDFW, The Nature conservancy (2004 -2006), private consultants (Merkel & Associates 1999 and 2004), EDAW environmental consulting, The San Diego Natural History Museum and other researchers including staff from the USGS (golden eagle /American badger surveys) and UC Davis (mountain lion). Significance thresholds are identified in the MND. The LMP has within chapters 2- 4 numerous guidance measures to avoid impacts such as but not limited to buffer zones, avoidance of work within bird nesting season, and avoidance of work within specific locations etc.

20-D The commenter does not specify what critical information is lacking. The LMP was developed based on all currently available information (biological and otherwise) collected over the years. This includes surveys conducted by the CDFW, private consultants, and other researchers including staff from the USGS and UC Davis. The commenter does not mention what contractual constraints are not identified. Goals and tasks are identified in Section 4 and 5 of the LMP.

June 5, 2015

To: Mr. Ed Pert

From: Ron Rempel

Subject: Canada de San Vicente Draft Land Management Plan/Mitigate Negative Declaration

20-B I intended to get these comments to you sooner but I was awaiting the missing part of the document. I was informed yesterday that rather than providing the missing appendix, the reference to it will be deleted from the final LMP. That is somewhat problematic since it was relied on to show the resources available to assist with monitoring and the Mitigated Negative Declaration claims that monitoring efforts are the major avoidance and minimization measures in the negative declaration. While that is questionable, it is also unclear where DFW will get the resources to do the identified monitoring.

20-C The Canada de San Vicente dLMP/dMNG appears to be an attempt to approve a management plan for the properties without actually addressing or evaluation the actual impacts at this time, but rather deferring them until a specific proposal is made but then tiring future action to the the dMNG so as to avoid an actual evaluation of the impacts to species, habitats and ecosystem processes. The documents do not include the biological information needed to make any assessment of impacts now or in the future. In addition, it doesn't even establish thresholds of significance that will be used in subsequent documents to determine if a project is consistent with dMND or if an EIR would need to be prepared. DFW has a long history in San Diego of approving LMPs utilizing a negative declaration and then implementing any project that mentions some activity in the ND without any analysis of the actual project specific impacts. Two examples are the riparian restoration along Jamul Creek that resulted in dewatering of the creek and the approval of a livestock grazing lease without any pre-project surveys for listed species. The livestock grazing lease did not include any objective standards for the project other than a residual dry matter (RDM) target. RDM level objectives are too crude to be utilized for evaluating wildlife cover needs and herbaceous species composition that are critical to many wildlife species. This appears to be the same approach that will be used at CSV.

20-D The Canada de San Vicente Draft Land Management Plan and Mitigate Negative Declaration (dLMP/dMNG) lacks critical information needed by the public to assess the appropriateness and the efficacy of the dLMP/dMNG as a management plan for the Canada de San Vicente (CSV) property. It fails to identify the contractual constraints regarding its management and the DFW obligations in regards to goals, objectives, actions, monitoring, adaptive management and public use. It's unclear if the team preparing the dLMP/dMNG was aware of the DFW's large set of obligations

- 20-E** The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. As stated in the Plan, the CDFW, to the extent practical, will follow San Diego Management and Monitoring Program (SDMMP) guidelines for monitoring efforts to provide unified and cohesive data sets to determine effectiveness of adaptive management actions.

Responses below (20-F – 20-H) refer to comment letter sections on the following pages

- 20-F** The commentator does not specify what “NG” stands for and thus unable to answer this comment.

- 20-G** There has been human use of CSV going back into the archaeological records. From at least 1846 until 1998, the various owners of the property raised horses and livestock (cattle, horses, sheep, and goats). In addition, the various owners also conducted agriculture operations (grapes and alfalfa) and operated apiaries. Copper was mined on the property from 1885-1930. In 2003 the residential cabins were restored and operated as the Rancho Canada Bed and Breakfast.

According to §630 of the CCR Title 14 Natural Resources “Ecological Reserves are established to provide protection for rare, threatened, or endangered native plants, wildlife, aquatic organism and specialized terrestrial or aquatic habitat types. Public entry and use of ecological reserves shall be compatible with primary purpose of such reserves”.

Because the Reserve is located near large populations, has limited staffing, and operates with budgetary challenges, it is believed that opening the Reserve to unregulated public access would have a detrimental effect to the wildlife and habitat/vegetation on the Reserve. As stated in the Plan, the Department has recommended that the Reserve remain a closed zone (per approval by the Fish and Game Commission) with public access by permit or appropriate educational event. With the exception to a connector trail from Holly Oaks Park and Luelf Pond OSP to Southern Oak Road there are no additional trails being proposed within Cañada de San Vicente Ecological Reserve.

The CDFW proposes to research and where feasible, provide additional hunts through the Upland Game Bird Heritage Program or other programs. These hunts would be limited in scope, seasonality, and participation levels.

- 20-H** See response 6-A. With the exception of a connector trail from Holly Oaks Park and Luelf Pond OSP to Southern Oak Road there are no additional trails being proposed within Cañada de San Vicente Ecological Reserve.

for CSV properties or if they were intentionally left them out of the documents and the planning (scoping process). The attached comments detail many of the applicable excerpts from various permits, plans and implementing agreements are to be considered as part of this comment letter. Please provide the specifics of how DFW determined that each was met with a reference to the specific page and section of the documents that demonstrate its being met, not just a generalized statement that it is being met.

If DFW approves the dLMP/dMND (prepared at a cost in excess of one quarter million dollars- \$250,000), it puts at risk multiple state and federal permits to multiple entities, violates DFW contracts with various organizations (including implementing agreements) and would likely result in:

- unauthorized take of state- and federally- listed species
- impacts to/take of MSCP covered species not addressed in the Multiple Species Conservation Program plan (MSCP)
- impacts to/take of San Diego County Water Authority (SDCWA) NCCP covered species
- adverse impacts to DFW species of special concern.

See the MSCP (including the IA) and the SDCWA NCCP (including the IA and the DFW permit) for specific details of the DFW and HMP land managers pursuant to these documents. A much more applicable LMP could have been developed with less cost had DFW taken off their insular cloak and worked with other organizations in its preparation. Based on the available information, it appears the the dLMP was never reviewed by FWS and DFW's conservation program (DFW's document release pursuant to the California Records Act does not include any documents indication such review although it does document review by the regional lands program) before it was released for public review. The members of these organizations have extensive experience assisting in the preparation of LMPs for MSCP preserve system lands and their review could have avoided some of the significant problems with the dLMP. The dLMP suffers from the same short comings in local jurisdiction management plans that DFW and FWS have been very critical of over the past several years- i.e. too much recreation use and too little adaptive management.

The dLMP/dMNG is far below quality of the plans prepared by the City of San Diego, County of San Diego and NGO's for the NCCP preserve lands they manage. Please the rationale of why DFW's (public trust agency) LMPs do not have to meet the standards of other NCCP preserve LMPs. The LMP also does not identify how the all the monitoring data/land management information associated with CSV will be made available to the public as required by the NCCPA for lands associate with the SDCWA NCCP. This must be included and a short time frame should be specified between its collection/development and its availability to the public.

