

Response to Comments

I. Introduction

The Sycamore Canyon/Goodan Ranch County Preserve Resource Management Plan Update (proposed project) along with the proposed project's draft environmental document was available for public review for 31 days beginning on July 21, 2023, and ending on August 21, 2023. The County of San Diego Department of Parks and Recreation (DPR) posted an electronic version of the Draft Initial Study/Mitigated Negative Declaration (IS/MND) on DPR's website (www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html) and hard copies were available for review at the County of San Diego, Department of Parks and Recreation, at 5500 Overland Avenue, Suite 410, San Diego, CA 92123; the Poway Library, at 13137 Poway Road, Poway, CA 92064; and the Lakeside Library, at 12428 Woodside Avenue, Lakeside, CA 92040. A Notice of Intent to Adopt a Mitigated Negative Declaration was posted with the County Clerk on July 21, 2023; posted on DPR's website (www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html); mailed to 132 residents within an approximate 2,000-foot radius from the Preserve; and mailed to various agencies, organizations, individuals, and known interested parties. A Notice of Intent was published in the San Diego Union-Tribune on July 21, 2023. All requisite documents, including the Notice of Completion form, were also sent to the State Clearinghouse (SCH) on July 21, 2023 (SCH Number 2023070450) and posted on CEQANet.

II. Comments Received on the Draft Initial Study/Mitigated Negative Declaration

DPR received 5 formal comment letters and 77 email comments on the Draft IS/MND during the public review period. Topics included biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, recreation, transportation, and parking. Table 1 lists the agencies, organizations, and individuals that provided comments. Each comment letter or email is assigned a number and comment has been assigned a consecutive letter that corresponds to a response number (e.g., Response to Comment 1-a). Where comments warranted revisions to the Draft IS/MND content, excerpts were included with ~~strikeout~~ text indicating text that was removed from the Draft IS/MND and underlined text indicating text that was added to the Draft IS/MND. All comments are included in the record for consideration by the Board of Supervisors, or designated representative, responsible for adopting the IS/MND.



Table 1. Agencies, Organizations, and Individuals that Submitted Comments on the Draft IS/MND

Number	Agency/Organization/Individual Name	Date	Page
Agencies			
1	California Department of Transportation District 11	8/21/23	5
2	U.S. Fish and Wildlife Service/ California Department of Fish and Wildlife	8/22/23	10
Organizations			
3	San Diego Mountain Biking Association	8/21/23	22
4	San Diego Mountain Biking Association/ California Mountain Biking Coalition/ Latino Outdoors/ San Diego Trail Alliance/ Lakeside Frontier Riders/ Backcountry Horsemen of San Diego/ San Diego Ultra Running Friends/ Allied Climbers of San Diego/ Tijuana River Valley Equestrian Association	8/21/23	24
5	San Diego Wildlife and Habitat Conservation Coalition	8/21/23	27
Individuals			
6	Basil Aruin	7/24/2023	90
7	Daniel Carr	7/24/2023	91
8	Byron Chesebro	7/24/2023	92
9	Daniel Fellenbaum	7/24/2023	93
10	H. Anthony Harris	7/24/2023	94
11	Bob Kain	7/24/2023	95
12	Samer Khodor	7/24/2023	96
13	Danny Petkevich	7/24/2023	97
14	Andy Robertson	7/24/2023	98
15	Paul Schroeder	7/24/2023	99
16	Evan Sutton	7/24/2023	100
17	Michael Taffe	7/24/2023	101
18	Joel Baumgartner	7/25/2023	102
19	Mickey Booz	7/25/2023	103
20	Larry Fromm	7/25/2023	104
21	Dan Hakimzadeh	7/25/2023	105
22	Jesse Meyers	7/25/2023	106
23	Jeff Ricards	7/25/2023	107
24	Damon Smith	7/25/2023	108
25	Scott Hansen	7/26/2023	109
26	Justin Neuberg	7/26/2023	110
27	Donna Hein	7/27/2023	111
28	Tom Mauro	7/27/2023	112
29	Jimmy Piraino	7/28/2023	113

Number	Agency/Organization/Individual Name	Date	Page
30	Marshall Loewenstein	8/2/2023	114
31	Andrew Puricelli	8/2/2023	115
32	J. Rhode	8/2/2023	116
33	Trent Selbrede	8/2/2023	118
34	Tina Schmitz	8/3/2023	119
35	Nathan Craig	8/4/2023	120
36	Rolando Flores	8/4/2023	121
37	Ed Fowler	8/6/2023	122
38	M. Shane Hamman	8/6/2023	123
39	Maurice Pessot	8/6/2023	124
40	Andrew Weil	8/7/2023	125
41	Cynthia Planken	8/8/2023	126
42	John Holloway	8/9/2023	128
43	Gerry Krippner	8/16/2023	131
44	Daniel Pitard	8/17/2023	132
45	Kevin Loomis	8/18/2023	133
46	Stephen Pearlman	8/18/2023	136
47	Steven Cipriano	8/19/2023	138
48	Matthew Bartelt	8/20/2023	139
49	Winston Carter	8/20/2023	140
50	Dirk Copeland	8/20/2023	141
51	Pete Gonzalez	8/20/2023	142
52	John Gray	8/20/2023	143
53	James Kovaly	8/20/2023	144
54	Robert Leitner	8/20/2023	145
55	Darren Loher	8/20/2023	146
56	John Paterson	8/20/2023	147
57	Lou Pisacane	8/20/2023	149
58	Craig Radke	8/20/2023	150
59	Jeff Rucker	8/20/2023	151
60	Luke Towne	8/20/2023	152
61	Randy Wilbur	8/20/2023	153
62	Chris Zervas	8/20/2023	154
63	Matt Brooks	8/21/2023	155
64	Glen Gallo	8/21/2023	156
65	Ming Gao	8/21/2023	157
66	Seth Hanson	8/21/2023	158
67	Yan Huang	8/21/2023	165
68	George Hulley	8/21/2023	166
69	Scott Irwin	8/21/2023	167
70	Dan Jordan	8/21/2023	168
71	Edward Kallal	8/21/2023	169

Number	Agency/Organization/Individual Name	Date	Page
72	Mike Lowry	8/21/2023	170
73	Brian Nixon	8/21/2023	171
74	Robert Ponting	8/21/2023	172
75	Jacob Robertson	8/21/2023	173
76	Gary Siebenlist	8/21/2023	174
77	Evan Sollberger	8/21/2023	175
78	Steve Spletstoesser	8/21/2023	177
79	Ian Stenehjem	8/21/2023	178
80	Don Sutton	8/21/2023	179
81	Clark Weigand	8/21/2023	180
82	Jerry Wolfe	8/21/2023	181

Master Response

Several comments made on the Draft IS/MND raised similar issues. The following Master Response is provided to address those comments.

Master Response MR-1 (Trail Network Suggestions)

Several comments were received related to recommendations for changes to the Public Access Plan (PAP) trail network. The proposed PAP was developed through detailed analysis of opportunities and constraints, as well as extensive engagement with a wide variety of stakeholders between 2016 and 2023. This engagement included two public workshops, approximately 25 focused stakeholder meetings, and several coordination meetings with stakeholders and interested parties. DPR considered all public comments and recommendations during development of the conceptual trail alignments and trail map. DPR's goal was to utilize a fair planning approach that considers all user groups, including hikers, individuals with mobility limitations, mountain bikers, and equestrian groups, as well as provides for the protection of sensitive natural resources. A number of comments were received related to changing the proposed trail system, including preferences for inclusion, exclusion, or different routing of trail segments. The purpose of the environmental review process is to evaluate the environmental impacts of a project as proposed, and public review is intended to focus on the significance of environmental impacts, rather than to express preferences related to the elements of the project. As such, comments that address the adequacy of the analysis of environmental impacts from trail segments are addressed; however, comments that state a trail network preference but do not address the adequacy of the environmental analysis contained in the IS/MND are not germane to the environmental review process. No changes are required in response to these comments.

III. Comment Letters and Responses
Letter 1. California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



August 21, 2023

11-SD-67
PM 11.879

Sycamore Canyon/Goodan Ranch Preserve
Resource Management Plan Update
MND/SCH#2023070450

Ms. Emily Pacholski
Land Use/Environmental Planner
County of San Diego
5500 Overland Avenue, Suite 410
San Diego, CA 92123

Dear Ms. Pacholski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update located near State Route 67 (SR-67). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

We look forward to working with the County of San Diego in areas where the County of San Diego and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

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Response to Comment 1-a

Thank you for submitting a comment letter for County of San Diego Department of Parks and Recreation (DPR) consideration. This comment is an introductory statement. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)



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Caltrans has the following comments:

- (b) **Traffic Engineering and Analysis**
The SR-67 shoulders are for emergency use only and not for parking for access to trails. All pedestrians visiting the preserve trails should be encouraged to park at Goodan Ranch Staging Area parking or Rock and Roll trailhead parking, and not high-speed roadways and shoulders. Caltrans is concerned that visitors to the potential future trail connection #26 and proposed trail #29, will use SR-67 shoulders for parking. Should the potential and proposed trails, #26 and #29, be approved, parking along SR-67 will need to be prohibited. Place "No Parking Any Time" signs along the lanes beyond the edge of shoulder area to prevent vehicles parking along SR-67. Coordination with Caltrans would be needed for location of signage in State Right-of-Way (R/W).
- (c) **Hydrology and Drainage Studies**
Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed. Early coordination with Caltrans is recommended.
- (d) **Complete Streets and Mobility Network**
Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. A marked crosswalk on the north leg of Scripps Poway Parkway and SR-67 may be beneficial. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.
- To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.
- Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

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Response to Comment 1-b

This comment is related to visitors using State Route 67 (SR-67) shoulders for parking. DPR would continue to maintain the existing parking areas at the Goodan Ranch Staging Area and SR-67 Staging Area. The proposed project also proposes to formalize up to five parking spaces at the Rock and Roll Trailhead. DPR will provide signage within the Preserve boundaries to clearly mark parking locations and will encourage users to park in those areas. If potential trail connection 26 and proposed trail 29 are constructed, DPR will coordinate with the California Department of Transportation (Caltrans) as necessary to provide signage to prevent unauthorized parking along SR-67 shoulders. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 1-c

This comment is related to project modifications to drainage conditions and/or increase in runoff within Caltrans Right-of-Way. As described in Section X of the Initial Study, implementation of the proposed project is not anticipated to cause significant changes or ground disturbance that would alter the drainage patterns or amounts of runoff to on- or off-site areas. DPR will coordinate with Caltrans throughout development of the project for awareness. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 1-d

This comment is related to multi-modal mobility and suggests including a marked crosswalk on the north leg of Scripps Poway Parkway and SR-67. The proposed project addresses management of the County's Sycamore Canyon/Goodan Ranch Preserve (Preserve) and does not propose improvements at off-site locations, such as at the intersection of Scripps Poway Parkway and SR-67.



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Hauling/Traffic Control

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>.

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at SR-67/Scripps Poway Parkway, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage. Potential impacts to the highway facilities (SR-67) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-67.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements,

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DPR agrees that multi-modal improvements are important and looks forward to continuing to work with Caltrans to implement Complete Streets projects, outside of the context of the proposed project. Construction activities associated with the proposed project would not adversely affect bicycle, pedestrian, or public transit access; therefore, no mitigation to maintain such access is necessary. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 1-e

This comment is related to Caltrans' discretionary authority to issue a special permit to operate or move oversize/overweight vehicles. No oversize/overweight vehicles, detouring, closures, or traffic delays are anticipated on SR-67 or Scripps Poway Parkway due to implementation of the proposed project. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 1-f

This comment states that Caltrans is not responsible for existing or future traffic noise impacts associated with SR-67. DPR acknowledges this statement. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 1-g

This comment describes Caltrans' discretionary authority over work within Caltrans Right-of-Way. The proposed project includes improvements primarily on DPR property and outside of Caltrans Right-of-Way. If work is necessary within Caltrans Right-of-Way, DPR will coordinate with Caltrans on any permits necessary. No mitigation measures related to Caltrans facilities are necessary or proposed. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



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- (g) on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.
- Hazardous Waste**
The Hazards and Hazardous Materials (Section IX) portion of the Draft CEQA Initial Study attached to the Draft MND may not satisfy the requirements to evaluate and address hazardous waste impacts from the proposed project. Potential hazardous materials (i.e., naturally occurring asbestos [NOA] and aerially deposited lead [ADL]) exist within or adjacent to the Preserve, and if these hazardous materials are disturbed, they could potentially generate a hazardous waste requiring proper management and/or disposal.
- (h) A hazardous waste concern for this proposed project is aerially deposited lead (ADL)-contaminated soil along SR-67, where potential future trail connection #26 and proposed trail #29 connects to SR-67. Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is generally found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the surface. The Department of Toxic Substances (DTCS) sets regulatory thresholds for lead in soil, based on risk assessments performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHA). If soils are disturbed adjacent to SR-67, it is the Lead Agency's responsibility to comply with the DTSC ADL requirements for roadway soil management.
- (i) In addition, publicly available records indicate NOA may be present within the Preserve along proposed trails #22a and #22b of the #22 Rock and Roll Trail, northern proposed trail along the #14 Ridge Trail (located south of the 67 Staging Area), and the 67 Staging Area. See Attachment 1 for a map of the NOA rock unit mapped within the Preserve. It is recommended to conduct appropriate studies to evaluate this potential hazardous material.
- Right-of-Way**
Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- (j) Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final

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Response to Comment 1-h

This comment identifies the potential for hazardous materials impacts related to naturally occurring asbestos and aerially deposited lead. The proposed project would involve minimal grading, primarily to flatten the trails and staging areas, and would not require the export of soil. DPR would comply with all applicable hazardous materials regulations. Additional discussion has been added to the IS/MND (page 62) to further substantiate that no significant impacts related to aerially deposited lead, naturally occurring asbestos, or other hazardous materials would result from the proposed project.

Response to Comment 1-i

This comment is related to the potential presence of naturally occurring asbestos within the Preserve. Additional discussion has been added to the IS/MND (page 62) to further substantiate that no significant impacts related to naturally occurring asbestos or other hazardous materials would result from the proposed project.

Response to Comment 1-j

This comment is related to perpetuation of survey monuments if they are being destroyed by construction. The proposed project includes improvements primarily on DPR property and outside of Caltrans Right-of-Way. Construction activities related to the proposed project would be minimal and are not anticipated to result in impacts to any survey monuments. DPR notes that perpetuation of survey monuments by a licensed land surveyor would be required if survey monuments were to be destroyed by construction related to the proposed project. If work is necessary within Caltrans Right-of-Way, DPR will coordinate with Caltrans on any permits necessary. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



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August 21, 2023
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↑
(j) environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

(k) If you have any questions or concerns, please contact Sandy Vazquez, LDR Coordinator, at (619) 987-3580 or by e-mail sent to Sandra.Vazquezdot.ca.gov.

Sincerely,

Kimberly Dodson for

MAURICE A. EATON
Branch Chief
Local Development Review

Response to Comment 1-k

This comment is a concluding statement. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

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Letter 2. U.S. Fish and Wildlife Service and California Department of Fish and Wildlife



U.S. FISH AND WILDLIFE SERVICE
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF
FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, California 92123

In Reply Refer to:
23-0119814_CEQA-TA_SD

August 22, 2023
Sent Electronically

Emily Pacholski
Land Use/Environmental Planner
County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, California 92123
Emily.Pacholski@sdcounty.ca.gov

Subject: Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update
Project, Initial Study/Mitigated Negative Declaration (IS/MND), SCH# 2023070450

Dear Emily Pacholski:

The U.S. Fish and Wildlife Service (Service) and California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) and associated documents for the proposed Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan (RMP) Update (Project). The comments provided in this letter are based on information provided in the IS/MND and RMP; meetings and correspondence between the Wildlife Agencies and the County staff; our knowledge of sensitive and declining species and their habitats in the region; and our participation in regional conservation planning efforts, including the County of San Diego's Subregional Multiple Species Conservation Program (MSCP).