Agency Response

- 20-I** The Plan states to build brush piles to benefit game and nongame species. These brush piles will be built using guidelines identified by the U.S Army Corps of Engineers Wildlife Resources Management Manual.
- 20-J** To date, the CDFW has not conducted any riparian planting within the Reserve and the only restoration work conducted has been the elimination of non-native/invasive plants, non-native wildlife, and trash removal. Section 4.4.1 (Habitat Management) makes no mention of any riparian plantings. Goal 2 on page 4-9 states “Maintain and enhance riparian vegetation communities in order to help sustain populations of special-status species that rely on the habitat for foraging, breeding, and roosting.” In addition, Section 4.4.2 states numerous “Goals” and “Tasks” protecting and enhancing arroyo toad habitat.
- 20-K** Various “Goals” and “Tasks” in Section 4.6.6 (Fire and Fire Management) are included in the LMP requiring the use of sound science in vegetation management regimes. Goal 1 Task 2 states “Form cooperative partnerships with state and federal agencies, and research institutions/organizations to develop scientifically sound objectives and methodology for prescribed burning.” Goal 2 states “Manage for fire cycles and fire management actions that promote healthy ecological systems supportive of native biota.” and Goal 2 Task 1 states “Pursue a greater understanding of the relationship between wildfire, prescribed fire, fire suppression, fire control, and the ecological systems of the region. Recognize the role of fire in maintaining ecological balance, processes, and biodiversity in all fire management policies. In addition, Table N: page 4-54 General Techniques Guidelines (Prescribed burns) requires site - specific plans that must comply with air quality, ESA/CESA, and CEQA requirements prior to implementing such action.
- 20-L** Non-native plants will be controlled where they threaten to reduce the quality of habitat for wildlife species or where they pose a competitive threat to important native plant communities. In general, control rather than eradication will be the goal. Eradication will only be the goal for incipient infestations of highly-invasive species.
- Non-native plant species will be controlled using an integrated approach that relies on both non-chemical and chemical (i.e. herbicide) use strategies. The risk that herbicides pose to non-target organisms is a dependent on both exposure and toxicity. This relationship between risk, exposure and toxicity can be assessed using the Hazard Quotient (HQ) method employed by numerous public agencies including the U.S. Environmental Protection Agency and the U.S. Forest Service. http://www.fs.fed.us/foresthealth/pesticide/pdfs/PrepEnvirmentalDoc_11-2014.pdf. With this method, no significant risk to non-target species would be expected when the calculated HQ is below a pre-determined Level of Concern (LOC). To reduce the risk posed to wildlife species at the Reserve, no herbicide will be used unless its calculated HQ value is below the LOC for the appropriate exposure scenario.
- Additionally, the risk to non-target wildlife and special-status plant species will be reduced by making low-volume, spot-treatments using hand-held equipment targeted specifically at non-native plants. Broadcast applications will be uncommon. Other risk-reduction strategies that may be used include using buffer zones, shields, tarps or other physical barriers to protect non-target plants, using selective rather than non-selective herbicides, and timing herbicide applications so that they are made when non-target species are in less-susceptible life stages (i.e. dormancy).
- 20-M** See response 20-E

The dLMP/dMNG must be completely revised and re-circulated for public review. In addition, the dMNG incorrectly draws the conclusion that there are no significant impacts from implementation of the plan that would trigger the preparation of an EIR. The implementation of the dLMP would (1) result in the take of federally listed species, (2) have a significant adverse impact to approved NCCPs (3) result in cumulative adverse impacts to the rare, sensitive and listed species, and (4) result in the loss of conservation value of the San Diego preserve system for many of the MSCP, SDCWA NCCP/HCP and Management Strategic Plan for Conserved Lands in Western San Diego County (MSP) species.

The dLMP/dMNG fails to identify which of the 110 plus species that the above documents identify as “conservation species” in San Diego County occur on CSV and the list of species thought to occur on CSV was a primarily a compilation of information from employees rather than from systematic surveys utilizing standard protocols. DFW also has an affirmative obligation to identify quantifiable objectives for those that occur or may occur on CSV consistent with the above mentioned documents. The dLMP/dMNG even fails to identify the species that the South Coast Region identified over a year ago as important for conserving as part of the development of the 2015 State Wildlife Action Plan.

- 20-F The CSV management plan lacks specificity regarding what the plan and NG address, but it appears to authorize
- 20-G ○ Introduction of human use to CSV at unspecified levels of recreational use, including hunting and equestrian use.
 - 20-H ○ Development of equestrian trails
 - Connecting CSV trails to the adjacent Barnett ranch and other non-DFW properties in the future
 - 20-I ○ Creation of artificial cover utilizing brush piles (apparently to increase quail and rabbit populations for hunting or is it to increase ground squirrel populations to hopefully attract nesting burrowing owls?)
 - 20-J ○ Planting of riparian habitat and other modifications of riparian habitat which are all incorporated under the term “riparian habitat restoration” without addressing the impacts to ARTO or other water column dependent species
 - 20-K ○ Use of fire to modify vegetation conditions without any identification of the desired outcomes or the description of the impacts to fish, wildlife and botanical resources
 - Increase use of pesticides to manage vegetation without: specifying desired outcomes, identifying risks to SDCWA and MSP covered species, MSP species or other sensitive species for specific objectives to be accomplished (e.g. reduce/eliminate Argentine or fire ants, reduce/eliminate non-native forbs, etc.)
 - 20-L ○ Conduct monitoring and management activities inconsistent with the purpose for which the properties were acquired and with a blatant disregard for the DFW obligations in conservation plans, implementing agreements and grant agreements.
 - 20-M

- 20-N** The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project. The incidental take of any threatened or endangered species is not expected to occur with the limited activities proposed. Impacts that would result in a trend towards state or federal listing or loss of species viability for any species or other biological resource are not expected to occur. See also response 20-E.
- 20-O** The commenter did not specify how and what permits are at risk, what aspect of the implementing agreements would be violated or how the LMP will result in the loss of conservation value to the San Diego preserve system. The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project. The incidental take of any threatened or endangered species is not expected to occur with the limited activities proposed. Impacts that would result in a trend towards state or federal listing or loss of species viability for any species or other biological resource are not expected to occur.
- 20-P** The copyright symbol has been removed.
- 20-Q** The commentator does not specify how the SDCWA 2835 permit would be out of compliance. The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The MSCP allows for “passive recreation” such as trails and also states that recreational uses that occur on State lands may also be established in MSCP preserves. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project. The incidental take of any threatened or endangered species is not expected to occur with the limited activities proposed. Impacts that would result in a trend towards state or federal listing or loss of species viability for any species or other biological resource are not expected to occur.

20-N ○ Utilize management and monitoring techniques and protocols which will not result in benefits to species and which could result in take of listed species (the proposed monitoring not provide the data to evaluate the results of DFW actions nor the status and trends of species for which CSV was acquired).

20-O The use of the a negative declaration is inappropriate for the CSV management plan since plan implementation will likely result take of federally-listed species (arroyo toad and quino checkerspot butterfly) and impacts to San Diego thornmint. The appropriate CEQA document for the CSV is an EIR and unless the project is significantly modified would have to include multiple alternatives and findings of overriding consideration in regards to unmitigated impacts to many of the SDCWA and MSCP covered species, MSP species and DFW species of special concern.

20-P Its unclear why DFW has placed a copyright symbol on the dLMP/dMNG since it is a public document that must be available for sharing and copying without restriction (or the appearance thereof). No other DFW management plans posted by DFW's website have the copyright symbol. Members of the public may have failed to provide comments on the dLMP/dMND because of concern of individuals and/or organizations about providing copies to others in violation of copyright law. If in fact the dLMP is copyrighted, it would not be legal for any entity to post a copy of the documents- this is inconsistent with DFW policy. In addition, California courts have found that government entities cannot utilize a "copyright" to restrict access to public records.

Please provide the DFW policy and/or regulation that allows for copyrighting of DFW land management plans or remove the copyright from future drafts. The document also indicates the photos used in the documents are claimed to be copyrighted by either State Parks or the U.S. Fish and Wildlife Service. Please provide the specific policy and/or regulation that State Parks is utilizing to copyright photos taken at public expense. In regards to U.S. Fish and Wildlife Service photos, please provide the specifics of which photos and the owner of the copyright for each photo. In general, the USFWS does not copyright photos taken by employees as part of their official duties and neither DFW nor State Park can arbitrarily claim copyright status for the USFWS. If they are actually copyrighted, then DFW/State Parks will need to display in the documents how the permission to utilize the photos was obtained and the copyright symbol and organization holding the copyright should be displayed with each photo. The documents must be recirculated without the copyright to ensure that all interested parties have had an opportunity to provide comments.

20-Q If DFW moves forward with the approval of the dLMP/dMNG, DFW has an obligation (pursuant to the NCCPA and the IA for the San Diego County Water Authority) to initiate suspension/revocation of the SDCWA's 2835 permit since SDCWA would be out of compliance with the permit issued by DFW (i.e. as the agent for SDCWA for management of the San Vicente HMA, DFW has caused SDCWA to violate the terms

Agency Response

20-R As stated in Section 2.3 of the Plan, SDG&E has two easements within the Reserve.

20-S Section 1.1 of the Plan identifies the purpose of Cañada de San Vicente.

20-Q
cont'd

of the permit issued to SDCWA by DFW). It appears that one part of DFW proposes to take an action that will require another part of DFW to suspend/terminate the SDCWA's DFW permit. DFW and SDCWA will also have an obligation to notify the USFWS that SDCWA is out of compliance with their FESA Section 10(a)(1)(B) permit. See additional information on the requirements of the NCCP/HCP below. Legal actions against permittees and the Department may be a consequence of the approval of the dLMP/dMND by DFW.

The dLMP/dMNG acknowledges that it addresses properties that were acquired by various means. Since the funding sources for the various properties is critical to understanding the obligations that go with each property and run in perpetuity, the dLMP/dMNG should have included that information in the description of the property along with the obligations that go with each property. Based on the information available, the properties incorporated in Canada de San Vicente include:

Parcel Name	Acres	Acquisition Funds		Fund Source Obligations
Monte Vista Ranch	4,056	FESA Section 6	Coastal Conservancy	FESA listed species management and MSCP Obligations
Rancho Canada	394	San Diego County Water Authority		Mitigation/Management pursuant to the SDCWA NCCP and IA
Emerald Oaks/Spitsbergen	311	FESA Section 6		FESA listed species management and MSCP Obligations
Bonfils	256	FESA Section 6	WCB	FESA listed species management and MSCP Obligations

20-R

20-S

Its unclear if any lands on which DFW holds conservation easements are within, adjacent to or nearby since DFW refuses to make available to the public which properties DFW holds conservation easements on. Understanding if and where properties protected by conservation easements (in addition to fee title ownership) is critical to understanding how management of the San Vicente properties articulates with other conservation properties in the San Diego preserve system. Its also unclear if San Diego Gas and Electric owns any rights-of-way within, adjacent to or near CSV. DFW pursuant to the SDG&E NCCP should hold easements of those properties. The dLMP/dMNG should also have included a clear description of how the San Vicente properties fit with and contribute to achieving the conservation goals of the San Diego preserve system. This information could have been easily gleaned from the various documents that have been accepted by SANDAG's Environmental Mitigation Program Working Group (e.g. Strategic Plan for

- 20-T** In Section 10.3.3, the SDCWA NCCP/HCP acknowledges that providing low-intensity recreational opportunities on Preserve Area lands may be acceptable, subject to appropriate constraints to protect Covered Species and natural communities. In addition, finding 4.1.5 states the NCCP does not authorize major public recreational uses (examples defining this elsewhere as motor vehicles or mountain bikes) but does authorize compatible public uses. The recreational opportunities allowed for in the Plan are a compatible public use under the IA and Section 5.3 of the NCCP/HCP, and therefore the LMP is not in violation of either of those documents.
- 20-U** There is nothing within Section 6 grants that prevents public use. Limited public use can help promote the recovery of threatened and endangered species by encouraging the public to assume pride in the ownership of the preserve system as stated in the MSCP. The hunting of species such as wild turkeys could benefit arroyo toads by eliminating a potential predator. Section 4.5.3 (Public Use Element Environmental Research Element: Scientific Research) could lead to the data needed to assist in the recovery of threatened and endangered species. The MSCP states “the MSCP preserve will require an adaptive management program based on focused research of covered species and habitats.” There are no known occurrences of the coastal California gnatcatcher within the Reserve, although suitable breeding and foraging habitat does exist here. In addition, Section 4.5.2 (Educational/Interpretation) discusses educational and interpretive opportunities that will provide the public with a better understanding of the Department’s mission how important it is to conserve open space.

Conserved Lands in Western San Diego County, Connectivity Monitoring Strategic Plan, Invasive Plant Species Strategic Plan, etc. posted at SDMMP.com) of which DFW is a voting member and voted to approve submit the documents to the SANDAG board of directors which they subsequently accepted and incorporated into their land use planning process.

Documents identifying DFW's obligations regarding these properties include:

- San Diego Multiple Species Conservation Program (MSCP) plan and its Implementing Agreement (IA).
 - "Federal and state agencies will manage, maintain and monitor all lands they contribute to the MSCP (whether owned or administered by them as of the Effective Date or later acquired) consistent with the MSCP"
 - For addition details see section 6 of the MSCP
- San Diego County Water Authority's Natural Community Conservation Plan/Habitat Conservation Plan and Implementing Agreement
 - Multiple sections
- DFW's findings and permit for the San Diego County Water Authority's NCCP
 - See Attachment 1 to DFW permit and findings – acres by species for each SDCWA's HMAs
 - The SDCWA authority HCP does not authorize recreation use of HMAs and the only compatible uses in HMAs are identified in finding 4.1.5 (recreation use is not one of the identified compatible uses)
 - Goals and quantifiable objectives have to be included in PAMP's (see DFW's findings, Sections 4.1 and 4.2)
- Multiple FESA Section 6 Grant Agreements-The purpose of these grants are to:
 - promote the recovery of threatened and endangered species
 - conserve land that complements approved HCPs that have important benefits for federally listed and candidate species,
 - conserve land land that have important benefits for ecosystems that support federally listed and candidate species.
 - Grant funds utilized for acquisition of CDSV were targeted at benefiting multiple species including arroyo toad, CAGN and the conservation of linkages critical to conserving MSCP covered species.

(Please note, none of the purposes include recreation use- how will introducing recreation use to Section 6 acquired lands promote the recovery of threatened species?)
- Coastal Conservancy Grant Agreement

Each of these documents creates restrictions on how and for what purpose the Canada de San Vicente lands must be managed and monitored.

20-V The plan states that preservation, enhancement, and restoration of the terrestrial and wetland habitats on the Reserve are a high priority. There is no sycamore/cottonwood habitat identified within the reserve.

20-W The language in the Plan will be changed to reflect non-game species as wildlife. Minor correction to LMP non game replaced with term “wildlife” where appropriate. Potential game species hunted at the Reserve include deer, quail, dove, and turkey. The MSCP states that recreational uses that occur on State lands may also be established in MSCP preserves. According to the USFWS abundance of mourning dove has decreased over the past 49 yrs. (Seamans 2015) in the Western Management Unit. In addition, Christmas bird counts show negative trends for California quail and Department guzzler surveys have shown little reproduction over the past couple of years. Reasons for the downward trend include habitat loss and conversion due to development and recently potential drought related. Turkey populations are increasing within the County. The CDFW is unaware of any studies other than the Christmas bird counts that give regional trends reflecting declining populations of game species at the Reserve.