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

The Department is a Trustee Agency with jurisdiction over natural resources affected by the project [California Environmental Quality Act (CEQA) Guidelines §15386] and is a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code §2050 *et seq.*) and Fish and Game Code Section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The County participates in the NCCP program through implementation of their MSCP Subarea Plan (SAP). The Preserve is located within the

Response to Comment 2-a

Thank you for submitting a comment letter for DPR's consideration. This comment is an introductory statement. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)



Emily Pacholski (23-0119814_CEQA-TA_SD)

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(a)

boundaries of the County's SAP and was included in the SAP based on the site's high biological resource value. The Preserve RMP provides management directives pursuant to the County's SAP, Framework Management Plan, and Implementing Agreement, which specify that the County is responsible for managing lands that it owns or acquires within the MSCP Preserve system.

The Preserve is just northeast of the Marine Corps Air Station (MCAS) Miramar, north of Santee, and southeast of Poway within the unincorporated community of Lakeside in the County of San Diego. Per the Initial Study (IS), the habitat types that occur in the survey area include scrub oak chaparral, southern riparian forest, southern coast live oak riparian forest, southern riparian woodland, unvegetated channel, dense coast live oak woodland, open coast live oak woodland, Diegan coastal sage scrub, coastal sage-chaparral transition, southern mixed chaparral, chamise chaparral, and non-native grassland.

(b)

The proposed Project is an update to the County's 2013 Resource Management Plan (RMP County 2013) for the Sycamore Canyon/Goodan Ranch County Preserve. The RMP is a guidance document for the management of the biological and cultural resources within the Preserve as well as public access and recreation. The Project also includes the Public Access Plan (PAP) and an update to the Preserve's Vegetation Management Plan (VMP), which serve as supporting documents to the RMP. The VMP describes the current conditions within the Preserve and provides recommendations for habitat restoration, invasive plant species management, and fire management. The PAP is a planning document for the Preserve's multi-use trail system. The proposed activities and changes under the PAP include retention of existing trails, rerouting or modifications to existing trails, the formal addition of new trails, and restoration of some informal trails or existing impacted areas that were not originally part of the trail system. The implementation of the proposed Project's PAP component would result in 15 miles of trails dedicated to multi-use routes for hiking, mountain biking, horseback riding, and electric bike (e-bike) use. The trail system would include 3.78 miles of new trails, 0.99 mile of potential future trail connections, 4.76 miles of formalization of trails in existing disturbed areas, and 5.56 miles of existing formal trails, resulting in the increase of the trail network in the Preserve to 15.09 miles. According to the IS/MND, the PAP also includes recommendations for potential future trail connections that could link trails within the Preserve to future connections outside the Preserve, should those outside connections become publicly accessible in the future.

The Project site supports several sensitive wildlife species within the Preserve. A total of four special-status wildlife species were detected on or within 500 feet of the survey area during the 2019-2022 surveys including the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*; Quino) and threatened coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher). Additionally, there has been 40 other special-status species documented within or adjacent to the study area during previous surveys for the Preserve (see Figure 8a, 8b, and 8c in BRTR). The Project site also supports a variety of sensitive plant species including but not limited to four MSCP narrow endemic species: San Diego thormmint (*Acanthomintha ilicifolia*), willow monardella (*Monardella viminea*), variegated dudleya (*Dudleya variegata*), and San Diego goldenstar (*Bloomeria clevelandii*).

Response to Comment 2-b

The summary of the proposed project and the sensitive wildlife species within the Preserve provided in this comment are consistent with the information provided in the IS/MND. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Emily Pacholski (23-0119814_CEQA-TA_SD)

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(b)

The Wildlife Agencies offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources and to ensure the Project is consistent with the County's MSCP SAP.

- 1.) Connecting Trail Segments to Unauthorized Trails Outside the Preserve: The IS/MND identifies the Scripps Poway Parkway tunnel as a potential future trail connection. We disagree that this is an appropriate connection.

The Scripps Poway Parkway tunnel is a wildlife tunnel installed per the Scripps Poway Parkway (SPP) Extension Project Environmental Impact Report, which stipulated that public use of the tunnel will be restricted to limited use by equestrians to protect the undercrossing for its intended use as a corridor for wildlife movement. The tunnel is critical to maintaining wildlife connectivity within this Biological Resource Core Area (BRCA), which is identified in the MSCP Subregional Plan. Currently, this wildlife tunnel is the only opportunity for non-avian wildlife to move safely north-south across the parkway. Movement to the east is restricted by Highway 67, while secondary roads fragment other portions of the BRCA.

(c)

Due to the tunnel's importance for wildlife movement, it has been incorporated into research on regional wildlife movement. The San Diego County Tracking Team (SDCTT) has been collecting data on wildlife use of the tunnel for many years. A non-authorized user-created trail currently exists through the tunnel and is increasing in popularity. SDCTT data indicates that as human use (non-authorized) of the tunnel (both during the day and at night) has increased, use by wildlife has markedly decreased. The SDCTT performed a transect survey in May 2022 and found that 99.9% of the tunnel was covered in mountain bike tracks. Per Table 8-2 (Covered Species Analysis), in the City of Poway's HCP/NCCP, "A species is considered adequately conserved if sufficient habitat or populations within Poway are conserved, along with sufficient habitat linkages, movement corridors, or other special requirements." Ongoing and increased use of the Scripps Poway Parkway tunnel that would result from the proposed connection is inconsistent with the Poway Subarea HCP/NCCP and would negatively impact covered species that inhabit the City's open spaces.

The Wildlife Agencies have expressed to the City of Poway that recreation, other than limited use by equestrians, is not permitted within the tunnel (CDFW SPPE Letter, June 28, 2022). Connection to this tunnel, even with signage designating restricted use as proposed in the PAP, is highly likely to result in increased degradation of the intended ecological function of the tunnel and further constrict north-south wildlife connectivity. We request that the County remove any new trail alignment or segment that connects to the tunnel from the PAP and RMP.

(d)

- 2.) Allowing the Use of Electric Bikes (e-bikes) on the Preserve: Per the IS/MND, the County is proposing to allow e-bikes throughout the multi-use trails in the Preserve. It also states that e-bikes are a passive form of recreation, and passive recreation is generally compatible with the MSCP. The Wildlife Agencies acknowledge that passive recreation is generally an accepted compatible use within the MSCP Preserve. However, the ecological impacts from the use of

Response to Comment 2-c

This comment states that the Scripps Poway Parkway tunnel is a wildlife tunnel restricted to use as a wildlife corridor and is not an appropriate future trail connection. The proposed project's PAP identifies South Raptor Loop Northwest (Trail 4) as a potential future trail connection which leads to the Scripps Poway Parkway tunnel. As noted in the PAP, this trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway, in coordination with the wildlife agencies. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Until and unless legal access is available, DPR would use signage and barriers, as appropriate, to prohibit access. No changes to the IS/MND are warranted.

Response to Comment 2-d

This comment expresses concerns regarding the use of e-bikes in the Preserve and recommends further coordination to develop an approach for authorized access that protects biological resources. Use of Class 1 and Class 2 e-bikes is currently allowed within the Preserve, consistent with DPR Policy C-50: E-Bike Use in Parks, Preserves, Trails, and Pathways. Additionally, per State Assembly Bill 1096, Class 1 and 2 e-bikes that are less than 750 watts/20 miles per hour (mph) use limit are non-motorized bicycles that may go wherever a bicycle can go, unless there is a specific ordinance restricting their use. These types of bicycles must have a classification number label that is permanently affixed to the bike in a prominent location, as required by the State of California. More recently, State Assembly Bill 1909, passed in September 2022, states that Class 3 e-bikes that are less than 750 watts/28 mph use limit are non-motorized bicycles that may go where a bicycle can go, unless there is a specific ordinance restricting their use.



DPR policy considers use of Class 1 and 2 e-bikes to be passive recreation and prohibits the use of Class 3 e-bikes on County trails. This policy is consistent with the State of California's definition of bicycles and is reflective of DPR's commitment to balancing the needs of conservation with public access. As indicated in the brochure for the Preserve, the speed limit for all bicycles is 10 miles per hour. The ongoing use of Class 1 and Class 2 e-bikes is consistent with current policy and has been identified in the proposed project's PAP to provide continued accessibility to the Preserve by the public. As Class 1 and Class 2 e-bikes are currently allowed, their use would not reflect a change from existing conditions that would result in additional environmental impacts.

DPR will continue to enforce Preserve regulations and patrol unauthorized access. Potential degradation would be addressed as necessary through adaptive management as provided for by the Resource Management Plan (RMP). For example, Implementation Measure C.5.1 provides that DPR will monitor trails for degradation and provide necessary repair and maintenance. Implementation Measure C.5.3 provides that DPR will restore degraded habitats and reduce detrimental edge effects through maintenance and stabilization of trails and strategic revegetation; Implementation Measure C.5.4 provides that DPR staff will employ barriers and signage in areas where unauthorized trail formation is observed, and potentially deconstruct and restore unauthorized trails; and Implementation Measure B.2.1 provides that DPR staff will implement the treatment and removal of high- and moderate-priority invasive non-native plants. No changes to the IS/MND are warranted.



Emily Pacholski (23-0119814_CEQA-TA_SD)

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(d)

e-bikes differs greatly from traditional mountain biking. One study equates use of e-bikes as comparable to amplified and intensified mountain bike use (Kuwaczka et. al. 2023). Areas previously less attainable from traditional mountain biking become much more easily reachable with the assisted use of e-bikes, thereby increasing expected spatial use of the Preserve. Furthermore, e-bike use also increases the frequency of human disturbance due to the increased speed of the e-bikes themselves and due to increased human presence. Use of e-bikes are likely to lead to changes in habitat use by sensitive species, alter diurnal activity patterns of wildlife, result in excess soil compaction and erosion, promote nonnative seed dispersal, and therefore may result in direct, indirect, and cumulative impacts to the numerous sensitive species within the Preserve. Further, the use of e-bikes in combination with the proposed increase in authorized trails would result in impacts to covered species beyond those anticipated from passive recreation within the Preserve and create the potential for additional unauthorized access, with its associated effects on sensitive biological resources (Dertien et al. 2018, Lucas 2020). Therefore, the Wildlife Agencies do not support allowing e-bikes in the Preserve and recommend further discussion and coordination with the County to develop an approach for authorized access that will protect the biological resources within the Preserve.

(e)

- 3.) **Impacts to San Diego Thornmint:** San Diego thornmint is a Federally Threatened, State Endangered, County List A and CRPR 1.B.1 species. It is found throughout the Preserve, and it occurs within the survey area for both the proposed trail segments through existing disturbed areas and the proposed re-route of the Rock and Roll Trail segment.

San Diego thornmint is a narrow endemic under the SAP and should be avoided in all aspects of the proposed Project. In areas with existing trails where San Diego thornmint occurs or is adjacent to those trails, fencing and signage should be installed to protect those plants. In areas where new trail segments are proposed and San Diego thornmint is present, we recommend relocating those trails to avoid the species, and provide a minimum buffer of 25 feet between the trail and San Diego thornmint when possible, to ensure that indirect impacts are also avoided. If a 25-foot buffer is not possible, no less than a 10-foot buffer should be provided, along with fencing and signage, at the edge of the trail where it occurs in proximity to San Diego thornmint.

(f)

- 4.) **Impacts to Quino Checkerspot Butterfly:** Quino checkerspot butterfly is a federally endangered species that is not covered under the County's plan. Quino is present within the Preserve, and the Rock and Roll Trail (#22) segment contains suitable Quino habitat. The Wildlife Agencies appreciate the proposed avoidance measures; however, we also recommend that protocol surveys be conducted during the flight season prior to construction. If Quino are detected during protocol surveys, and complete avoidance of the occupied habitat is not feasible, please coordinate with the Service to address potential impacts and permitting needs under the federal Endangered Species Act. Also, please note that Quino has previously been proposed for listing under the California Endangered Species Act (CESA); therefore, permitting by CDFW may also be necessary in the future.

Response to Comment 2-e

This comment includes recommendations for avoiding impacts to San Diego thorn-mint. DPR acknowledges the importance of protecting San Diego thornmint. With regard to protection of thornmint populations adjacent to existing trails, the RMP includes Management Directive C.4.2, which requires that points of unauthorized access and sensitive species impacts continue to be identified through monitoring activities, and Management Directive C.4.1, which provides that fences, gates, and/or signage be installed as necessary in such areas. Mitigation Measure MM-BIO-1 prioritizes avoidance of thornmint during construction of the Rock and Roll Trail (Trail 22), but allows for potential impacts in accordance with the requirements of the County's Biological Mitigation Ordinance (BMO). In response to this comment, MM-BIO-1 (page 34) has been revised to provide a buffer of 25 feet where feasible along with fencing and signage.

Response to Comment 2-f

This comment includes a recommendation to conduct protocol surveys for Quino checkerspot butterfly (QCB) during the flight season prior to construction and notes that MM-BIO-9 provides a number of conservation elements for the species. These measures include conducting QCB host plant mapping prior to construction when host plants are blooming, avoiding direct impacts to host plants as much as possible, prohibiting construction within mapped QCB host plant patches during the QCB flight season, and monitoring by a qualified biologist during construction. DPR will continue coordination with wildlife agencies throughout the proposed project process and share results of host plant mapping for consideration and coordination ahead of construction. In particular, it is acknowledged that protocol surveys for QCB and/or specific coordination with U.S. Fish and Wildlife Service (USFWS) and potentially the California Department of Fish and Wildlife (CDFW) may be necessary if complete avoidance of QCB host plants is not feasible. No changes to the IS/MND are warranted.



Emily Pacholski (23-0119814_CEQA-TA_SD)

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(g)

5.) Trail Designation and Signage: We recommend that the BRTR state explicitly that signage will be added throughout the Preserve to designate the trail segment changes. The Project includes several changes to the trail system, including the creation of new trails, the connection of existing trails, the formalization of informal trails, and closure of existing trails. Because the Project area supports several sensitive species, new signage throughout the trail system to prevent encroachment into biologically sensitive areas may help to minimize impacts to sensitive species. Furthermore, we recommend that any closed trails are physically blocked using effective barriers, as signage alone is typically insufficient to prevent encroachment. The RMP should also require monitoring of closed trails to ensure that habitat recovers as intended.

(h)

6.) Temporal Restrictions for Recreational Use. Wildlife exhibit avoidance behavior in response to human recreational disturbance, both spatially and temporally (Patten et al. 2017). To minimize impacts from recreational disturbance to sensitive wildlife, temporal restrictions may be necessary to restrict certain recreational uses during times of the day when sensitive species are most active (Lucas 2020). To protect the sensitive species within the Preserve, we recommend including a measure discussing temporal restrictions, where appropriate, within the Project area.

The following comments (7, 8, and 9) are specific to the Department:

(i)

7.) Possible Impacts to Crotch's Bumble Bee (*Bombus crotchii*; CESA-candidate): Based on nearby detections of Crotch's bumble bee and the presence of suitable habitat on the Preserve, there is a potential for Crotch's bumble bee and its habitat to be impacted by Project activities. Currently, Crotch's bumble bee is a candidate under the California Endangered Species Act (CESA) and is not covered by the South County MSCP SAP. Construction of the proposed trail alignments and the management activities described in the updated RMP may cause direct mortality to Crotch's bumble bee, or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success. Crotch's bumble bee is far-ranging, as they are generalist foragers and can utilize many different plant and vegetation communities. Suitable habitats present within the study area include but are not limited to grasslands, coastal sage scrub, and chaparral with requisite floral resources for nectaring, as well as small mammal burrows which provide potential nest sites.