While deer in the western portion of the county can be considered declining those in the east county are considered stable to slightly declining. However, the current populations, as with deer statewide are well below historic levels found in the 1970's. In the eastern portion of the county deer numbers experience short term fluctuations (5,000 - 7,000 deer) based on weather and wildland fire events which affect forage production. The long-term decline of deer in the east county is due mainly to land management practices that have precluded regular fire resulting in more mature and less diverse habitats, and reduced quality and quantity habitats.

Under sections 4.4.5 Game Species and 4.5.1 Hunting Element, the Dept. proposes surveys and population counts be conducted for all species proposed to be hunted within the Reserve.

20-X CDFW staff has been working and conducting surveys within the Reserve for eight plus years and have found no golden eagle nest within the Reserve. The Reserve does not have suitable golden eagle nesting habitat, but does serve as a foraging area. Additionally, USGS conducted bait station trapping of golden eagles on the Reserve in 2014/15 and concur that there are no golden eagles nesting on the Reserve.

20-V

The dLMP/dMND focus on riparian habitat restoration seems to follow on with DFW's apparent focus on riparian habitat restoration through out San Diego County. These efforts appear to be very misguided and they attempt to restore willow riparian habitat in areas on DFW lands that were historically sycamore/cottonwood habitat. As a result of the focus on willow riparian habitat, DFW has adversely affected the size and duration of flow in streams to the detriment of multiple endemic and regionally important species that are dependent on the stream water column habitat for foraging, escape cover and other life-cycle requirements. DFW has consistently failed to evaluate the impacts of restoration on water availability for species that occupy the dry habitat conditions in San Diego which has been exacerbated by the current drought and will likely be even more of an issue if the currently climate models are correct in regards to the South Coast Ecoregion.

20-W

Its inappropriate to utilize the term non game species to describe most species on CSV. Species should not be grouped by what they are not- "hunted species." The appropriate term would be wildlife and if there is a desire to segment out some of them as hunted species, then that would be appropriate. In do so, it would then be clear to reviewers which species DFW is proposing to all hunting for on CSV. Please explain how the DFW intends to balance the killing of some hunted species on CSV with the requirements in the permits and plans to conserve the species. What data will be collected to justify that the population levels are adequate to allow for some harvest. Currently, it appears that all species that could be hunted on CSV have declining populations and that individuals of the species may be important to their long-term survival on CSV.

Golden Eagle

20-X

There are multiple high GOEA activity areas (areas where GOEA with GPS transmitters utilize for extended periods of time) on CSV and several of the activity area within oak woodland areas. Based on the location of these areas, that may correlate to GOEA primary and/or alternative nest sites critical to maintain the MSCP's required number of active nest sites/territories with the plan area. Potential impacts to these areas and GOEAs utilizing them must be analyzed and measure to protect them from disturbance and degradation must be incorporated into a revised CSV land management plan. No recreation use should be introduced on CSV lands until the important eagle areas are defined, etc.

Quino Checkerspot Butterfly

20-Y

Its very unclear why Section 3.5 (page 3-21) states "**There are no know occurrences of quino checkerspot butterfly within the Reserve**" (emphasis added) when in fact there are multiple occurrence on the reserve that

- 20-Y** This was an error and LMP Section 3.5 will be corrected. The LMP did have the correct information located in Section 4.4.2 under Species Management - Quino Checkerspot Butterfly "Task" 1 and 4 state that Quino checkerspot butterflies have and do occur on the Reserve and the Goals and Task of this section show CDFW is very interested in their preservation and recovery. Section 3.5 of the LMP also state that "breeding and foraging habitat does exist."
- 20-Z** There is no data indicating significant declines in arroyo toad detections at the Reserve. Arroyo toad presence/absence surveys were conducted in 2008, 2009, 2010, 2012, 2014, and 2015 according to USFWS/USGS protocol. Arroyo toads were detected in each of those years. Numerous mitigations for potential impacts to arroyo toad can be found within the MMRP table (Chapter 5). In addition, "Goals" and "Tasks" located in Section 4.4.2 (Arroyo Toad) define time frames for surveys and roadway avoidance methods. Section 3.5.3 (Arroyo Toads) does describe habitat needs. CDFW has in the past and continues to coordinate with the USGS concerning arroyo toads and other species around San Diego County. The Department in conjunction with the USFWS and the San Diego Management and Monitoring Program are developing monitoring protocols for a number of sensitive species. If and when new monitoring protocols are adopted for arroyo toad the CDFW will incorporate them to the extent practical. The LMP addresses biocorridors and their importance for gene flow, seed dispersal, daily movement, etc. in Section 4.4.1.1. Section 4.4.1 (Habitat Management "Riparian and other Wetland Communities) also addresses maintaining and enhancing riparian vegetation for special-status species needs. The following are quotes from above comment: "The data indicates a significant decline in arroyo toad detections since 2009" and "The arroyo toad surveys are detection surveys not surveys that will not provide data regarding changes in its population. Again, presence/absence surveys will only detect a change if the species disappears from CSV." No new activities should be introduced on CSV lands until the ARTO population has recovered. There is no data indicating significant declines in arroyo toad detections at the Reserve. According to the Survey Protocol for the arroyo toad (USFWS 1999), "If the sole purpose of surveys is to determine the presence or absence of the arroyo toad, surveys shall cease immediately upon determination that arroyo toad eggs, larvae, juveniles, or adults are present in the survey area." Using this protocol, surveys cease upon detection and declines would not be shown. In addition the protocol states, "The Service recommends that the following survey guidelines be used to determine if arroyo toads are present in the vicinity of proposed activities, but cautions that negative surveys during a year of severe weather (e.g., drought, extended rainy season, cold weather) may be inconclusive." While presence/absence surveys are not designed to monitor populations it does establish continued presence at the Reserve and you can obtain additional information such as age class and indicators of breeding activity.

20-Y
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have been documented by both DFW land managers and private consultants. There were multiple detections of quino in 2009 on CSV (see MSP species occurrence table, SANBIOS and DFW documents released pursuant to the California Records Act posted at <ftp://ftp.dfg.ca.gov/CDFW/15-04-129-Batiquitos-RchoCanada-Baseline%20Bio%20Surveys%20R5/>) for detection locations. In addition, the FWS has identified quino population recovery areas on CSV (see MSP species goals and objectives). This critical information regarding a federally listed species should have been in the CSV plan and must be a significant consideration in how CSV is managed and monitored. The draft management plan's proposed uses and management of CSV will very likely result in the take of this species in violation of the FESA and put DFW employees and visitors to CSV in jeopardy of violating the take prohibitions of the FESA. All known and potential nectaring, egg/larval, hill topping areas should have been mapped and utilized for evaluating impacts- none were.

The documents that were released pursuant to the public records act request regarding CSV includes documentation (including maps showing detection locations and pictures of quino on CSV). DFW knows there are quino on CSV and DFW employees who helped prepare and edit the dLMP/dMND were very much aware of the presence of quino. Why was the presence of quino on the preserve withheld from the public? Did someone decide their presence would create a problem for introducing public use on the preserve and the obligations DFW would have for their management (including habitat) and monitoring pursuant to the Section 6 grant that was use to purchase portions of the property?

Arroyo Toad

20-Z
cont'd

While DFW has detected arroyo southwestern toads on CSV, the management plan fails to identify the areas of San Vicente Creek that are occupied, identify any objectives and time frame for arroyo toad management actions and does not proposed a monitoring protocol that will assess its status and trend (including changes in threat/stressor levels) that will the data critical to making management decisions. The dLMP/dMNG fails to put this occupied area into the context of the San Vicente Creek population (the population extends downstream onto City of San Diego Cornerstone Lands). The toads on CSV may be the source for long-term occupancy of San Vicente Creek by arroyo toad and special management considerations of the stretch of San Vicente Creek on CDV appear to be warranted. In addition, the dLMP/dMNG includes the restoration of riparian habitat on San Vicente Creek which would likely result in adverse modification of arroyo toad habitat and indirectly or directly take arroyo toads in violation of FESA. The dLMP/dMNG fails to recognize and describe the habitat needs for this federally listed species- it is not riparian habitat but rather open (little to no riparian habitat) stream areas generally within active sand transport. USGS can provide DFW with the specifics of optimum areas for arroyo toad in San Diego County based on their extensive surveys and modeling.