The Department recommends that a qualified biologist conduct surveys for this candidate species within the Project area during the bumble bee's flight period (March 1st through mid-October; Thorpe et al. 1983). The Department requests that the County work with Department staff to develop an appropriate survey protocol, using the latest available survey guidance from CDFW (Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species). Once Project activities with the potential to impact Crotch's bumble bee begin, we recommend a qualified biologist monitor potential nest sites and floral resources for Crotch's bumble bee and record any observations using photographs and GPS points to report to the California Natural Diversity Database (CNDDB). If the species is detected and take may occur, the qualified biologist shall notify the Department immediately to avoid take and ensure compliance with CESA.

Response to Comment 2-g

This comment relates to signage to designate the trail segment changes. The proposed project would be subject to DPR standard operating procedures, which are implemented at all County-owned parks and facilities. The proposed project would implement the RMP, which identifies Management Directives that relate to the management of the Preserve's operations. Indirect operational effects would be covered through the implementation of Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element. These management directives require signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access (Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary/permanent trail closures, and educational panels and displays providing information about the surrounding ecosystem. Page 6 of the IS/MND and page 5 of the BRTR contain the following information regarding signage and barriers: "Additional barriers would be necessary for prevention of access to unauthorized trails, temporary closures due to unsafe conditions, and prevention of vehicular access. Signage would be provided to provide direction and orientation to visitors, display rules and regulations posted at staging areas and access points, provide educational information, and mark trails." The RMP Management Directive C.5 – Properly maintain access roads and trails for user safety, and to protect natural and cultural resources, contains Implementation Measure C.5.2, which states that DPR rangers would increase patrols of closed trails and determine whether barriers are effective. Additionally, Implementation Measure C.5.4 states that DPR rangers may also deconstruct and restore unauthorized trails. Restoration of unauthorized trails may include removal of invasive non-native plants, decompaction of soil, installation of native plants, placement of clear signage, and monitoring of the restoration at regular intervals to ensure the areas are properly restored and native vegetation acts as a natural barrier to access. The comment does not address the adequacy of the IS/MND and no change to the document is warranted.



Response to Comment 2-h

The proposed project does not propose changes to the current operating hours of the Preserve, which is open to pedestrians from sunrise to sunset. The Goodan Ranch Staging area is open from 8 am to 7 pm April through September and from 8 am to 5 pm October through March. The SR-67 Staging Area is open from 8 am to 5 pm year-round. The proposed project would not result in a change from existing conditions related to temporal restrictions that would result in additional environmental impacts. DPR will continue to enforce Preserve regulations and patrol unauthorized access. Implementation Measure C.4.1 states that DPR rangers may install fencing, gates, and/or signage at points of unauthorized public access. Additionally, implementation Measure C.5.1 provides that DPR will monitor trails for degradation and provide necessary repair and maintenance and Implementation Measure C.5.2 provides for temporary trail closures (including to address sensitive biological resource impacts), accompanied by educational support and public notification through signs and public meeting announcements. The comment does not address the adequacy of the IS/MND and no changes to the document are warranted.



Response to Comment 2-i

This comment includes a recommendation to conduct surveys for Crotch's bumble bee during the flight period prior to construction. Crotch's bumble bee is currently a candidate species for listing under the California Endangered Species Act (CESA). As such, the information below and within the IS/MND is based on the available guidance for the species and discussions with CDFW to date. Crotch's bumble bee was not observed during the 2019-2022 surveys of the Preserve, but the species was observed on private property outside of the Preserve in 2023. While some suitable open grassland and scrub habitat occurs within the Preserve, these areas occur outside the proposed trails and trail improvements. No suitable burrows were observed within the impact area. DPR will complete appropriate surveys and continue to coordinate with CDFW to ensure appropriate protection of this species as further guidelines are developed. As requested in the comment letter and based on guidance received during coordination with CDFW, page 32 of the IS/MND has been revised to specify that DPR will have a biological monitor present prior to and during construction activities, as determined appropriate by a qualified biologist. If Crotch's bumble bee is observed and there is a potential for impact to the species from project activities, DPR will coordinate with CDFW on protection of the species.



Emily Pacholski (23-0119814_CEQA-TA_SD)

6

(j)

The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the County's MND for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the County's document should fully identify the potential impacts to any stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA. Whether an LSAA is required to satisfy the requirements of section 1600 *et seq.* can only be determined at the time a formal Notification package is submitted to the Department. If any proposed trail segments impact drainages or channels that include associated riparian resources, we strongly encourage the County to consider submitting a streambed notification package to the Lake and Streambed Alteration Program.

(k)

8.) CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be found online at [Submitting Data to the CNDDDB \(ca.gov\)](https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data)¹.

(l)

9.) The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the fee is required for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

(m)

We appreciate the opportunity to comment on the IS/MND and look forward to our continued collaboration in implementing the County's MSCP SAP. If you have questions or comments regarding this letter, please contact [Emily Gray](mailto:Emily.Gray@wildlife.ca.gov)² of the Department or [James Molden](mailto:James.Molden@fws.gov)³ of the Service.

¹<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

² Emily.gray@wildlife.ca.gov

³ James_molden@fws.gov

Response to Comment 2-j

This comment states that CDFW has regulatory authority over impacts to streams and/or lakes. DPR acknowledges that CDFW has regulatory authority and would require a Lake and Streambed Alteration Agreement if impacts to streams and/or lakes were to occur. The proposed project does not propose improvements that would result in such impacts. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 2-k

This comment requests that information in the IS/MND be incorporated into the California Natural Diversity Database. Findings have been entered into the California Natural Diversity Database as requested. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 2-l

This comment requests that information in the IS/MND be incorporated into the California Natural Diversity Database. Findings have been entered into the California Natural Diversity Database as requested. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 2-m

This comment requests that information in the IS/MND be incorporated into the California Natural Diversity Database. Findings have been entered into the California Natural Diversity Database as requested. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.




Emily Pacholski (23-0119814_CEQA-TA_SD)

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Sincerely,

JONATHAN SNYDER
Digitally signed by
JONATHAN SNYDER
Date: 2023.08.22
15:51:00 -0700
Jonathan D. Snyder
Assistant Field Supervisor
U.S. Fish and Wildlife Service


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

Enclosure

cc:
[Melanie Burlaza](#),⁴ CDFW
[Jonathan D. Snyder](#),⁵ Service
[Susan Wynn](#),⁶ Service
[Robert Manis](#),⁷ City of Poway

⁴ Melanie.burlaza@wildlife.ca.gov
⁵ Jonathan_D_Snyder@fws.gov
⁶ Susan_Wynn@fws.gov
⁷ bmanis@poway.org



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 28, 2022

Mr. David De Vries
City Planner
City of Poway
13325 Civic Center Drive
Poway, CA 92064
DDeVries@poway.org

Dear Mr. De Vries:

The California Department of Fish and Wildlife (CDFW) and the City of Poway (City) exchanged several emails in May 2021 concerning the recording of conservation easements over 650 acres of mitigation parcels for the Scripps Poway Parkway Extension (SPPE). The recordation of these easements was part of the obligation of the City's Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) and inclusion of these parcels in the overall preserve system was necessary to mitigate for SPPE impacts. CDFW initiated a thorough investigation to find any documentation on the conservation easements. Unable to find anything, CDFW began the process of recording the conservation easements. CDFW asked the City for permission to perform visual inspections of the mitigation parcels as part of the recordation process (email dated May 3, 2021) and was denied by Mr. David De Vries on May 24, 2021 (email). Mr. De Vries stated that the City met its obligations per a March 1, 1995, letter from CDFW and that the City's position is "that the visual inspection would've been required 25+ years ago when the properties were purchased and, as such, there are no longer obligations for this visual inspection." At the 2020 Annual Meeting with the City and the United States Fish and Wildlife Service on August 5, 2021, the City stated they would not be pursuing conservation easements over the mitigation parcels and their legal team agreed that were no longer necessary.

While the March 1, 1995, letter from CDFW to the City does read that the City was told it met its mitigation obligations, this is only in reference to the purchase of the mitigation parcels. CDFW's South Coast Region has coordinated with CDFW's Office of General Counsel, reviewing all the SPPE documents, including the City's HCP/NCCP, and determined that the City is still obligated to record the conservation easements. Mitigation for the SPPE was a major obligation of the City's HCP/NCCP and page 14 of the HCP/NCCP Implementing Agreement (IA) states that "The conservation easement, in a form to be approved by CDFG and USFWS, shall identify the CDFG and USFWS as co-beneficiaries of the easement with authority to enforce each of its provisions. Concurrent with the adoption of the General Plan Amendment the City will initiate the establishment of a permanent biological open space easement over 650 acres of land acquired as habitat mitigation in connection with the approved Scripps-Poway Parkway Extension Project as discussed in detail in Section 5.4 of the PSHCP." Exhibit A of Resolution 95-06 from August 15, 1995, states that "The City shall execute the above described conservation easements in favor of the U.S. Fish and Wildlife Service and California Department of Fish and Game provided for the perpetual conservation of the subject SPPE compensation mitigation lands and City-owned OS-RM cornerstone lands for the protection of natural biological resources, including the Covered Species, pursuant to and consistent with the Poway Subarea HCP and companion IA."

Conserving California's Wildlife Since 1870



Response to Comment 2-n

This comment summarizes coordination history between CDFW and the City of Poway and mentions continuing to discuss recording conservation easements and managing the wildlife tunnel for its intended use as an important wildlife corridor. DPR acknowledges receipt of this letter submitted in support of comment 2(c). Please refer to response to comment 2(c). The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



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David DeVries
City of Poway
June 28, 2022
Page 2 of 2

The mitigation parcels provide important open space for the continued ecological functioning of the covered species within the City's HCP/NCCP. With the conservation easements recorded, management terms would be in place for the protection of habitat and wildlife. If activities on the parcels are outside of these terms, then the ability of the covered species to thrive is jeopardized and therefore the ability of CDFW to provide take authorization through the City's HCP/NCCP is compromised. Another mitigation requirement per the SPPE's Environmental Impact Report was the installation of a wildlife tunnel which stipulated only limited use by equestrians was allowed. This tunnel is critical in maintaining wildlife connectivity within a Core Biological Resource Area (CBRA), which is identified in the Multiple Species Conservation Program Subregional Plan. Currently, this wildlife tunnel is the only opportunity that non-avian wildlife has to move safely north-south through this CBRA. Movement to the east is restricted by Highway 67, while secondary roads fragment other portions of the CBRA. The conservation easements that would cover the mitigation parcels on both sides of the wildlife tunnel would protect the undercrossing for its intended use as a corridor for migrating wildlife.

Due to the tunnel's importance for wildlife movement, it has been incorporated into research on regional wildlife movement. The San Diego County Tracking Team (SDCTT) has been collecting data on wildlife use of the tunnel for many years. A non-authorized user-created trail currently exists through the tunnel and is increasing in popularity, traversing the mitigation parcels on either side of the SPPE. SDCTT data indicates that as human use (non-authorized) of the tunnel (both during the day and at night) has increased, use by wildlife has markedly decreased. The SDCTT performed a transect survey this month (May 2022) and found that 99.9% of the tunnel was covered in mountain bike tracks. Per Table 8-2 (Covered Species Analysis) in the City's HCP/NCCP, it states that "A species is considered adequately conserved if sufficient habitat or populations within Poway are conserved, along with sufficient habitat linkages, movement corridors, or other special requirements." The refusal of the City to follow through with recording the conservation easements over the SPPE mitigation parcels and not managing the wildlife corridor for its intended use potentially jeopardizes the continued existence of those covered species that inhabit the City's open spaces, along with contradicting the language in the HCP/NCCP that requires their protection.

We appreciate the opportunity to continue CDFW's discussion with the City over recording the conservation easements and managing the wildlife tunnel for its intended use as an important wildlife corridor. Questions regarding this letter or further coordination should be directed to David Mayer, Environmental Program Manager at (858) 204-8774 or David.Mayer@wildlife.ca.gov.

Sincerely,

DocuSigned by:

David Mayer

D700B4520375408...

David Mayer
Environmental Program Manager
South Coast Region

cc: Karen Drewe, CDFW – Karen.Drewe@wildlife.ca.gov
Jonathan Snyder, USFWS – Jonathan.D.Snyder@fws.gov
Austin Silva, City of Poway – ASilva@poway.org
Robert Manis, City of Poway – RManis@poway.org



Letter 3. San Diego Mountain Biking Association



August 21, 2023

County of San Diego
% Emily Pacholski
5500 Overland Ave. Ste. 410
San Diego, CA 92123
Sent to: CountyParksCEQA@sdcounty.ca.gov

RE: Comments on the DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan

Dear Ms. Pacholski:

On behalf of the San Diego Mountain Biking Association, we express our support for the DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan.

This plan develops sustainable public access, improved infrastructure, and trail opportunities that provide an enjoyable experience for all trail users. We are pleased to see that the plan has adopted some modern trail management and design techniques such as directional trails and stacked loop systems. The Framework Management Plan and Management Directives on page 3 of the Resource Management Plan states that passive recreation will be allowed within the preserve, and we are pleased to see that Mountain Biking is included in that definition; under specified conditions and locations as stated within the plan. As a non-profit that is dedicated to maintaining and improving sustainable trail access for mountain biking in San Diego, we continue to maintain that mountain biking is human powered and passive recreation.

The County has a long history of success with enforcement and biological monitoring, and we believe this plan is supportive of both the recreation activities that are popular and in demand while protecting and maintaining fragile ecosystems. The conservation of natural, cultural and historical resources is important for current and future generations of users to enjoy and learn about the varying types of terrain and unique habitats that are found within the preserve.

SDMBA.com
PO Box 881491, San Diego, CA 92168

Response to Comment 3-a

The County appreciates the comment submitted on the Draft IS/ MND as well as the commenter's support of the proposed project. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)





(a)

Another important part of this plan is the careful consideration of crucial trail connections on adjacent properties including connections for the Trans-County Trail. The Public Access Plan contains high value connectivity between neighboring regions who support these trail connections such as the City of San Diego, City of Poway, City of Santee and other unincorporated parts of the County. These connections are consistent with not only the County's Trails Master Plan, but neighboring Cities long term trail area plans. The adoption of historic existing trails is important to the recreation community that has witnessed the conservation and planning resources that the County has invested in this area. This Resource Management Plan will help reach the goals of the County's MSCP Subarea Plan and Framework Management Plan which include providing high quality recreation settings, experiences and facilities, while also protecting the area's unique scenic attributes and ecosystems.

The San Diego Mountain Biking Association is enthusiastic to write this letter of support for the DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan. As recreation on public lands becomes more and more popular amongst the general population, it is important that well rounded design and management plans like these are adopted.

SDMBA continues to support the County's effort to conserve land and resources while fostering stewardship and providing recreation opportunities for the public for these important ecosystems.

Sincerely,

A handwritten signature in blue ink that reads "Susie Murphy".

Susie Murphy, Executive Director
executivedirector@sdmba.com
San Diego Mountain Biking Association

SDMBA.com
PO Box 881491, San Diego, CA 92168



Letter 4. San Diego Mountain Biking Association, California Mountain Biking Coalition, Latino Outdoors, San Diego Trail Alliance, Lakeside Frontier Riders, Backcountry Horsemen of San Diego, San Diego Ultra Running Friends, Allied Climbers of San Diego, and Tijuana River Valley Equestrian Association



August 21, 2023

County of San Diego
% Emily Pacholski
5500 Overland Ave. Ste. 410
San Diego, CA 92123
Sent to: CountyParksCEQA@sdcounty.ca.gov

RE: Comments on the DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan

Dear Ms. Pacholski:

On behalf of the San Diego Mountain Biking Association, we express our support for the DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan.