20-AA The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project.

The Reserve was surveyed in 2014 by the USGS and no badgers were detected. A badger species account has been added to Section 3.5.2. Section 4.4.2 explains why the LMP does not include the American badger as a distinct biological element and also addresses future establishment of the goals and objectives for this species if/when detected. According to Title 14 subdivision 2 chapter 5 §460 of the Fish and Game codes defines badgers as “furbearing mammals.” There is no mention of the hunting of furbearing mammals within either the LMP or NMD. Currently, all hunters participating in any Department sponsored hunt are required to attend the pre-hunt briefing conducted prior to each hunt. These briefings include topics such as safety, hunt boundaries, rules of the hunt and other pertinent information. An additional Mitigation measure has been added to the MMRP table regarding these briefings that will also include an education component such as protection of cultural resources, protection of natural resources and protection of species listed by CDFW and USFWS as threatened, endangered, or species of concern.

20-BB While there are records for lion loss in the Ramona area they are few compared to eastern San Diego County. The main cause of mortality in the Ramona area is clearly depredation due to the loss of domestic livestock. There are a few roadkill’s recorded but not many.

20-Z
cont'd

The data released by DFW pursuant to a records act request contains extensive arroyo toad monitoring data that was not included (even in summary form in the dLMP/dMND. The data indicates a significant decline in arroyo toad detections since 2009 and also includes recommendations regarding the potential take of toads on roads within CSV (many toads were detected in areas where they had to cross roads to get to the stream corridor. Not mitigation measures are included to reduce the take. The decline in detections should have been disclosed in the documents and measures included to determine the cause of the decline and to reverse it. DFW should have considered road closures and rerouting to reduce threats to the ARTO populations. No new activities should be introduced on CSV lands until the ARTO population has recovered. What take avoidance and other mitigation measures were in the DFW survey reports, which ones were implemented and how effective were they? Will all of them become conditions in the LMP.

20-AA

American Badger

The dLMP/dMNG implies that CSV is not important to badgers because they have not been detected at the CSV. Because the dLMP/dMNG to an insular approach to addressing species, the preparers failed to take into consideration that this species has been detected on the adjacent Barnett Ranch Open Space Preserve and on the nearby City of San Diego Cornerstone Lands. Badger are extremely difficult to detect and with the low level of badger survey effort at CSV, its not surprising they were not detected. That does not mean they are not utilizing CSV since they have large home ranges. This is a critically endangered covered species in western San Diego County, its an MSCP covered species and a priority 1 MSP species. The proposed uses of the preserve will adversely affect badges utilizing CSV.

Since there is no prohibition on the take of badgers, will hunters on CSV be allowed to take badgers, how will DFW monitor their take and what impacts will take of badgers at CSV have to the apparently small disjunct population remaining in western San Diego County (a different subspecies from those occurring in eastern San Diego County). If take will be prohibited, how will hunters be educated regarding the prohibition and since it isn't addressed in the dMND, will the take prohibition in Title 14 require an additional CEQA document?

20-BB

Mountain Lion

This species appears to be declining within the MSCP and has experienced very high mortality rates in western San Diego County. DFW's mortality records have been assembled by DFW and analyzed by researchers and the primary causes of mortality in San Diego County are vehicles and that associated with DFW depredation permits/human safety issues. CSV is a key area for the preservation of mtn. lions in western San Diego County with multiple lions utilizing it for breeding and feeding habitat. The importance of this area for lions cannot be overemphasized. It is at the heart of multiple male and female territories and the deer on CSV serve as a key foraging resource for multiple mountain lions.

(20-BB cont'd.) It is reasonable to assume that annual take of a few deer will not significantly alter lion numbers, behavior or movement. Removal of several deer annually is even less significant given that areas surrounding the Reserve are not hunted and no other significant causes of deer loss are known. Thus, the take of a few deer will not have an adverse effect on deer numbers on the Reserve or the surrounding area. The Reserve would have more tightly regulated public access than surrounding public lands. Opening any property up to the public, having unrestricted public use, and having daily public access does increase the risk of ultimately having to take a lion on perceived or actual public safety unrelated to hunting (Orange County parks are a good example). Reality is that the two main causes of lion mortality are depredation and roadkill which are unrelated to management of the Reserve. Loss of lions due to public safety, during hunting, and deer hunting impacts on lions are insignificant in relation to the real causes of mortality and those that need to be addressed if long-term conservation of lions in an urbanized preserve system is to be achieved.

The number of hunts and participant numbers will be determined through species population surveys.

20-CC Our local deer populations (San Diego and Santa Ana Mountains) were originally typed as a subspecies based on morphological features rather than genetics, but have more recently been confirmed through genetic analysis by CDFW forensics lab as well as work done by Jim Hefflefinger, *Molecular Ecology* (2009) 18, 1730-1745. This work shows that there is a sharp transition in haplogroup composition in deer inhabiting central and southwestern CA in comparison to deer inhabiting southeastern CA. This difference corresponds to the boundary of the Sonoran Desert ...that is deer to the north are more similar to our local deer than are deer to the east. Thus, our local deer share far more similarities than differences to other deer inhabiting the state. This remains the case even with more recent human caused "fragmentation" which may have occurred between and within the various subspecies. Regardless, all deer in San Diego County are of one subspecies and managed as such. There are no unique or "localized" populations and thus no reason to evaluate hunting of deer at Cañada de San Vicente (if carried out under existing deer hunt regulations) on a localized level.

20-DD The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. Section 1.1 states "Cañada de San Vicente Reserve (Reserve) was acquired by the California Department of Fish and Wildlife to conserve, protect, and restore core habitat areas, and provide crucial wildlife linkages in the San Diego County Multiple Species Conservation Program (MSCP)". Section 4.4.1.1 discusses the Reserve as part of a regional biocorridor complex and "Goals and "Tasks" pertaining to landscape linkages are mentioned within this chapter.

20-BB
cont'd

Its unclear why the dLMP/dMNG did not utilize the data that has been collected by mountain lion researchers, especially since DFW was highly involved it those research efforts and permitted the capture and fitting of GPS collars of all lions in the study and provided access for the capture of lions on CSV. The dLMP/dMNG failed to address the impacts of recreational use (including hunting) on mountain lions (an MSCP covered species and an CMSP linkage species). Deer harvesting could result (1) in changes in how mountain lions utilize CSV, (2) reduce their prey (bucks often make up a disproportionate share of their prey during some periods of the year), (3) potentially push lions onto adjacent private property where they may prey on livestock and be subject to killing pursuant to a DFW depredation permit, (4) expose them to greater risk from mortality from hunters (there are multiple recent incidents where hunters have killed lions in southern California). In addition, opening CSV to other recreation uses will increase the likelihood of lion/human encounters that could result in the take of lions for public safety purposes. None of these issues were identified and evaluated in the dLMP/dMNG. Since CSV was acquired for conservation purposes, no activity on CSV should be authorized if it has the potential to negatively affect the conservation values for any of the MSCP, MSP and SDCWA species. To do so would be inconsistent with the permits and agreements that DFW has reached with multiple parties and could affect the validity of those permits and agreements.

20-CC

Hunting

Genetic studies funded by DFW indicate that deer populations in various parts of San Diego County are developing different genetic signatures where roads intersect their habitat (the studies are posted at wildlife.ca.gov and at SDMMP.com). This clearly indicates that deer populations becoming fragmented. No longer can the deer populations be considered part of a meta population in western San Diego County. Any impacts to deer, including hunting, must be evaluated based on the impacts to the localized population rather than on a perceived meta population.

20-DD

Corridors , Linkages and crossings

The dLMP/dMND fails to identify the importance of CSV as a key portion of the regional core and linkage system that must be appropriately managed to ensure the conservation goals and objectives in various conservation plans DFW has approved are met. It only focuses on San Vicente Creek as a wildlife corridor. There was adequate information available regarding how CSV fits into the regional picture including regional linkage maps in the CMSP but the available information was ignored by the preparers of the plan The CSV plan fails to use the regional terminology (used in the MSCP, MSP, CMSP and agreed to by FWS and DFW) in regards to cores, linkages and crossing in already approved documents. Consistent use of term is important in helping the public understand the importance of CSV and the adverse impacts that would occur if this dLMP/dMND. Many species use broad areas of CSV as linkages to other conserved lands, not just the San Vicente Creek

20-EE The MSCP does not prohibit recreational use and also states that recreational uses that occur on State lands may also be established in MSCP preserves. Public use as it relates to hunting is done seasonally and not at a time when listed species or nesting birds are likely to be found. Hunting opportunity is restricted by the use of a draw system that will give managers the ability to set the number of participants and the number of hunts available See Impact Guidelines page 4-40. Section 4.4.1 Habitat Management “Goals and Task” of each habitat area addresses “biosecurity measures” and the use of CAL-IPC BMPs. Agency criticism of the amount of” recreational use” mostly pertains to multi use trails and multiple trails. The Reserve’s trail proposal is one trail, within an existing roadway, within a very limited extent of the Reserve and has no connecting roadways that can lead unauthorized trail users to other parts of the Reserve. Additionally, the Reserve would remain a closed zone open to permit and special use only see Section 4.5 of the LMP. The draft LMP and subsequent MND has measures in place that avoids or minimizes any impacts to an insignificant level in regards to the public use being proposed.

riparian corridor. There should be a detailed connectivity section to the dLMP/dMND that describes the how CSV fits into the regional core and lineage system, its current condition both on and off of CSV lands and the threats/stressor to connectivity that might change based on different CSV management scenarios. Instead, the dLMP/dMND identifies the San Vicente Riparian areas as a corridor and proposes to monitor it in the future to determine how it is being used. Currently available mountain lion data was not even mentioned and no methodology/protocol for future linkage and corridor monitoring was proposed. More importantly though, the “question” future monitoring data would answer was not in the documents so an appropriate protocol could be developed and costs identified. The dLMP identifies the riparian corridor along San Vicente Creek as an important wildlife movement corridor without providing any objective data to support that conclusion and then goes on to identify the need to evaluate wildlife use of it. While it is likely that wildlife move along the riparian corridor to meet their daily and seasonal needs, its unclear is it serves as a corridor in the larger sense of the term.

Recreation Use

The dLMP/dMND fails to address and disclose the significant unmitigated wildlife impacts from introducing recreations use on the CSV. There is large body of scientific literature on this issue. DFW has a multipage annotated recreation/wildlife bibliography that was prepared by Colorado State University for DFW (posted at wildlife.ca.gov and at SDMMP.com). Studies in California were done on and adjacent to DFW lands. One study conducted by UC wildlife researchers in northern California found significant differences in wildlife occupancy between properties with no recreation use and properties with low-moderate recreation use. Human use along riparian corridors is even more detrimental, especially during nesting and migration seasons.

The dLMP/dMND does not include any biosecurity measures to reduce the chance that invasive and exotic species will be introduced into the preserve system as a result of recreation use, including use by recreational livestock and foot traffic. Recently have biological consultants working on multiple preserves been asked to clean their shoes each time they visit an area to conduct botanical surveys. This relatively simple measure isn’t even incorporated into the dLMP/dMND- why?

The wildlife agencies have been very critical of the amount of recreation use permitted on other MSCP preserves yet the dLMP/dMND proposes do use CSV in a similar manner. The dLMP/dMND fails to clearly identify the proposed level of recreation use and it’s timing and how use levels and impacts to wildlife will be quantified and monitored. Studies in San Diego fund by DFW have shown that its difficult to collect reliable data on human use of preserves and that any monitoring program has to be well designed and implemented. While there is a large public demand for recreational opportunities in San Diego County, DFW’s first obligation is

Agency Response

20-FF Public use of the Reserve is restricted and the Reserve is within the Department's Law Enforcement Division's (wardens) regular assigned area of coverage. Request for additional enforcement activities can be made if needed. Additionally, staff living onsite give an extra level of protection on the Reserve.

to the conservation of wildlife and compliance with existing permits and agreements. In fact, the SDCWA permit and implementing agreement clearly states that recreation use of mitigation lands for its projects does not include recreation use of those lands.

Utilizing a recreation oriented contractor for the preparation of the dLMP/dMND likely biased the planning process – recreation is what they do. The purpose of acquiring CSV was not for recreation purposes. The management zones (back country, etc.) identified in the dLMP/dMND have now relation to species biology and/or species/habitat management needs. The concept is misguided, inappropriate and appears merely to serve as an underlying recreation management zoning that is often encountered in a State Park. CSV is not a state park – its primary purpose is the conservation of MSCP, SDCWA, MSP, and other sensitive species.

Law Enforcement

20-FF

The dLMP/dMND does not identify the level of additional law enforcement resources that will be necessary if additional human access is allowed on CSV. In San Diego County, the preserve managers from multiple organizations (City, County, DFW, NGOs) have identified lack of law enforcement resources as a significant issue that results in adverse impacts to wildlife resources and their habitat. A large percentage of impacts occur on preserves where recreational access is permitted. The City of San Diego had documented how increased law enforcement has reduced illegal use and increased wildlife use of City MSCP conservation lands. SANDAG currently provides funding for some additional law enforcement on preserves through funding to DFW for warden overtime. There is no slack left to do more of this, DFW's warden time is fully subscribed. State Parks (preparers of the document) may not have even recognized this as an issue since all of their Park Rangers are Peace Officers whereas none of DFW's land managers have any enforcement capabilities and DFW does not even have ranger like positions on their properties.

Threats/Stressors

Understanding what threats/stressors and their magnitude is critical to adaptively managing preserves. While it is often the perception that preserve management is species based, almost always its threat/stressor based. One of the key components of conceptual models that are utilized in an adaptive management programs is the identification of the threats/stressor (sometimes also referred to a "drivers") that affect the species/vegetation communities etc. While the dLMP/dMND purports that it will utilize an adaptive management approach at CSV, it totally fails to identify the threats/stressors that currently and in the future (during LMP implementation) will affect species (including the habitats on which they depend) and ecosystem processes. Small threat/stressor changes such as an increase in occupancy of a preserve by Argentine ants can have devastating impacts on a preserve focal species

20-GG Section 4.6.6 (Fire and Fire Management “Vegetation Management”) includes proposed actions to reduce fire hazards. CAL FIRE has conducted site inspections at the Reserve to advise and coordinate with Department staff on fire prevention and response. Additionally, Department staff including the Reserve manager has received CAL FIRE training and has been issued firefighting gear (PPE’s) so that they could be onsite to advise fire fighters in order to avoid/limit impacts to sensitive resources.

resulting in reduced conservation value or extirpation from the preserve. The MSP provides a comprehensive list of threats/stressors and their magnitude of impact to the San Diego preserve system yet the dLMP/dMND does not list and quantify these already identified threats/stressors nor is monitoring of them and changes to them proposed. Why didn't the dLMP/dMND utilize the recognized threats/stressor identified in the MSP in a step-down approach to the reserve level. It would have been a relatively easy task to create a matrix of species and or species groups and threats/stressors at CSV and identify how those threats/stressors would change as the management plan activities are implemented. This would have made it easy for DFW and the public to understand what impacts would occur, potential mitigation measures and which impacts even with mitigation might be significant and require deletion of the activity or the preparation of an ERI and any associated findings of overriding considerations. Why wasn't this done?