This plan develops sustainable public access, improved infrastructure, and trail opportunities that provide an enjoyable experience for all trail users. We are pleased to see that the plan has adopted some modern trail management and design techniques such as directional trails and stacked loop systems. The Framework Management Plan and Management Directives on page 3 of the Resource Management Plan states that passive recreation will be allowed within the preserve, and we are pleased to see that Mountain Biking is included in that definition; under specified conditions and locations as stated within the plan. As a non-profit that is dedicated to maintaining and improving sustainable trail access for mountain biking in San Diego, we continue to maintain that mountain biking is human powered and passive recreation.

The County has a long history of success with enforcement and biological monitoring, and we believe this plan is supportive of both the recreation activities that are popular and in demand while protecting and maintaining fragile ecosystems. The conservation of natural, cultural and historical resources is important for current and future generations of users to enjoy and learn about the varying types of terrain and unique habitats that are found within the preserve.

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Response to Comment 4-a

The County appreciates the comment submitted on the Draft IS/ MND as well as the commenter's support of the proposed project. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)





California Mountain Biking Coalition
Michael Anzalone



Latino Outdoors
Gibram Sanchez - LO Leader



San Diego Trail Alliance
Cyndi Denny



Lakeside Frontier Riders
Cyndi Denny, Trail Liaison



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San Diego Ultra Running Friends
Jeff Hooker, President



Allied Climbers of San Diego
Josh Higgins, CEO Allied Climbers of San Diego



Tijuana River Valley Equestrian Association
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Letter 5. San Diego Wildlife and Habitat Conservation Coalition

San Diego Wildlife and Habitat Conservation Coalition
Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.

August 21, 2023

Emily Pacholski, Project Manager
County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123-1239

Only via email to CountyParksCEQA@sdcounty.ca.gov

Subject: Comments on the Draft IS/MND for the Sycamore Canyon/Goodan Ranch Preserve RMP Update

Dear Ms. Pacholski:

(a) The undersigned members of the San Diego Wildlife and Habitat Conservation Coalition (WHCC) offer the following comments on (a) the Draft Initial Study and Mitigated Negative Declaration (IS/MND) for the Update of the Resource Management Plan (RMP) for the Sycamore Canyon/Goodan Ranch Preserve (Preserve), and (b) the RMP itself. We appreciate the opportunity to provide these comments, which were prepared by members who have extensive professional experience with park management, conservation plans, and CEQA review.

(b) The WHCC submitted comment letters in 2018 and 2019 on the Public Access Plan (PAP) for the Preserve; the PAP too is now being updated as a component of the RMP Update. We also attended several meetings with the County Department of Parks and Recreation (DPR) to discuss revisions and biological improvements to the PAP to achieve a better balance with the goals of the Subregional and Subarea Multiple Species Conservation Program (MSCP) Plans. It appears our suggestions about the trails were largely dismissed. While this letter refines some of our positions on the PAP, we have attached the previous WHCC letters to enter them into the CEQA public record; the letters are attached to the end of this letter's attachments.

Summary of Main Comments

(c) We use the term "the documents" to refer collectively to the documentation we reviewed, including the biological sections of the IS/MND and their appendices, and parts of the RMP, PAP, TMP, CTMP, FMP, BMO, and PTG.

(d) S1. Many of the determinations of Less Than Significant with Mitigation Incorporated for Biological Impacts are not adequately supported.

(e) S2. Some of the proposed trails, particularly those in the northern parcels and Trail 22, do not conform with the MSCP requirement to avoid sensitive resources. Proposed Trail 4 inappropriately leads to parcels between the Preserve boundary and the Scripps Poway Parkway wildlife tunnel.



Response to Comment 5-a

The County appreciates the comment submitted on the Draft IS/MND. This comment is an introductory statement. Please note that the public review process specifically addresses the IS/MND; therefore, all comments are addressed to the extent that they relate to the adequacy of the IS/MND. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 5-b

This comment refers to comments submitted by the San Diego Wildlife and Habitat Conservation Coalition in 2018 and 2019 on the PAP and expresses a belief that that their suggestions were largely dismissed. Previous comments received on the PAP are acknowledged. Please refer to MR-1 regarding suggestions for revised trail designs and to response to comment 5(cccc) regarding the attached documents. No changes to the IS/MND are warranted.

Response to Comment 5-c

This comment states that their use of "the documents" refers to all of the documentation reviewed for the project. The commenter's use of the term "the documents" is noted. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 5-d

The commenter expresses concern regarding the biological impact conclusions contained in the IS/MND. This concern is acknowledged. This is a general statement; specific concerns are addressed in subsequent comments.



- (f) S3. The IS/MND and the supporting documents are seriously deficient in their treatment of the project's operational (indirect) effects of recreation; they fail to analyze and properly mitigate for the continual operational effects of recreation on the wildlife and habitat.
- (g) S4. The IS/MND and the supporting documents are seriously deficient in their treatment of the project's operational (indirect) effects of recreation; they fail to analyze and properly mitigate for the continual operational effects of recreation on the wildlife and habitat.
- (h) S5. Formalizing the unauthorized trails requires mitigation.
- (i) S6. The closure and revegetation of unauthorized trails is a preserve management requirement and should not be used as mitigation for the habitat loss from building the proposed trails.
- (j) S7. Phase 1 of the project should be the restoration of the unauthorized trails. This should occur before the rest of the project moves forward.
- (k) S8. Tripling the miles of trails (excluding roads) in the Preserve is not necessary and many of the recommended trails are not justified. Proposed mitigation measures do not reduce the unavoidable long-term disruption to wildlife and habitat to less than significant, particularly in the northern portion of the Preserve, which has high biodiversity and many sensitive species locations, and within the Study Area for Trail 22.
- (l) S9. Several aspects of the updated RMP are of concern. We provide comments on those.
- (m) S10. We request several actions to address our concerns, including closing and revegetating proposed trails proposed in the northern parcels and Trail 22. As an alternative to the request about the trails in the northern parcels, we suggest a single trail aligned within the eastern half of the area.

Project Description

The proposed project is the update of the Sycamore Canyon/Goodan Ranch County Preserve 2013 RMP, which also involves an update of the PAP for the Preserve.

The approximately 2,994-acre Preserve currently contains 24 miles (19.5 acres) of authorized (~5.56 miles), unauthorized trails (~12 miles), and access and maintenance roads (6.61 miles) throughout the Preserve. Implementation of the proposed project's PAP would increase the approximately 5.56 miles of authorized trails to a maximum of 15.09 miles of authorized trails dedicated to multi-use routes for hikers, mountain bikers, e-bikers, and horseback riders. As detailed in Table 1 below (from page 4 of the IS), the 15.09 miles of authorized (multi-use) trails plus the 6.61 miles of existing access and maintenance roads available for trail use and to be retained would total 21.7 miles.

Table 1 Public Access Plan Trail Network	
Trail Types	Trail Length
Existing Formal Trails to Remain	5.56 miles
Existing Informal Trails to be Formalized	4.76 miles
New Proposed Trails	3.78 miles
Future Trail Connections	0.99 miles
Total Multi-Use Trails	15.09 miles
Access Roads to Remain	6.61 miles
Total Multi-Use Trails and Access Roads	21.7 miles

Response to Comment 5-e

The commenter expresses concern regarding the proposed trail network. This concern is acknowledged. This is a general statement; specific concerns are addressed in subsequent comments.

Response to Comment 5-f

The commenter expresses concern regarding analysis of the operational (indirect) effects of recreation. This concern is acknowledged. These are general statements; specific concerns are addressed in subsequent comments.

Response to Comment 5-g

The commenter expresses concern regarding formalization of unauthorized trails. This concern is acknowledged. These are general statements; specific concerns are addressed in subsequent comments.

Response to Comment 5-h

The commenter expresses concern regarding timing of restoration of unauthorized trails. This concern is acknowledged and it is the intent of DPR to ensure Phase 1 is the restoration of several unauthorized trails. Ultimately, phasing and implementation of the project is largely dependent on availability of funding. This is a general statement; specific concerns are addressed in subsequent comments.

Response to Comment 5-i

The commenter expresses concern regarding the extent of proposed trails. This concern is acknowledged. This is a general statement; specific concerns are addressed in subsequent comments.



- (l) The project would also include the closure and revegetation of a maximum of 7.24 miles (5.6 acres) of unauthorized trails not to be part of the formalized trail system. The 5.6 acres would include approximately:
- 0.9 acre of Diegan coastal sage scrub
 - 0.6 acre of coastal sage-chaparral transition
 - 0.8 acre of chamise chaparral
 - 1.9 acres of southern mixed chaparral
 - 0.3 acre of non-native grassland
 - 1.1 acres of disturbed habitat
- The project would result in a maximum of 6.8 acres of direct impacts:
- 2.9 acres from establishing new proposed trails
 - 0.6 acre of impact from potential future trail connections
 - 3.3 acres (approximately) of impact from improvements to existing trails in previously disturbed areas.
- The maximum acreages of direct impact by habitat would be:
- 3.0 acres of Diegan coastal sage scrub / coastal sage scrub chaparral transition
 - 1.5 acres of southern mixed chaparral / chamise chaparral
 - 0.7 acre of non-native grassland
 - 1.5 of disturbed habitat
 - 0.1 acre of coast love oak woodland (no individual oak trees)
- All direct impacts to habitat would be linear, along trail segments in previously undisturbed or disturbed areas.
- Detailed Comments on the IS/MND**
- (m) If the County provides responses to comments received, please consider our full comments - those in the main body of the letter plus the supporting information in the attachments.
- By convention, page #s in parentheses are the pdf page #s of the documents, whereas the #s outside of parentheses are the #s printed on the pages.
1. **The proposed formalization of the unauthorized trails would not meet MSCP standards.**
- Pursuant to the San Diego Subregional MSCP Plan, the IS states, "A key objective of the MSCP is to provide public recreation and educational opportunities within the MSCP Preserve System, while providing adequate protection for biological resources" [page 4, (21)]. It then makes the statement that "Trails, view overlooks, and staging areas are located or proposed within the least sensitive areas of the Preserve. Trails would be clearly demarcated and monitored for degradation as well as off-trail use" (emphasis added).
- (n) The proposed project would formalize 4.76 miles of unauthorized trails within the Preserve and add 3.78 miles of new trails. Some of the unauthorized trails were created subsequent to the establishment of the Preserve (see comment #2). Illegal access/use of these trails has continued

WHCC's Comments on the Sycamore Canyon/Goodan Ranch Preserve Draft IS/MND - RMP Update 3 of 12

Response to Comment 5-j

The commenter expresses concern regarding the aspects of the RMP. This concern is acknowledged. This is a general statement; specific concerns are addressed in subsequent comments.

Response to Comment 5-k

This comment requests that proposed trails in the northern parcels and Trail 22 be closed and revegetated and suggests an alternate of a single trail. Please refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels and Trail 22. No changes to the IS/MND are warranted.

Response to Comment 5-l

This comment contains a summary of the proposed project, including trail segment lengths and impact acreages, as presented in the IS/MND. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 5-m

The comment requests that DPR consider the comments provided on the IS/MND. DPR appreciates and has carefully considered all comments received. Responses are provided to the extent that comments address the adequacy of the IS/MND. The numbering conventions of the comment letter are noted. No changes to the IS/MND are warranted.

Response to Comment 5-n

This comment discusses concern for potential impacts to biological resources from trails and states that the IS/MND did not provide sufficient evidence for the conclusions that impacts would be less than significant.



Response to Comment 5-n (cont.)

DPR acknowledges the objectives of the Multiple Species Conservation Plan (MSCP) with regard to public recreation and the protection of biological resources. The proposed trail plan was developed through detailed analysis of opportunities and constraints, as well as extensive engagement with a wide variety of stakeholders. It seeks to locate trails, view overlooks, and staging areas in the least sensitive areas of the Preserve, in accordance with MSCP requirements.

Formalization of the existing trails on disturbed areas would be compatible with the findings of the Subarea Plan, including the findings in Section 1.9.1, which states: “A. Until all the areas of open space have been dedicated through the processing of maps, there may be a continuation of existing uses within areas shown as Preserve. B. Existing uses shall be allowed to continue, including annual clearing, maintenance and replacement of existing facilities, roads, and structures.

The land within the Preserve was privately held at the time of the creation of the Subarea Plan, and trails and ranch roads were present. Based on historical imagery analysis, disturbed habitat mapped within the footprint of the proposed trails on existing disturbed areas was impacted prior to when DPR acquired the property. Formalization of trails in these areas is consistent with the requirements of the MSCP and impacts to sensitive habitats from trail widening would be minimized or mitigated in accordance with the Biological Mitigation Ordinance (BMO) and Subarea Plan. Revegetation of the existing unauthorized trails, which additionally were impacted prior to when DPR acquired the property, would be an improvement relative to existing conditions and result in an overall ecological benefit to natural resources within the Preserve. Additionally, trails allow for passive recreational use that is considered a compatible use per the MSCP.



- (n) despite efforts by the DPR staff to stop that activity, and many of their alignments are not located in the least sensitive areas of the Preserve.
- As depicted in the RMP's trail maps (8A and 8B), vegetation/plant maps (10a; 12 a, b, c), and wildlife maps (13 a, b, c), the project proposes trails within or near to areas used by the MSCP covered species, coastal California gnatcatcher (CAGN) and mule deer use areas, and many other sensitive wildlife species. This is most evident in the 2015 Northern Addition and Sycamore North Addition where extensive looping trail segments crisscross habitat with dense sensitive species sightings. Proposed trail segments 3, 4, 6 will create significant direct and indirect impacts to wildlife that the proposed mitigation measures will not effectively reduce to less than significant. Proposed trail segments 22, 22a, and 22b (Rock and Roll) pose similar impacts.
- Furthermore, if built, proposed future trails (e.g., stub trails 3, 4, 15) will likely result in more unauthorized trail creation to connect their take-off points to illegal trails outside the Preserve that DPR has no control over.
- We address individual trails later in this letter. Generally, there is insufficient evidence in the project's documentation to adequately support its conclusions that adding and expanding trails within the Preserve as proposed can be effectively mitigated to a level less than significant for their potential impacts to biological resources.
2. **The proposed formalization of unauthorized trails requires mitigation.**
- The IS states *"Formalization of the existing trails on disturbed areas would be compatible with the findings of the Subarea Plan, including the findings in Section 1.9.1, which states: "A. Until all the areas of open space have been dedicated through the processing of maps, there may be a continuation of existing uses within areas shown as Preserve. B. Existing uses shall be allowed to continue, including annual clearing, maintenance and replacement of existing facilities, roads, and structures" [(5 (23))]. This statement also occurs in the IS/MND's Appendix I: MSCP Conformance Statement [(page I-4 (525))], which increases our concerns about it.*
- The IS/MND rely on this language to justify the lack of mitigation for the proposed formalization of the 4.76 miles of unauthorized trails. We disagree with the conclusion that no mitigation would be required. Using the closure and revegetating of unauthorized trails as mitigation is inappropriate because the original loss of the habitat (in addition to the ongoing disturbance to wildlife from the recreational use on such trails) has never been analyzed or mitigated for.
- Upon approval of the County's MSCP Subarea Plan for South County and by inclusion of the Preserve into the MSCP, the County "dedicated" the Preserve as part of the habitat to support conservation of the MSCP covered species. Unauthorized trails are not "existing uses" and formalizing them is not comparable to allowing continuance of the existing uses listed in Section 1.9.1.
- It is unclear how many of the unauthorized trails were created after the MSCP approval, how many were present at the time this Preserve was added to the MSCP, or how much they have expanded since then. However, a comparison of Figure 5 (pdf p. 25) in the [2008 survey report](#) with Figures 11 (pdf p. 40) and 21 (pdf p. 84) in the [Sycamore-Goodan PAP](#) reveals that the great majority of the
- (o)

WHCC's Comments on the Sycamore Canyon/Goodan Ranch Preserve Draft IS/MND - RMP Update 4 of 12

Response to Comment 5-n (cont.)

Please also refer to MR-1 with regard to the process undertaken to identify proposed trail alignments, and response to comment 5(y) with regard to potential impacts to biological resources. No changes to the IS/MND are warranted.

Response to Comment 5-o

This comment states that formalization of unauthorized trails requires mitigation. DPR will mitigate for impacts related to expanding existing trails, as appropriate and consistent with the BMO and Subarea Plan. Based on historical analysis, disturbed habitat mapped within the footprint of the proposed trails on existing disturbed areas was impacted prior to the adoption of the Subarea Plan in 1998 or prior to when DPR acquired the property. Based on historic aerial imagery, portions of Trail 22 do not occur on an existing disturbed area but occur as a proposed trail and the mitigation for trail widening/establishment will apply to this trail. The portions of Trails 1, 2, 3, 6, 12, 14, 15, 16, 17, 18, 19, 20, 22, 23, and 26 that are proposed for revegetation and the portions of Trails 3, 5, 6, 10, 11, 15, 26, and 29 that occur as disturbed habitat mapped within the footprint of the proposed trails on existing disturbed areas are visible in historic aeriels prior to the acquisition of the parcels. Because these impacts occurred prior to the acquisition of the parcels by DPR, which were added to the Preserve starting in 2010, these unauthorized trails are "existing uses" as stated in Section 1.9.1 of the MSCP Subarea Plan. Therefore, formalizing these unauthorized trails does not require mitigation, and closing and restoring unauthorized trails may be used as mitigation for project-related impacts to habitats. Future management of the Preserve in accordance with the RMP with Management Directives B.1 and C.5 will restore or revegetate degraded habitat. Management Directive C – Public Access Element requires signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access



- (o) trails Figures 11 and 21 depict respectively as “unauthorized trail” and “closed to be revegetated” did not exist in 2008 when the County took ownership of the land delineated in Figure 5.
- One of the management objectives for the MSCP Subarea Plan is “To enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat” [RMP (138)]. The RMP’s Management Directives B.1 and C.5, both Priority 1, and their associated implementation measures call for DPR to restore or revegetate degraded habitat on the Preserve, including from “unauthorized trail formation” as a matter of course in the management of the Preserve (2009, 2013, and 2023 RMPs).
- The California Department of Fish and Wildlife’s (CDFW) 2019 letter to DPR about the then draft PAP states the following about unauthorized trails, “Since these trails were unauthorized, user-created trails and the associated direct and indirect impacts to sensitive natural resources were never formally evaluated and/or mitigated by County DPR, their closure and restoration should not be used to mitigate impacts associated with any new trails being formalized in other portions of the Preserve. Instead, these and any other unauthorized, user-created trails should either be closed and restored as part of general natural resource management/Preserve stewardship; or if the trails will be formalized as part of the Access Plan, then their direct and indirect impacts should be evaluated through a formal CEQA process.”
- Based on the above information, the IS/MND fail to adequately account for the past impacts from the unauthorized/expanded trails since the County took ownership of the Preserves parcels over time. Therefore, unless the County is able to definitively demonstrate that the existing conditions on the unauthorized trails to be formalized or closed and revegetated predated taking ownership of the Preserve parcels, we request that the IS/MND be modified to reflect that the footprint of the proposed formalization of the 4.76 miles of unauthorized trails is considered an impact to be mitigated per the Biological Mitigation Ordinance (BMO) as loss of the adjacent habitat.
3. Closing and revegetating unauthorized trails should not earn mitigation credit.
- For reasons similar to those provided in comment #2, we disagree with the statement in the PAP that, “There is an opportunity to ... close ... unauthorized trails in order to mitigate for the impacts of opening new trails” (page 44). Closing and revegetating unauthorized trails should not count as mitigation for the project-related habitat loss as proposed in MM-BIO-5 for mitigation for the loss of 3 acres of Tier II habitat.
- Therefore, unless the County is able to definitively demonstrate that the existing conditions on the unauthorized trails to be formalized or closed and revegetated predated taking ownership of the Preserve parcels, we request that the IS/MND be modified to (a) reflect that the closure and revegetating of unauthorized trails will not be considered mitigation for the project-related habitat impacts, and (b) describe the proposed alternate mitigation.
- In addition, given the diminished ecological function of the unauthorized trails from the habitat loss and the ongoing effects on wildlife from recreation on them, DPR should commence construction for this project only after all trails in the southern areas slated for closure and revegetation are successfully closed and revegetated as demonstrated through management (enforcement if

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Response to Comment 5-o (cont.)

(Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary trail closures, and educational panels and displays providing information about the surrounding ecosystem. No changes to the IS/MND are warranted.

Response to Comment 5-p

This comment indicates that closing and revegetating unauthorized trails should not earn mitigation credit. The referenced statement in the PAP reflects a general summary of opportunities related to trails in the Preserve.

Please refer to response to comment 5(n) with regard to the appropriateness of restoration of unauthorized trails as mitigation. Figure 21 of the PAP shows the trails that would be closed as part of the proposed project and Figure 26 of the PAP shows the proposed project’s phasing. As described in Section 6.4.1 of the PAP, Phase 1 includes closing and restoring existing trails to be closed or temporarily remain closed (other than reroutes). Other activities that are included as part of Phase 1 are limited to continuing management of existing formal trails designated to remain open; opening existing informal trails recommended by the PAP to remain, including updating trail maps and public information, installing signage, maintenance, and related management activities; and installing signs and barriers to temporarily close trails that lead off of DPR property without authorized access on the other side. Thus, restoration of unauthorized trails would occur prior to any construction of new trails. Therefore, project mitigation is phased ahead of impacts to ensure adequate habitat mitigation. DPR will continue to implement Preserve management and monitoring as described in the RMP. No changes to the IS/MND are warranted.



(p) necessary) and monitoring. This alone should be Phase 1 if the project moves forward; and, it should occur as a matter of normal management if the project does not proceed (see comment #3). Here, we refer namely to the many trails leading into and out of the Clark Canyon area and those heading west into MCAS Miramar.

4. Some of the proposed trails are unacceptable.

(q) The proposed project would nearly triple the 5.56 miles of existing authorized trails to a maximum of 15.09 miles. For the reasons provided below and in other comments herein about the effects of recreation on wildlife, and further supported in Attachments 1 and 3, we oppose the trails listed below. While DPR knows about some of our trail-specific concerns from our 2018 and 2019 letters and our meetings, we provide more rationale for our position in this letter, and suggest an alternative / compromise to the trails on the northern parcels.

(r) For the reasons provided below and elsewhere in this letter, we believe that the project's mitigation would not reduce the potential biological impacts to less than significant, particularly for the MSCP covered and other sensitive species occurring in the northern parcels and the Study Area for Trail 22. The proposed trails in the northern parcels would cause unmitigable impacts to the part of the Preserve that is dominated by sensitive sage scrub communities and supports a highly biodiverse set of sensitive species. Therefore, the finding that any conflict with the provisions of the County's MSCP Subarea Plan would be less than significant is unwarranted [IS page 42 (60) "e"].

The removal of certain proposed trail segments from the PAP, notably the trails in the northern parcels area and Rock and Roll Trail (22, 22a, 22b and 25), would reduce the project's impacts significantly. The more of the proposed trails that are built, the more inadequate the IS/MND are.

A. The network of trails on the northern parcels (i.e., trails 3, 4, 5, 6, 7, 26, and 30).

(s) This proposed formalization of the network of unauthorized trails in the northern parcels should not occur because it would potentially cause significant impacts to core habitat, corridor/ linkages, sensitive species, and soils/substrate. This area and nearby parcels comprise a biological resource core area that supports numerous MSCP covered and other sensitive species. This trail network would impact the only portion of the Preserve where CAGN have been reported in recent surveys, which increases the sensitivity of those habitat areas and the significance of the impacts.

This area is also a critical portion of the wildlife corridor extending north and south of Scripps Poway Parkway (SPP) via flight for birds, bats, and insects and via the wildlife tunnel, allowing wildlife to move southward through the Preserve (Attachment 2). Formalizing the unauthorized trails in this area would increase the level of human use, and thereby potentially further constrain wildlife use of and movement through the area, and increase the potential for illegal use of neighboring Poway HCP conservation lands and the SPP wildlife tunnel. Furthermore, the close proximity of the loop trails to each other (trails 26, 3-5, and 6) creates effect zones that permeate the areas within the loop trails, rendering those areas less ecologically functional with exposure to continual operational effects (see comment #5 and page 6 in Attachment 3).

Please refer to Attachment 1 for a suggested alternative to the network of trails.

WHCC's Comments on the Sycamore Canyon/Goodan Ranch Preserve Draft IS/MND - RMP Update 6 of 12

Response to Comment 5-q

The commenter expresses concern regarding some of the proposed trails. While this concern is acknowledged, the proposed project would provide approximately 3.78 miles of new proposed trails, 0.99 mile of potential future trail connections, 4.76 miles of formalization of trails or trail segments on existing disturbed areas, and 5.56 miles of existing formal trails, while closing 7.24 miles of existing trails. Thus, the proposed project would increase the trail mileage by 4.77 miles, from 10.32 miles to 15.09 miles, while closing 7.24 miles of existing trails.

Please refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels and Trail 22, and to the response to comment 5(y) with regard to disruption to wildlife and habitat. No changes to the IS/MND are warranted.

Response to Comment 5-r

The commenter expresses concern regarding the adequacy of biological mitigation. This concern is acknowledged. The findings of the proposed project's BRTR state that impacts can be avoided or are mitigable to less than significant levels and would be mitigated in accordance with the County's biology guidelines and the MSCP Subarea Plan. Because the proposed project is designed to avoid, minimize, and mitigate impacts in conformance with the BMO and Subarea Plan, impacts are fully mitigated. Specific concerns are addressed in subsequent comments. Please also refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels and Trail 22. As described throughout these responses, the IS/MND adequately demonstrates that impacts to biological resources resulting from the proposed project would be reduced to below a level of significance through the identified mitigation measures. No changes to the IS/MND are warranted.



Response to Comment 5-s

This comment expresses concern regarding impacts related to core habitat, corridor/linkages, sensitive species, and soils/substrate associated with proposed trails in the northern parcels. Impacts to core habitat, corridor/linkages, sensitive species, and soils/substrate were determined to be less than significant with the incorporation of the proposed project's mitigation measures. Wildlife movement is not expected to be substantially constrained by the construction of new trails as (1) trail construction would not substantially change the topography; (2) the proposed project maintains connectivity to core wildlife habitat along the Sycamore Canyon Creek and Clark Canyon to the surrounding undeveloped areas; (3) the proposed project would not impact existing Waters of the U.S./State at trail crossings; (4) trails would not be so wide or heavily-trafficked as to prevent animals from moving across them; (5) existing lines-of-sight are maintained across trails. The Preserve and surrounding Pre-Approved Mitigation Area (PAMA) land provides adequate space and resources for wildlife known to use the site, maintains connectivity to off-site resources, and functions to facilitate bird and mammal movement through the area, including for species targeted for conservation in the region, such as the coastal California gnatcatcher (CAGN). The multi-use trails do not preclude the CAGN and southern mule deer from crossing them, and southern mule deer have been documented by wildlife cameras traversing existing trails within the Preserve. As previously noted, the proposed project would avoid the riparian vegetation associated with Sycamore Canyon Creek, thus maintaining nesting, foraging, and dispersal areas for many avian species. By avoiding impacts to Sycamore Canyon Creek and other drainages, the proposed development would also not result in a barrier to movement for amphibian species. No improvements are proposed for existing trails to be retained, thus, disruption to wildlife associated with trail construction would be minimal.



Response to Comment 5-s (cont.)

Wildlife movement functions would be improved by the closure and revegetation of other existing trails, including those leading to and within Clark Canyon. Because the Preserve is a BRCA, measure BIO-3 would mitigate for impacts to 3.0 acres of Diegan coastal sage scrub and coastal sage-chaparral transition would be mitigated at a 1.5:1 ratio through preservation/restoration, or purchase of Tier II mitigation credits. As described in Section IV.d of the IS/MND, the proposed trail segments would not substantially interfere with the ability of wildlife species to disperse to adjacent conserved land areas. Formalizing existing unauthorized trails is intended to provide for more controlled trail use and is not expected to increase the existing level of use of these trails. Furthermore, DPR does and will continue to monitor Preserve usage via trail counters. Additionally, Adaptive Management Measure C.5.5 was added to the RMP (RMP page 128) and will regularly evaluate this data to identify future changes in usage. Please refer to the response to comment 5(t) with regard to the wildlife corridor extending under Scripps Poway Parkway and to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels and Trail 22. No changes to the IS/MND are warranted.



(t)

B. Trail 4, South Raptor Loop Northwest – Potential Future Trail Connection.

Trail 4 is among the trail segments discussed in the previous comment. But, the potential biological problems it presents are of such concern as to warrant a separate comment. CDFW's 2019 letter cited above states, "... the fact that the Wildlife Tunnel was CEQA-required mitigation for wildlife movement within an MSCP Core Biological Resource Area further supports the Department's recommendation that County DPR remove any reference to a potential trail alignment off County owned lands through this sensitive resource area in an effort to avoid further degradation of this important wildlife movement corridor." The parcels between the Preserve boundary and the wildlife tunnel are part of the City of Poway's mitigation for the SPP extension project, which was the impetus for the City's HCP (see Attachment 2).

A June 28, 2022, letter from the CDFW to City of Poway Planner, David DeVries, states that the tunnel, "is critical in maintaining wildlife connectivity within a Core Biological Resource Area (CBRA), which is identified in the Multiple Species Conservation Program Subregional Plan." The San Diego Tracking Team, which has been studying wildlife use of the wildlife tunnel and its associated mitigation parcels for decades, has documented a reduction in the diversity of wildlife species and overall use by wildlife of this corridor as the illegal recreational uses there have increased. All that can be done should be to prevent and discourage additional illegal public use of this area.

Therefore, notwithstanding the note in Table 12 of the PAP that Trail 4 is "Appealing to mountain bikers due to terrain, single track condition, and eventual connection to the north of Preserve," we request that DPR remove Trail 4 from the PAP.

(u)

C. 15 – South of Ridge Trail – Proposed Trail, Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate

This proposed trail has no apparent legal destination or loop. It will likely result in more unauthorized trail creation to connect to illegal trails outside the Preserve that would be difficult to enforce. The illegal and enormously destructive "Sidewinder Trail" is a predictor of such an occurrence should Trail 15 be formalized. The future trail connection encourages use of private property and continued illegal access from Santee. The proximity of Trail 15 to sensitive Clark Canyon is also troubling with respect to additional illegal access. There are sensitive biological resources located along this trail including many species of special concern and MSCP covered species.

(v)

D. 22 – Rock and Roll Trail — Proposed Trail, Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate

Based on the following information, the proposed mitigation measures that address the biological resources along Trail 22 would not lessen the biological impacts from its formalization to below a level of significance.