Fire

While the dLMP/dMND recognizes that wildfire is a significant threat to CSV, there are not significant actions proposed that would reduce the threat. Based on the fire threat modeling by USGS, CSV is in a high risk area and steps should be taken to reduce those risks. The dLMP/dMND fails to utilize any of the information from the extensive efforts led by USGS to identify and develop wildfire mitigation strategies- pre-, post- and during). The information has been readily available and presented at multiple monthly San Diego Management and Monitoring Coordination meetings (held at USGS and sponsored by the SDMMP), workshops etc. While DFW has generally been represented at the meetings, it does not appear that any of the DFW employees that helped with the preparation of the dLMP/dMND attended the meeting regularly so maybe there has been a communication issue about the available information within DFW. Fire planning for MU 4 (where CSV is located) is intended to be on a preserve complex scale since there are no natural breaks in the vegetation between large blocks of conserved intact habitat. The preserve complex (for fire planning purposes) that CSV fits within extends from SR 67 eastward to the Forest Service boundary and includes City, County, DFW, and tribal lands. The dLMP/dMND must be revised to incorporate the cumulative and collaborative issues associated with planning for wildlife fires and response to them.

In addition, the dLMP/dMND should include clear direction to seek compensation for impacts to CSV from wildfires when an individual or entity is found to have caused the fire. The County of San Diego received damage payments from SDG&E for impacts to County Open Space preserves SDG&E caused whereas DFW apparently did not seek compensation to DFW preserves. Ranch Guejito recently received a substantial settlement from SDG&E for wildlife fire damage (primarily oaks) to its lands. In addition, since SDG&E will be shutting down many of its lines during extreme wildfire conditions, the dLMP/dMND should also address the need for a backup generator(s) to power its water system so it can be utilized for structure protection should the SDG&E power be shut off.

20-HH Experts within the Department including local staff advised the preparers of the Plan. Section 6 has been updated to reflect recent reports from the Natural Resource Agency.

20-II As stated in Section 4.4.6 “In an effort to meet the required goals of both the MSCP and SDCWA NCCP/HCP, the Department has incorporated the goals of these plans, where appropriate, into the Monitoring Program for the Reserve. In addition, the Department is also incorporating goals and objectives from the Strategic Plan (SDMMP 2013) where suitable.”

20-JJ The department believes these two mission statements are consistent. We interpret the regional mission to include all conservation values (ecological, intrinsic, etc.).

20-KK The LMP and MND were updated reflecting the purpose of the various acquisitions of the existing Reserve.

Climate Change

20-HH

While the dLMP/dMND mentions climate change it does not include any meaningful adaption strategies linked to DFW's or the Natural Resource Agency's broad scale climate change strategies. DFW's climate change lead scientist is a Region 5 employee yet the dLMP/dMND appears to not include any input from her. In addition, there are multiple downscale climate change models for Southern California vegetation communities and species yet the dLMP/dMND fails to utilize them in any meaningful way as part of the climate change strategy for CSV. CSV lies at a key elevation for providing opportunities for implementing climate change strategies for a wide variety of species and vegetation communities including CSS, California gnatcatcher, golden eagle, San Diego thornmint. The dLMP/dMND fails to include them, why? In this and many other ways, the dLMP/dMND preparers seemed to have forgotten to involve/communicate with the conservation program part of DFW that focuses on climate change adaptation strategies

Monitoring

20-II

The meager monitoring elements of the dLMP/dMND suffers from a lack of understanding of the scale at which meaningful monitoring must be done to understand/detect changes in populations. DFW scientists help develop a report which address the monitoring scale issues in Southern California yet it is not even referenced in the document nor are the monitoring scale issues addressed in the MSP (both are posted at SDMMP.com). In addition, extensive analyses have been done of the MSCP botanical monitoring data from San Diego and the conclusion was that the data collected could not be statistically analyzed and could not be utilized to inform adaptive management actions. The dLMP/dMND propose to utilize a protocol (including monitoring frequency) that would provide even less meaningful data yet other San Diego conservation land managers (including State Parks but not DFW) are utilizing the new approach. Why is the state trustee agency for Californian's fish, wildlife and botanical resources so far behind in their approach? Why was the monitoring protocol for annual plants being utilized by almost every other land manager in San Diego not incorporated in the dLMP/dMND?

Comments keyed to specific portions of the dLMP/dMND

20-JJ

P 1- 3 The Region's mission statement is inconsistent with DFW's mission statement and points to one of the key considerations that is missing from the dLMP/dMND- ecological values of species and habitats.

20-KK

P 1-4 This section also needs to include the purpose for which the lands were acquired since its critical to framing the potential management and monitoring requirements and other uses of the property. Based on emails between DFW and State Parks, it appears that a decision on what uses would occur on the property

20-LL The Plan and associated MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. See also response 14-A.

20-MM The MSCP, SDCWA NCCP/HCP, and the SWAP were added to Section 1.4 of the LMP.

20-NN The Plan and associated MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The Barnet Ranch Open Space Preserve was included because it is immediately adjacent to the Reserve.

20-OO See response 14-A

20-PP Section 3.3 contains the most up-to-date information on botanical resources within the Reserve including surveys conducted by CDFW and the San Diego Natural History Museum. Both wildlife and plant species list have been updated noting the known presence of MSCP and SDCWA NCCP/HCP covered species.

20-QQ A sensitive species figure has been placed into the Plan. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project. See also responses 20-I, 20-Z, and 20-EE.

was made prior to the release of the dLMP regardless of their impacts. Those emails discuss where the equestrian trail will be located not if an equestrian could be built without causing significant impacts to species, vegetation communities and the ecological function of CSV. All documents provided to Ron Rempel pursuant the public records act request are hereby incorporated by reference since they are already in DFW's possession. What was the specific data that was available but not referenced in the dLMP/dMND?

20-LL | One of the purposes of the LMP must be to identify how DFW will meet its obligations to manage CSV pursuant to the MSCP, SDCWA NCCP, and grant agreements that have been entered into by DFW.

20-MM | Page 1-5, Section 1.4 should include references to the MSCP, SDCWA NCCP, MSP, San Diego Gas and Electric NCCP, the DFW Climate Adaptation Strategy and the California Wildlife Action Plan.

20-NN | Page 1-5 There are many conservation properties near CSV and are part of MU4 and the plan should mention them in addition to Barnett Ranch. CSV lands play a key ecosystem role in a much wider area than is addressed.

20-OO | Page 2-4 The LMP should reference the applicable SDG&E maintenance constraints in their NCCP

20-PP | Section 3-3 does not utilize the best and most recent information on botanical species occurrences in San Diego County and should be revised so the public can fully understand how CSV fits into the regional conservation goals and objectives. This section should include all MSCP, SDCWA, and MSP species and clearly identify in one table which of these species occur or may occur on CSV. The data and meta data from the CSV botanical surveys should be in an appendix to the plan and if no botanical surveys were conducted it should be acknowledged. DFW requires the city and county to do baseline botanical surveys on the preserve properties, is DFW holding themselves to a lower standard?