Trail 22 is an unauthorized trail whose destination is otherwise available via the Sycamore Park Drive and the Slaughterhouse Canyon Trail. Other than desired recreation, DPR has not demonstrated a need for this trail. Trail 22 travels through habitat that is sensitive in many ways. It does not provide access to County-owned land. Its alignment abuts the eastern boundary of the Preserve, which is a known wildlife corridor already constrained by Hwy 67 to

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Response to Comment 5-t

This comment requests the removal of Trail 4 from the PAP. The proposed project was designed to avoid sensitive resources to the extent feasible while maintaining public access to the Preserve and conforms to all MSCP requirements. Please refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels. The proposed project's PAP identifies South Raptor Loop Northwest (Trail 4) as a potential future trail connection that leads to the Scripps Poway Parkway tunnel. As noted in the PAP, this trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Until legal access is available, DPR would use signage and potentially barriers, as appropriate, to prohibit access. No changes to the IS/MND are warranted.

Response to Comment 5-u

The commenter expresses concern regarding the adequacy of biological mitigation. This concern is acknowledged. The findings of the proposed project's BRTR state that impacts can be avoided or are mitigable to less than significant levels and would be mitigated in accordance with the County's biology guidelines and the MSCP Subarea Plan. Because the proposed project is designed to avoid, minimize, and mitigate impacts in conformance with the BMO and Subarea Plan, impacts are fully mitigated. Specific concerns are addressed in subsequent comments. Please also refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels and Trail 22. As described throughout these responses, the IS/MND adequately demonstrates that impacts to biological resources resulting from the proposed project would be reduced to below a level of significance through the identified mitigation measures. No changes to the IS/MND are warranted.



Response to Comment 5-v

The commenter expresses concerns regarding Trail 22. These concerns are acknowledged. Please refer to MR-1 with regard to the process undertaken to identify the proposed Trail 22. Management Directive C – Public Access Element requires signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access (Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary trail closures, and educational panels and displays providing information about the surrounding ecosystem. Trail 22 would not constitute an impediment to mule deer, Quino checkerspot butterfly (QCB), or Hermes copper butterfly (if they return as habitat recovers from wildfire) movement between Sycamore Park Drive and SR-67 because (1) trail construction would not substantially change the topography; (2) the proposed project maintains connectivity to core wildlife habitat along the Sycamore Canyon Creek and Clark Canyon to the surrounding undeveloped areas; (3) the proposed project would not impact existing Waters of the U.S./State at trail crossings; (4) trails would not be so wide or heavily-trafficked as to prevent animals from moving across them; (5) existing lines-of-sight are maintained across trails. Sensitive plants including Deane’s milkvetch, and host plants for QCB such as dot-seed plantain, woolly plantain, purple owl’s clover, and rigid bird’s beak would continue to be conserved and managed within the Preserve as over 1,000 acres of Diegan coastal sage scrub and coastal scrub will continue to be conserved and managed in perpetuity by DPR.

No cultural resources have been mapped adjacent to Trail 22a. The potential future trail connections would be the last phases of the project to be built and would only be built if additional permissions are obtained. No changes to the IS/MND are warranted.



- (v) the east and Sycamore Park Drive to the west. It would unnecessarily bisect this already narrow corridor that is used by many host, sensitive, and covered species, including but not limited to mule deer, Quino checkerspot butterfly (QCB), Hermes copper butterfly (if they return as the habitat recovers from fire), Deane's milkvetch, dot-seed plantain, woolly plantain, purple owl's clover, and rigid bird's beak. The southern end of this trail (22a) also would impact significant cultural sites, which is likely why the equally unacceptable alternate Trail 22b has been proposed in pristine habitat. The future connection of this trail connects to private property at the north. This would encourage unauthorized use of private property.
- (w) **E. 25 – Connection to Calle de Rob and Rock and Roll Trail – Potential Future Trail**
Trail 25 is another loop for Trail 22, and should also not be developed. Many of the comments for Trail 22 also apply to Trail 25. Trail 25 too connects to private property at the south, which would encourage unauthorized use of private property.
- (x) **F. 33 – Rock and Roll Trailhead Parking**
This new parking lot would be on Sycamore Park Dr. There is currently no parking enforcement on the entire length of this entrance road. The absence of parking on this road helps to decrease human intrusion on a long stretch of native habitat. A parking lot here would erode this habitat protection and visitors would likely park additional vehicle outside the five spaces. Enforcement would be challenging. The history of building trailhead parking in San Diego County has shown that the number of visitors wishing to park their vehicles increases rapidly to capacity and there continues to be parking on adjacent roadways. The Iron Mountain, Mount Woodson, and Three Sisters trailheads are examples.
- Please refer to Attachments 1 and 3 for further rationale for our opposition to these trails.
5. **The documents are deficient in the analysis of and mitigation for operational (indirect) recreational effects.**
- (y) The omission in the IS checklist of a question pertaining to the project's indirect effects on sensitive species is not only non-compliant with the instruction mentioned below, but it also resulted in deficiencies in the IS/MND's impact analysis of and mitigation for the project's operational (indirect) recreational effects. These deficiencies make it infeasible to make a determination (regarding operational effects) on the mandatory finding of significance for the project's potential to "reduce the number or restrict the range of a rare or endangered plant or animal" [108 of the IS/MD (90)].
- The project analysis seems not to have applied instruction #2 of the Instructions on Evaluation of Environmental Impacts, stating, "All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts" [IS page 14 (32), emphases added].
- (z) Over the nearly 25 years since the first MSCP preserves were approved, information about how to identify, monitor, and manage threats has grown significantly. In particular, the direct and indirect effects from recreation (both active and passive) are likely more impactful than what was assumed during the creation of the MSCP. Refer to the [CFW Journal Special Issue on Recreation 2020](#), which provides ample information about studies that document such effects, including information on studies done on NCCP/HCP preserve lands in Orange and San Diego counties. The San Diego

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Response to Comment 5-w

The commenter states similar concern regarding Trail 25 as noted for Trail 22 and that Trail 25 would encourage unauthorized use of private property. This concern is acknowledged. Please refer to MR-1 with regard to the process undertaken to identify proposed trail alignments. The potential future trail connections would be the last phases of the project to be built and would only be built if additional permissions are obtained for access across private lands. Trail 25 occurs outside the QCB avoidance area and outside populations of San Diego thornmint. Management Directive C – Public Access Element requires signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access (Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary trail closures, and educational panels and displays providing information about the surrounding ecosystem. Areas of potential future trail connections would have barriers installed along points of unauthorized access until permissions for access across private lands are obtained. No changes to the IS/MND are warranted.

Response to Comment 5-x

This comment states that new parking at the Rock and Roll trailhead would result in additional visitors whose parking would be difficult to enforce and would result in impacts to native habitat. There is currently an informal parking area located at the proposed parking location. The formalization of this parking area within existing disturbed habitat is proposed to facilitate access to the Rock and Roll Trail and allow for necessary parking within the Preserve without obstructing road access on Sycamore Park Drive. Enforcement would continue throughout the Preserve, including enforcement of no parking along the length of the entrance road. Habitat protection due to the use of the Preserve's trails would be enforced through implementation of the proposed project's RMP Management Directives. No changes to the IS/MND are warranted.



Response to Comment 5-y

This comment states that the IS/MND is deficient in the analysis of indirect impacts on sensitive species. The IS checklist used is consistent with the checklist provided in Appendix G of the State CEQA Guidelines; the addition of a separate question addressing indirect effects is not necessary for CEQA compliance. The IS/MND (page 41) concludes that potential indirect impacts to sensitive habitat resulting from human access, domestic animals, and exotic plant species would be avoided through the implementation of project design features based on the measures contained in the RMP and PAP. Operational effects of the Preserve's recreational use are addressed through the proposed project's RMP, which identifies Management Directives that relate to the management of the Preserve's operations. Chapter 5 of the RMP identifies Management Directives which would be implemented to counter the effects of trail use throughout the Preserve. Potential indirect impacts to sensitive habitat resulting from human access, domestic animals, and exotic plant species would be avoided through the implementation of Management Directives in the RMP. These include operational BMPs, the posting of signs precluding access to areas outside of established trails, and the posting of signs prohibiting off-leash pets. The Preserve entrances at Sycamore Canyon Road and off of SR-67 are locked after business hours and there are several interior gates that have County padlocks and are kept open only during business hours.

Indirect operational effects would be covered through the implementation of Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element.



Response to Comment 5-y (cont.)

Management Directive C – Public Access Element requires signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access (Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary trail closures, and educational panels and displays providing information about the surrounding ecosystem. Management Directive C additionally requires that points of unauthorized access and sensitive species impacts will continue to be identified in conjunction with habitat, plant and wildlife, and access road monitoring activities; any installation of fences or gates will be designed and located so they do not impede wildlife movement or impact cultural resources; and DPR will track and limit the number and timing of organized events occurring within the Preserve, including but not limited to trail races (foot/bicycle races), to help ensure that such events do not substantially alter trail conditions, cause damage to native habitats, or result in adverse conditions for native species. The number and type of allowable events may vary from year to year based on Preserve conditions as well as effects on Preserve management resulting from previous years' events.

Management Directive D – Operations and Facility Maintenance Element requires maintenance of restrooms and trash receptacles, enforcement of regulations regarding littering/dumping (County Code of Regulatory Ordinance Section 41.116), monitoring of trail use to ensure the integrity of Sycamore Creek is not being affected, and monitoring of potential sites that may erode and installing best management practices (BMPs) to stabilize slopes.

Furthermore, the proposed project would include implementation of a PAP, which would formalize existing unauthorized trails and close existing trails throughout the Preserve.



Response to Comment 5-y (cont.)

The operational indirect effects of the Preserve's use would be reduced as compared to existing conditions. Section 2.5 of the BRTR discusses indirect impacts that may occur from project implementation. As the site is already subjected to human uses, with most proposed trails following existing informal trails, the proposed project would not represent a significant increase in human activity. Furthermore, formalizing the trail network through the Preserve with signage to direct visitors onto the correct trails and revegetation of closed, unauthorized trails would help dissuade trespassing into closed areas and provide further protections for sensitive habitat areas, therefore reducing the effects of recreation on wildlife and habitat throughout the Preserve.

In response to this comment, additional details regarding this topic have been added to page 33 of the IS/MND for ease of reference, consistent with the analysis presented in the BRTR (Appendix B). Additionally, it should be noted that the referenced mandatory finding of significance actually addresses the project's potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal species. The analysis provided substantiates that, with implementation of the required management measures, no significant indirect/operational impacts would occur and no mitigation is required. Therefore, the IS/MND adequately analyzed the operational indirect impacts of recreation.

Response to Comment 5-z

The comment provides a background on the MSCP and provides a study about the direct and indirect effects from recreation activities on preserved lands. Direct and indirect effects due to the use of the Preserve were addressed in the subject documents, as discussed in response to comment 5(y). Additionally, indirect effects would be managed through the proposed project's RMP, specifically the Management Directives provided in that document.



- (z) Management and Monitoring Program (SDMMP) considers human use a threat to conservation, as reflected in its work on preserve metrics.
- CDFW's 2019 letter states that, "both direct and indirect impacts must be mitigated under CEQA, and indirect impacts may be up to 300 feet or more on either side of a proposed trail, depending on trail type, anticipated usage level, and the types of wildlife/species present. We recommend that if significant direct or indirect impacts to sensitive species associated with the Access Plan cannot be avoided and/or minimized, then appropriate mitigation be proposed on adjacent suitable Preserve lands" (emphases added).
- (aa) Yet, throughout the documents, there is little acknowledgement of the project's biological operational effects, much less any analysis of or mitigation for them. The biological mitigation measures, particularly MM-BIO-1 through MM-BIO-10, address avoiding or minimizing only direct impacts (e.g., cleared, graded, thinned) to areas that are documented or known/presumed to support some of the sensitive species known to occur there. However, the indirect effects especially to wildlife (versus plants) from the ongoing (i.e., operational) authorized recreational access and activities on the existing and expanded trail system will extend beyond the directly impacted footprints or avoided species siting locations.
- Based on the information above and in Attachment 3, we request that DPR:
- now analyze the potential operational effects from recreation on the biological resources (primarily wildlife) the Preserve supports;
 - provide mitigation for those impacts; and
 - as a component of the mitigation, implement MM-BIO-new# as described in Attachment 3.
- Please refer to Attachment 3 for further information clarifying and supporting our comment.
- (bb) **6. There is insufficient evidence for determination of less than significant with regard to impacts on wildlife movement or use of nursery sites.**
- We disagree with the determination in the IS that the project would have a less than significant impact on 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 [page 41 (59)].
- There is insufficient evidence in the documents to (1) adequately support this determination or the assertion that "The proposed trail segments would not substantially interfere with the ability of wildlife species to disperse to adjacent conserved land areas, as adequate connectivity is maintained" [page 41 (59)], (2) indicate that there was any related analysis of operational (indirect) effects, or (3) demonstrate that the analysis adequately considered the County's two following guidelines for determining significance for this determination:
- impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction, and
 - increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.

Response to Comment 5-z (cont.)

A Connectivity Monitoring Strategic Plan (MSP) has been developed by San Diego Management and Monitoring Program (SDMMP) for the San Diego Preserve System. The Plan was reviewed with relevance to the Preserve. The County is an active participant with SDMMP in the development of revised monitoring methods for the Subarea Plan.

The CFW Journal Special Issue on Recreation 2020 study cited in this comment states, "to meet conservation objectives, additional research is still needed to best inform recreation management in Park and Preserve Areas." The RMP emphasizes an adaptive management approach, which calls for research prior to establishing new trails. The study affirms DPR's approach to both direct and indirect impacts associated with public access: "it is critical RMP's are developed with a "clean slate" to identify critical sensitive species, regional context, and wildlife linkages up front. This, in turn, identifies potential areas appropriate for trails and other recreational uses, thus reducing debate and conflict later" and "we also recommend establishing appropriate monitoring programs that are used to evaluate conservation and recreation outcomes and modify management plans to better achieve the original goals and adjust to changing conditions." Mitigation measures for project implementation and Management Directives in the RMP for project operation support the suggested impact avoidance/minimization measures. Based on the foregoing and information included within the IS/MND, indirect impacts are appropriately addressed by the proposed project and no revisions to the IS/MND are necessary.

Response to Comment 5-aa

This comment expresses concern regarding analysis and mitigation of the project's biological operational effects. As described in responses to comments 5(y) and 5(z), indirect/operational impacts to biological resources would be less than significant due to implementation of appropriate management measures in accordance with the RMP. Because no significant impacts are anticipated, no mitigation is required. No changes to the IS/MND are warranted.



(bb) Recreational trails themselves can cause considerable problems for wildlife. Even where trails occupy a relatively small proportion of a landscape, they can be quite detrimental if in vital habitat; sensitive species whose territories or home ranges include the affected area(s) may be prevented via displacement or loss of habitat connectivity from accessing limited and essential resources (Gutzwiller et al. 2017).¹ It is unknown whether the project's trails' locations and total footprint (small relative the size of the Preserve) would act as barriers to wildlife movement or conduits to movement in such a manner that upsets the predator / prey relationships and other wildlife community dynamics in the Preserve. There is a high potential that the network of unauthorized trails proposed to be formalized in the northern parcels (and the use of the trails) would negatively affect wildlife movement in their vicinity and (indirectly) offsite to the west; and, they may impede the use of native wildlife nursery sites (see comments #4A and #4B).

In addition, the analysis for this significance criterion did not account for, but should have, the project-related operational level of recreation, type, timing (diel, seasonal), and human behavior. One example is the effect of the human voice - Suraci et al. found that the human voice alone can have far-reaching ecological effects.

We request that DPR conduct the analyses necessary to assess the project's potential operational effects relative to this significance determination guideline.

Please refer to Attachment 3 for further information supporting our comment.

7. Clarification is needed on the classification of disturbed habitat.

(cc) We are unclear about how the quantification of the impacts from the proposed formalization of existing unauthorized trails, and the classification of disturbed habitat (DH). The IS states, "[t]he PAP would provide approximately ... 4.76 miles of formalization of trails on existing disturbed areas" [page 3 (20)]. Per Table 6 in the BRTR, of the 6.8 acres of the project's proposed direct impact area, approximately 3 acres are classified "disturbed" (1.5 acres) or "developed" (1.5 acres).

An example that illustrates our confusion is Trail 22 (Rock and Roll), which the IS describes as composed primarily of DH and CSS [page 10 (28)]. Though the text does not so specify, we assume that the classification of DH applies only to the footprint of Trail 22 itself, given that it has been used long enough for it to be bare of vegetation and to meet the conditions of Holland/Oberbauer's description of DH, with the exceptions that the trail is not legal and may not been there for "decades," as is the case for the other unauthorized trails (see comment #2).²

¹ Gutzwiller, K. J., A. L. D'Antonio, and C. A. Monz. 2017. Wildland recreation disturbance: broad-scale spatial analysis and management. *Frontiers in Ecology and the Environment* 15(9):517–524.

² According to Holland/Oberbauer "Disturbed Habitat" is defined as "Areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association, but continues to retain a soil substrate.... Examples of disturbed land include areas that have been graded, repeatedly cleared for fuel management purposes and/or experienced repeated use that prevents natural revegetation (i.e., dirt parking lots, trails that have been present for several decades), recently graded firebreaks, graded construction pads, construction staging areas, off-road vehicle trails, and old homesites" (*Vegetation Communities of San Diego County-2008*, emphases added).

Response to Comment 5-bb

This comment indicates that there is insufficient evidence for conclusions regarding the significance of project impacts on the movement of fish and wildlife species. The analysis presented in the IS/MND is a summary of more detailed analysis contained in the BRTR. The two criteria mentioned and specific analysis related to them are presented in BRTR Sections 6.2.2(A) and 6.2.2(D). Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction are not expected to be substantially constrained by the construction of new trails as (1) trail construction would not substantially change the topography; (2) the proposed project maintains connectivity to core wildlife habitat along the Sycamore Canyon Creek and Clark Canyon to the surrounding undeveloped areas; (3) the proposed project would not impact existing Waters of the U.S./ State at trail crossings; (4) trails would not be so wide; or heavily-trafficked as to prevent animals from moving across them, (5) existing lines-of-sight are maintained across trails. An increase in noise and/or nighttime lighting in a wildlife corridor or linkage is not expected along trails during the proposed project operation because all trails will be restricted to non-motorized or e-bike use, and noise levels will be similar to the current use of existing access roads/maintenance roads and staging areas. Noise impacts are not expected along access roads/maintenance roads or staging areas, as noise anticipated to occur for future operations would not involve high-intensity noise sources or increase noise levels during operations. Night lighting would not result from the proposed project operation, because the Preserve closes at sunset and is not lit at night. Please also refer to the response to comments 5(f) and 5(z) with regard to operational effects. The Preserve is already subject to moderate human activity and implementing the proposed project is not anticipated to result in a substantial increase in human activity.



- (cc) But, Figure 8b in the BRTR seems to map Trail 22 entirely as native vegetation [20 (201) in the IS/MND document]; we cannot detect any DH within the Study Area encompassing Trail 22 on Figure 8b.³ And, the BRTR indicates that the proposed impacts along Trail 22 would be 0.3 acre of vegetation (0.2 acre of Diegan CSS, 0.1 acre of Southern mixed chaparral, 0.044 acre of non-native grassland) [Table H-2 in the BRTR (516 in the IS/MND document)]. No impact acreage is assigned to DH.
- Our questions regarding Trail 22 follow. We request the IS be modified to clarify the issues raised in these questions.
- Please clarify if the 6.8 acres of impact includes widening Trail 22 to meet DPR's trail design standards. If so, by how much?
 - If widening is proposed, would not the formalization of the trail involve impacts to the DH, such as grading? We ask because it seems odd that there would be impacts to 0.3 acre of the adjacent vegetation, but no impacts to the trail itself.
 - Would similar responses apply to all the unauthorized trails proposed to be formalized?
8. Additional comments are provided on the RMP, proposed mitigation measures, and the PAP.
- (dd) a. In addition to comments on the RMP elsewhere in this letter and the attachments, please refer to Attachment 4 for further detailed comments on it.
- (ee) b. For all the MMs pertaining to actions to take prior to and during grading, clearing, and construction, please modify them to require the same actions for the work on the trails to be closed. For example, please add trail revegetation etc. to MM-BIO-3, MM-BIO-8, and MM-BIO-9 regarding avoiding impacts to the CAGN, Hermes copper, and QCB, respectively.
- (ff) c. MM-BIO 4 addresses clearing or grubbing of vegetation during the general avian breeding season. It allows for the qualified biologist to reduce the width of the buffer between the location of the clearing and/or grubbing and the observed nests, but it does not specify an initial buffer width. Please modify MM-BIO-4 to specify a width, as does MM-BIO-3.
- (gg) d. The PAP states, "Several of the informal trails traverse through private property and may require public access/trail easements prior to formalization. To formalize some of these trail connections, reroutes through previously undisturbed habitat may be required, if easements cannot be obtained" (page 45). Please add a mitigation measure to the IS/MND to account for any habitat loss that will arise from reroutes through previously undisturbed habitat.
- (hh) e. Please add a legend to Figure 13 of the PAP to reflect the explanatory text and Table 12 elsewhere in the PAP.

³ This may be because Trail 22 is 4 feet wide compared to the width of the trails where the grey color representing DH is visible, as for Trail 8 whose width is 12 - 20 feet and Trail 9 whose width is 20 feet wide [Table 12 in the PAP, page 72 (80), Constraints, Opportunities, and Conclusions for Preserve Trails].

Response to Comment 5-bb (cont.)

Furthermore, DPR does and will continue to monitor Preserve usage via trail counters and per Adaptive Management Measure C.5.5, will regularly evaluate this data to identify future changes in usage. The project would close existing unauthorized trails and implement RMP measures to appropriately manage human activity. Therefore, impacts from the proposed project related to this topic would be less than significant. No changes to the IS/MND are warranted.

Response to Comment 5-cc

This comment asks for clarification on the impact analysis related to Trail 22. Trail 22 was identified as partially existing on disturbed habitat because portions of informal trail were documented in the area, although these areas were not mapped as disturbed habitat during vegetation mapping. The exact amount of widening to achieve DPR's trail design standards would vary along the trail. The 6.8 acres of combined proposed trails, proposed trails on existing disturbed areas, and potential future trail connections includes the widening of Trail 22. Thus, vegetation impacts associated with widening of this trail are appropriately accounted for and addressed by the mitigation requirements. Impacts to mapped disturbed habitat are not anticipated from the establishment of Trail 22. To the extent that disturbed habitat currently exists in this trail alignment, the reported vegetation impacts and associated mitigation requirements are conservative. Widening of the proposed trails on existing disturbed areas is expected in some areas of the Preserve and are accounted for in the same manner. No changes to the IS/MND are warranted.

Response to Comment 5-dd

This comment refers to Attachment 4 of their comment letter for comments on the RMP. Please refer to the responses to comments 5(III) through 5(bbbb) regarding the comments provided in Attachment 4 of the commenter's letter.



Response to Comment 5-ee

This comment requests that pre-construction surveys for CAGN, Hermes copper, and QCB be conducted for trails to be closed. In response to this request, the nesting bird avoidance mitigation measures (MM-BIO-3 and MM-BIO-4) have been revised to include actions occurring within the revegetation areas (IS/MND pages 35 and 36). Additionally, the revegetation mitigation measure (MM-BIO-6) has been revised to include language requiring that a qualified biologist flag sensitive resources, including habitat suitable for Hermes copper butterfly and QCB, for avoidance prior to implementation/installation (IS/MND pages 36 and 37). The revisions to mitigation measures (MM-BIO-3, MM-BIO-4, and MM-BIO-6), combined with the protective measures contained in existing MM-BIO-8 and MM-BIO-9 adequately address the comment. Additionally, Hermes copper butterfly is presumed to have been extirpated from the Preserve. Therefore, the requested revisions to MM-BIO-8 and MM-BIO-9 are not necessary.

Response to Comment 5-ff

This comment requests that an initial buffer width is specified in MM-BIO-4. In response to this comment, MM-BIO-4 (IS/MND pages 35 and 36) has been revised to specify initial buffers of 500 feet for raptors and 300 feet for general avian species. These initial buffer distances are the generally accepted standards required by wildlife agencies (USFWS and CDFW) for compliance with the Migratory Bird Treaty Act and California Fish and Game Code. Expanded buffers will be implemented, as deemed appropriate and necessary, by the project biologist during construction.

Response to Comment 5-gg

This comment asks for mitigation to be provided to address reroutes through biological habitat identified in the PAP. The referenced text from the PAP regarding informal trails through private property was part of a constraints-level discussion.



(ii)

In closing, our comments provide ample information to demonstrate that the project's documentation is deficient in the analysis of the project's potential biological impacts and that the IS/MND provide insufficient mitigation to reduce several biological impacts to a level less than significant. We are hopeful that DPR will resolve these matters by addressing our concerns and incorporating our requests.

Thank you for the opportunity to comment on the draft IS/MND. Again, if the County provides responses to comments received, please consider our full comments - those in the main body of the letter plus the supporting information in the attachments.

If the County wishes to follow up on our comments, please contact Pam Heatherington at contactecsd@gmail.com.

Respectfully,

Lisa Ross, Chair
Sierra Club, San Diego Chapter

Jim Peugh, Conservation Chair
San Diego Audubon Society

Dan Silver, Executive Director
Endangered Habitats League

Diane Nygaard, President
Preserve Calavera

Sandra Farrell, President
Friends of Hedionda Creek

Laura Hunter, Board member
Escondido Neighbors United

Mike McCoy, DVM, President
Southwest Wetlands Interpretive Association

Karin Zirk, PhD, Executive Director
Friends of Rose Creek

Pamela Heatherington, Director
Environmental Center of San Diego

Deborah Knight, Executive Director
Friends of Rose Canyon

Robert Laudy, President
Friends of Goodan Ranch and
Sycamore Canyon Open Space

Justin Daniel, President
California Native Plant Society,
San Diego Chapter

Jeffrey W. Schmidt, CEO
Preserve Wild Poway

cc: Crystal Benham, Chief, Resource Management Division, SD County DPR
David Mayer, Environmental Program Manager, CDFW
Jonathan Snyder, Assistant Field Supervisor, USFWS
Susan Wynn, Supervisory Fish and Wildlife Biologist, USFWS

Response to Comment 5-gg (cont.)

The PAP identified the trail network that resulted from the initial constraints analysis, and no reroutes of informal trails on private property are planned as part of the proposed project. No additional mitigation measures are necessary as no additional reroutes or potential reroutes are anticipated. No changes to the IS/MND are warranted.

Response to Comment 5-hh

This comment requests that a legend be added to PAP Figure 13. The legend of PAP Figure 13 is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 5-ii

This comment is a concluding statement. DPR appreciates and has carefully considered all comments received. Responses are provided to the extent that comments address the adequacy of the IS/MND. As detailed throughout these responses, the IS/MND adequately demonstrates that biological resource impacts of the proposed project would be reduced to below a level of significance with implementation of the required mitigation.



Attachment 1

Additional Specific Comments on the Proposed Trails (continuation of comment #4 in the letter).

A. The network of trails on the northern parcels (i.e., trails 3, 4, 5, 6, 7, 26, and 30).

CDFW's April 30 2019 letter to DPR about the draft PAP states the following, in part.

- "Removing these proposed trail segments from consideration would allow some live-in and dispersal habitat in the northern portion of the Preserve not subjected to human encroachment and indirect effects associated with recreational uses."
- "In general, the Department recommends that County DPR remove all proposed trail alignments that end at the boundary of the Preserve if they do not connect to authorized trails on the adjacent publicly or privately owned property."

Suggested alternative to the proposed network of trails on the northern parcels.

We strongly suggest that, instead of building the proposed network of trails in the northern parcels, the County provide a single trail linkage that goes N-S along the eastern portions of the Wu and Hagey parcels to the existing access road (#9). The single trail linkage would be aligned specifically to avoid sensitive plant locations and the high-quality coastal sage scrub.

The linkage would be the eastern alignment for trail 26, to the eastern segment of trail 3, to the eastern segment trail segment 5 (i.e., east of trail 30), to trail segment 30, to trail segment 7, then to the junction with the access road (#9). None of the westerly segments of trails 26, 3, 5, or 6 would be formalized (nor trail 4 or the stub extensions of 3 and 7). This trail would also tie into a future Trans County Trail (TCT) from West Sycamore through Sycamore-Goodan (trails 10, 31 and 29 - which we have stated are not ideal but are not unacceptable) to the San Vicente area. Having a single N-S trail from SPP-SR67 to connect to a (future) TCT obviates the need for another N-S trail, which addresses CDFW's concerns identified above. If SPP-SR67 is a trailhead, then this alternative would conform with CDFW's comments above. And, this suggested alternative would also address our concerns about Trail #4 (see comment #4B).

The heavy presence of invasive species in the Wu and Hagey parcels appears to be a consequence of disturbance along unauthorized trails. If a single trail is authorized through Wu and Hagey per our suggested alternative, then invasive plant species removal and restoration of the unauthorized trails must begin along all of the other unauthorized trail segments within the northern parcels while the planning for the single trail alignment proceeds. Just as for the trails in Clark Canyon (comment #3), the success of the trail closures and restoration in the northern parcels must be demonstrated through management (enforcement if necessary) and monitoring. As with the trails in Clark Canyon, this too should be Phase 1 if the project moves forward with our suggested alternative.

B. Trail 4. South Raptor Loop Northwest – Potential Future Trail Connection.

Excepting limited equestrian use, the existing public uses of the tunnel are unauthorized; these include biking and hiking. Per the CEQA documentation for the SPP extension project, the City Council's Resolution No. 94-013¹ states, "Wildlife Corridors. Impacts to wildlife corridors in the area shall be partially mitigated by building an undercrossing(s) to facilitate wildlife movement as well as

¹ A Resolution Of The City Council Of The City Of Poway, California Certifying The Final Environmental Impact Report For The Proposed Scripps Poway Parkway Extension (County Of San Diego Sa-780) Project (State Clearinghouse No. 93091118) And Adopting Ceqa Findings And A Mitigation Monitoring Program For Project Implementation – dated February 8, 1994

Response to Comment 5-jj

This commenter suggests changes to the proposed network of trails on the northern parcels. Please refer to MR-1 with regard to the process undertaken to identify trail alignments in the northern parcels. The proposed PAP was developed through detailed analysis of opportunities and constraints, as well as extensive engagement with a wide variety of stakeholders, and DPR considered all public comments and recommendations during development of the conceptual trail alignments and trail map. DPR's goal was to utilize a fair planning approach that considers all user groups, including hikers, individuals with mobility limitations, mountain bikers, and equestrian groups, as well as provides for the protection of sensitive natural resources. Removal of the referenced trail segments in favor of provision of a single trail would not adequately provide for public recreation and the suggested revision is not necessary to provide adequate protection of biological resources. Potential future trail connections to off-site properties would only be authorized if legal access is provided to the off-site properties. If there is no legal access, these trails would not be authorized. Please also refer to response to comment 5(p) regarding project phasing. No changes to the IS/MND are warranted.