20-QQ | Section 3-4 includes inaccurate information in species descriptions and does not use the available information regarding where animal species might occur on CSV. Quino have been detected on CSV per SANBIOS and the information is in the MSP. This section needs to be revised to incorporate know detections of all MSCP, SDCWA and MSP species on CSV and the CEQA document for the plan must address any adverse impacts to these species from the implementation of the LMP.

The data sources for bat locations need to be provided as is the case for all other animal species.

Mitigated Negative Declaration

20-RR The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The limited activities proposed will not result in impacts considered “significant” under CEQA. With appropriate mitigation measures implemented into the LMP, no listed (State or Federal) endangered or threatened species, or other biological resources considered as sensitive are expected to be significantly affected by the project. The modest increase in vehicle traffic during controlled public use opportunities would not result in take of arroyo toad because vehicle traffic would be restricted to daylight hours and not night time when toads may be out foraging. Also, the majority of visitor use would take place during the fall and winter September-December when toads would likely be estivating. See also response 20-J.

20-SS The MND adheres to the conservation strategies of the MSCP and SDCWA NCCP/HCP. The SDCWA NCCP/HCP is not in jeopardy.

Page 29 The LMP does not contain adequate information to determine that the project activities will be limited in size, scope and duration. Saying it does not make it so. To reach this conclusion, the size, scope and duration would have to be identified or maximum limits of the size, scope and duration would have to be specified and the constraints where the activities could occur would have to be identified. While the current CEQA document purports to evaluate these impacts, its it could not but since there is a general lack of species survey information and any specific project information (size, scope and duration). Term such as “should be”, “largely confined” and “not expected” leave it to “in the eyes of the beholder” and must be replaced with specific limiting terms for a negative declaration to be appropriate CEQA document for this project.

20-RR

Enhancing riparian vegetation communities would likely result in adverse modification of ARTO habitat and affect breeding areas. As such it would be a significant impact and require the preparation of an EIR not a negative declaration for CEQA compliance. Increased traffic on CSV roads would also likely result in take and it is already identified issue in DFW’s ARTO survey reports.

The plan contains no elements that would improve the dispersal/movement of wildlife through CSV and in fact would result in adverse impacts to dispersal and movement if the plan is used to authorize public use of the preserve. The impacts of public use were not evaluated in respect to wildlife movement. The regional linkage are already known and the plan would not provide any additional information since it does not commit DFW to doing any **linkage** monitoring studies as part of the CSV management plan.

While a plan goal may be to preserve Engleman Oak woodland, there are no SMART objectives that will be measured to demonstrate the goal is being met. What recruitment rate over what time frame is needed to ensure the persistence of Engleman Oak woodland, what is the detection program GSOB and other pathogens and what actions will be taken if they are detected? What biosecurity measures will be taken to reduce the risk of pathogen introduction? Will DFW employees and others be allowed to import, export or utilize firewood from the property? A biosecurity effort similar to that being implemented by Ranch Guejito should be implemented on CSV.

20-SS

The plan is not consistent with the MSCP and SDCWA NCCP and associated permits. See attachment of excerpts from the permit and findings. The plan totally lacks quantifiable objectives as required by the SDCWA NCCP and DFW Permit and its implementation would likely jeopardize the SDCWA permits and make them vulnerable to legal actions.

The table of Avoidance and Minimization Measure does not include any avoidance and minimization measure but is primarily a list of surveys and monitoring efforts that are general in nature and not based on the best available science. A gaping hole in the so-called CSV “monitoring efforts” is data analysis and feed back to

20-TT Though annual surveys for annuals are preferred, due to continued staffing and budget constraints this is not likely to occur. The CDFW has initial baseline location data for a number of special status plants species.

Quino checkerspot can exhibit erratic changes in abundance from year to year making monitoring very problematic. Monitoring for these trends would require extensive sampling each year and due to continual staffing and budget constraints would be impractical to accomplish. Longcore et al. (2003) proposed a monitoring scheme for Quino with surveys conducted every three- five years as proposed by the CDFW.

20-UU The Department is involved in regional monitoring efforts throughout the County. Department staff regularly attends SDMMP meetings and also attended rare plant monitoring workshops in 2015 conducted by the SDMMP.

management and future monitoring. While DFW may monitor some species, it seldom analyzes the data and/or contributes it to regional datasets. In fact, DFW has a history of refusing to provide the data it collects to the regional database.

Establishing vegetation plots may sound like it will provide important information to inform management but its likely DFW will be able to establish an adequate number of plots to obtain statistically reliable data. This issue has been evaluated extensively in San Diego and interannual variations, varying slope and aspects, observer bias etc. has confounded most of the data analyses. While it may sound good in the document, it is highly unlikely to work. In addition, monitoring does not start with collecting data, it starts with identifying the objective(s) and associated questions. See Atkinson et. al.

Public interpretation is not an every preserve unit obligation. DFW needs to work with other preserve system managers to identify where interpretive efforts are best situate and assist with interpretation programs at the most appropriate and least impacting areas. Since Barnett Ranch is already open to the public, maybe it should be a MU interpretation area – more efficient and less impacting than creating a new program at CSV.

Annual rare plant surveys every 3-5 years will not provide the data needed to evaluate status and trend of annual plants- there's too much interannual variation to obtain statistically valid data. This issue has been evaluate and addressed extensively in San Diego by multiple entities, some of which were funded by DFW. Why is DFW not participating in the regional rare plan monitoring efforts that are designed to inform adaptive management of annual plants when most other conservation land managers in San Diego are, including State Parks. CSV was acquired in part to meet DFWs and SDCWA's obligations to assemble a regional preserve system and its DFW obligation to manage and monitor it as part of the regional preserve system not as a stand-alone preserve.

Doing quino surveys every 3-5 years is inappropriate for this species due to its broad population fluctuations, colonization and extinction events, etc. In addition, critical to understanding CSV's importance to quino, the source population for the area needs to be identified- is it on CSV or other conserve lands nearby? It is also unclear if DFW has any permitted quino surveyors on staff or if DFW proposed to contract out the work. Will the surveys be detection surveys or population monitoring surveys where covariate data is collected along with data on larval, nectaring and hill-topping areas. What is the question(s) that the surveys are intended to answer? Has the question(s) been vetted with the group working on quino recovery in San Diego? How are 3-5 year interval quino surveys an avoidance and minimization measures.?

The arroyo toad surveys are detection surveys not surveys that will not provide data regarding changes in it population. Arroyo toad surveys (including covariate data) on CSV should conform to the regional monitoring efforts. Again,

20-TT

20-UU

20-VV Game species are defined in Title 14 of the Fish and Game code and additional species specific information can be found in Section 4.5.1 "Hunting Element." The routine maintenance of the guzzler is not part of this MND or LMP comment venue.

20-WW Because of the high abundance of naturally-occurring perches (e.g. trees and other taller vegetation) within the Reserve, the removal of fence posts would not significantly affect bird species that may use them as perches because there are other ample perches in close proximity for them to move to. Additional information on fencing removal has been included in the plan.

presence/absence surveys will only detect a change if the species disappears from CSV, they won't help conserve the species.

20-VV

Its unclear what game species the game species inventory is trying to detect. Did the authors actually mean census the game specie as part of a hunting program who's impacts have not been evaluated? Creation of brush piles and the installation of guzzlers may directly or indirectly impact other species and those impacts were not addressed in the dLMP/dMNR. Its unclear if the guzzler work recently mentioned on NPR by Jason Price was done at CSV, but if so, it should not have occurred without an appropriate CEQA document since it was a discretionary action and was a project under CEQA. If DFW prepared a CE for the guzzler work, please provide a copy of it.

20-WW

Removal of fence posts may be adversely affect some species, especially species that hunt from perches. Specific parameters of when to remove and when to leave them should be included in the dLMP/dMND.