Response to Comment 5-kk

This comment is concerned with the Scripps Poway Parkway tunnel and preservation of its ecological function. The proposed project's PAP identifies South Raptor Loop Northwest (Trail 4) as a potential future trail connection that leads to the Scripps Poway Parkway tunnel. The County does not have land use authority over properties to the north of the Preserve. As noted in the PAP, this trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Until legal access is available, DPR would use signage and potentially barriers, as appropriate, to prohibit access. No changes to the IS/MND are warranted.



(kk)	<p>equestrian use in the area.” Logically, for reasons pertaining to ecology, management, enforcement, fiscal and staffing constraints, the same restrictions should to the mitigation parcels.</p> <p>Consider too that all jurisdictions in San Diego County with approved NCCP-HCP plans have an obligation to collaborate on regional conservation issues, such as wildlife linkages and corridors. Respecting DPR’s dual mission (i.e., We enhance the quality of life in San Diego County by providing exceptional parks and recreation experiences and preserving significant natural resources), it is still the case that primary purpose of the Preserve is the conservation of viable populations of the MSCP covered species in perpetuity, not the provision of recreational opportunities. In addition, the importance of the wildlife tunnel and its associated mitigation parcels in assuring a functional N-S wildlife movement in this area is critical to the Subregional MSCP. Therefore, any discussions the County has with the City of Poway and/or the Wildlife Agencies regarding the SPP wildlife tunnel and mitigation parcels should be about how to preserve its ecological function, not about how to accommodate public use that would be illegal.</p>
(ll)	<p>C. 22 – Rock and Roll Trail — Proposed Trail, Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate</p> <p>Trail 22 does not meet its own mandates for avoiding trail alignments in areas supporting sensitive resources; likewise it does not meet the intent of the following comment in CDFW 2019 letter, “...public access should avoid areas that support sensitive and covered species, rare plant communities, and areas that support or are adjacent to important and unique resources.” And, the trail conflicts with the following comment in CDFW’s 2019 letter, “In general, the Department recommends that County DPR remove all proposed trail alignments that end at the boundary of the Preserve if they do not connect to authorized trails on the adjacent publicly or privately-owned property.”</p>
(mm)	<p>Regarding the QCB, much of Trail 22 is within the QCB Avoidance Area where there is a high density of QCB host plants, which is why, despite the proposed mitigation, we believe the impacts to QCB would be significant (Fig. 12 on page 75 of the BTRT, pdf page 284 of the IS/MND document). Please provide information about where the methods in proposed mitigation measures BIO-6 and BIO-9 have proven to be successful.</p>
(nn)	<p>Trail 22 passes through an area where San Diego thorn-mint occurs. The proposed mitigation measures (BIO-1, BIO-2, and BIO-6) address the impacts only from the proposed construction and revegetation. There are no mitigation measures to adequately address the project’s potential operational impacts to this species and its habitat. Therefore, should the County retain Trail #22 in the PAP despite the concerns we have raised, we request the addition of an MM to the MND to address the potential operational loss of this species or its habitat (e.g., off-trail activity).</p>
(oo)	<p>Trail 22 is designated as a one-way trail, presumably because of its steepness (similar to the existing Martha’s Grove trail which is one-way), which suggests it is intended to be a fast descent trail. As such, it appears to be a dedicated mountain bike trail, which seriously limits its use by all other Preserve visitors (as with trail #12).</p>
(pp)	<p>See comment #6 about clarification needed about the classification of “primarily of disturbed habitat.”</p>
(qq)	<p>D. 25 – Connection to Calle de Rob and Rock and Roll Trail – Potential Future Trail</p> <p>Nothing further.</p>
	<p>E. 33 – Rock and Roll Trailhead Parking</p> <p>Nothing further.</p>

Attachment 1 to WHCC’s Comments on the Sycamore/Goodan Preserve Draft IS/MND & Final RMP 2 of 3

Response to Comment 5-II

This comment is concerned with Trail 22 and its alignment in areas supporting sensitive biological resources. Please refer to MR-1 with regard to the process undertaken to identify trail alignment for Trail 22. The proposed PAP was developed through detailed analysis of opportunities and constraints, as well as extensive engagement with a wide variety of stakeholders, and DPR considered all public comments and recommendations during development of the conceptual trail alignments and trail map. DPR’s goal was to utilize a fair planning approach that considers all user groups, including hikers, individuals with mobility limitations, mountain bikers, and equestrian groups, as well as provides for the protection of sensitive natural resources. Removal of Trail 22 would not adequately provide for public recreation and the suggested revision is not necessary to provide adequate protection of biological resources. Potential future trail connections to off-site properties would only be constructed if legal access is provided to the off-site properties. If there is no legal access, these trails would not be authorized. No changes to the IS/MND are warranted.

Response to Comment 5-mm

The commenter expresses concerns regarding potential impacts to QCB and adequacy of the associated mitigation. These concerns are acknowledged. MM-BIO-9 provides a number of conservation elements for the species. These measures include conducting QCB host plant mapping prior to construction when host plants are blooming, avoiding direct impacts to host plants as much as possible, prohibiting construction within mapped QCB host plant patches during the QCB flight season, and monitoring by a qualified biologist during construction. DPR will continue coordination with wildlife agencies throughout the proposed project process to ensure species conservation. Similar measures have been successfully implemented throughout other County preserves such as with the Tijuana River Valley Regional Park and Otay Valley Regional Park. No changes to the IS/MND are warranted.



Response to Comment 5-nn

This comment is concerned with operational impacts to San Diego thornmint. With regard to protection of thornmint populations adjacent to existing trails, the RMP includes Management Directive C.4.2, which requires that points of unauthorized access and sensitive species impacts continue to be identified through monitoring activities, and Management Directive C.4.1, which provides that fences, gates, and/or signage be installed as necessary in such areas. Additionally, MM-BIO-1 (IS/MND page 34) has been revised to provide a buffer of 25 feet where feasible and along with fencing and signage to protect populations of this species.

Response to Comment 5-oo

This comment states that use of Trail 22 by users other than mountain bike users would be limited. Please refer to MR-1 with regard to the process undertaken to identify proposed Trail 22. This comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 5-pp

This comment requests clarification of the term “primarily disturbed habitat” from a previous comment. Please refer to response to comment 5(cc) regarding the classification of disturbed habitat. No changes to the IS/MND are warranted.

Response to Comment 5-qq

This comment states there are no further comments about the Rock and Roll Trail or trailhead parking. As no further comments were provided regarding these trail segments, no response is necessary. No changes to the IS/MND are warranted.



- (rr)
- F. **Trail 11. Calle de Rob - Eastern Segment; County TCT - Proposed Trail on Existing Disturbed Area**
We understand the need to provide a route for the Trans County Trial (TCT) and therefore generally do not oppose Trail 11. But, Trail 11 is problematic due to its connection to Trail 29 which lacks access past Hwy 67 and San Vicente conserved lands to the east. The 2019 CDFW letter states, "However, the Department has concerns about any off-Preserve trail connections in this area that might lead users to the boundary of the Department owned— and managed—San Vicente Highlands open space, as this property is currently closed to public access."
- (ss)
- G. **26 – Northern Interior Loop – Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate**
Trail 26 is within the trail network in the northern parcels. This comment augments the comments in the letter about that trail network. The 2018 Baseline Biodiversity Survey Report for the Wu and Cielo Properties states, "The large coast live oak tree within the middle of the Wu parcels is currently occupied by a nesting great horned owl. While this species is not a special-status species, it is still protected by the federal Migratory Bird Treaty Act. Therefore, it should not be disturbed during the nesting season and park benches, tables, and trails should be placed at least 500 feet away to not disturb the great horned owls or cause them to abandon the nest. Temporary closures around the nest may be necessary to protect the owls during the nesting season" (page 80). If the County implements the PAP with Trail 26, please add a mitigation measure providing the protections described in this text.
- (tt)
- H. **29 – Connection to Calle de Rob Eastern; County TCT – Proposed Trail on Existing Disturbed Area**
We understand the need to provide a route for the TCT and therefore do not oppose Trail 29. However, Trail 29 is problematic because it lacks access past Hwy 67 and San Vicente conserved lands to the east. The 2019 CDFW letter states, "However, the Department has concerns about any off-Preserve trail connections in this area that might lead users to the boundary of the Department owned— end managed—San Vicente Highlands open space, as this property is currently closed to public access."

#####

Response to Comment 5-rr

This comment discusses concerns regarding the connection of Trail 11 to Trail 29 and lack of legal public access beyond it. Potential future trail connections are identified within the proposed project’s PAP, but would only be constructed if public access is available in neighboring parcels. Trail 29, therefore, would not be constructed unless the San Vicente Highlands open space is opened to public access and coordination between DPR, CDFW, and other relevant agencies would occur at that time. No changes to the IS/MND are warranted.

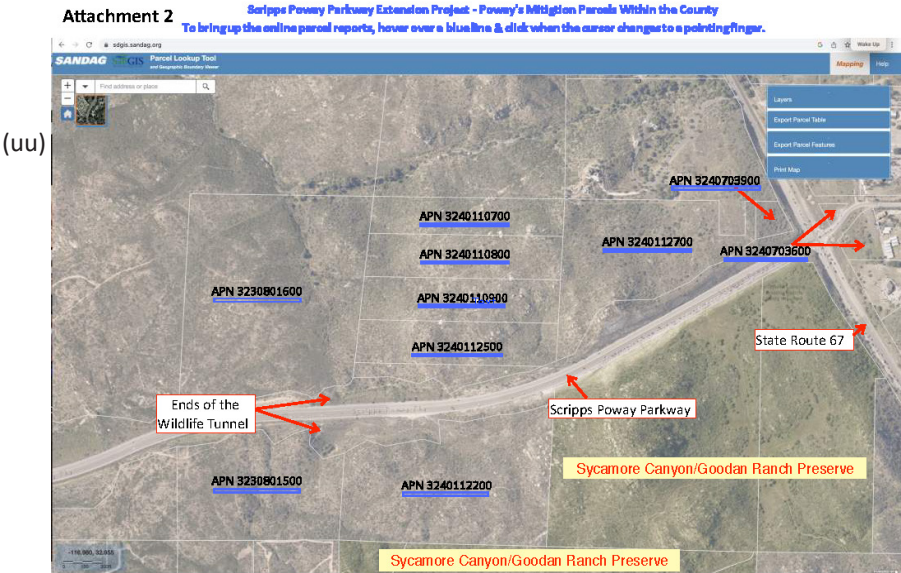
Response to Comment 5-ss

This comment discusses Trail 26 and protections for a nesting great horned owl that was previously observed in the vicinity. DPR will continue to provide for protection of sensitive biological resources in the Preserve through the implementation of adaptive management measures. Implementation Measure C.4.2 requires that points of unauthorized access and sensitive species impacts continue to be identified through monitoring activities, and Implementation Measure C.4.1, provides that fences, gates, and/or signage be installed as necessary in such areas. Implementation Measure C.5.2 provides for temporary trail closures (including to address sensitive biological resource impacts), accompanied by educational support and public notification through signs and public meeting announcements. Additionally, MM-BIO-4 requires a pre-construction survey if grubbing, clearing, or grading would occur during the general avian breeding season. No changes to the IS/MND are warranted.

Response to Comment 5-tt

This comment discusses Trail 29 and the lack of legal public access beyond it. Please refer to response to comment 5(rr) with regard to Trail 29. No changes to the IS/MND are warranted.





Attachment 2 to WHCC's Comments on the Sycamore/Goodan Preserve Draft IS/MND & Final RMP

Response to Comment 5-uu

This comment contains a map showing the location of the wildlife tunnel beneath Scripps Poway Parkway. Please refer to response to comment 5(t) with regard to Trail 4. No changes to the IS/MND are warranted.



Attachment 3

Deficient analysis of operational (indirect) recreational effects.
This attachment provides supporting information for comment #5 in the letter.

Preface

- (vv) The documents assert that the proposed project would not result in an increase in visitors to the Preserve, as exemplified by the statements in the footnote.¹ These statements seem speculative with regard to projected levels of visitation. For example, it is not clear what “significantly” or “substantially” mean; nor is it clear whether the analysis of project-related changes in visitor levels accounted for:
- the visitation along the proposed almost 4 miles of new trails;
 - the potential attraction of more visitors to the improved unauthorized trails to be formalized;
 - the potential increase in visitation along individual trails, particularly the trails traversing highly biodiverse areas of the Preserve, or areas with highly sensitive species;
 - the fact that the existing human use of the unauthorized trails should not be the baseline against which to compare the project-related changes in visitation.

Whereas, it is clear from the following statements that there is an expectation for an increase in use by mountain bikers: “[t]he Preserve is popular with San Diego’s mountain biking community. By incorporating various dedicated biking trails into the formal trail network, the Preserve can enhance its reputation as a mountain biking destination in San Diego County” (44 in the PAP).

Introduction

- (ww) We use the term “recreation-related effects” to encompass the direct and indirect effects on wildlife (and plants to a lesser extent) from trails themselves and the recreational activities on them.

The information here is about **authorized** trails and recreation on lands conserved primarily or solely (in some cases) to ensure the perpetuation of viable populations of sensitive species. In the case of the MSCP, reserves and their resident biota are *mitigation* for the impacts of development and infrastructure. Often, as in the case of the MSCP, a secondary purpose of these lands is to provide recreational opportunities to the public.

The MSCP assumption is that passive recreation is conditionally compatible with conservation. If this is to be true, the actual impacts of recreation must *first* be recognized, disclosed, avoided, minimized and mitigated like any other impact, and considered as to biological compatibility on the basis of objective

¹ Samples from the IS/MND and BRTR:

- (xx) a. “...implementation of the proposed project is not expected to **significantly** increase visitors to the site as compared to existing conditions” [75 (92) of the IS/MD document, emphasis added];
- b. “human access would not increase **substantially**, because the proposed project site currently operates as a Preserve with hiking trails and staging areas, which is subject to moderate human activity related to hiking and bicycle use. As the site is already subjected to human uses, with most proposed trails following existing informal trails, the proposed project would not represent a significant increase in human activity.” [70 of BRTR (259 of the IS/MD document), emphasis added]; and
- c. “As the parking capacity of the Preserve is not significantly increasing, it is not anticipated that the amount of visitors would **substantially** increase at the Preserve” [82 of the IS (100 of the IS/MD document), emphasis added].

Response to Comment 5-vv

This comment includes considerations for how to analyze impacts from increased visitors. The exact amount of visitors that would be attracted to the Preserve cannot be precisely quantified; therefore, the anticipated levels of use are described qualitatively. The Preserve is currently developed with a trail network and is subject to moderate human activity. The proposed project would provide approximately 3.78 miles of new proposed trails, 0.99 mile of potential future trail connections, 4.76 miles of formalization of trails or trail segments on existing disturbed areas, and 5.56 miles of existing formal trails, while closing 7.24 miles of existing trails. Thus, the proposed project would increase the trail mileage by 4.77 miles, from 10.32 miles to 15.09 miles, while closing 7.24 miles of existing trails. In summary, the 3.78 miles of new trails and 0.99 mile of potential future trail connections would be more than offset by the closure of 7.24 miles of existing trails, including informal trails. Use of the informal trails is the existing condition and therefore the appropriate baseline for comparison under CEQA. Formalizing existing unauthorized trails is intended to provide for more controlled trail use and is not expected to increase the existing level of use of these trails.

Trail users are able to park in existing formal lots at the Goodan Staging Area and Sycamore Staging Area. The PAP does not propose additional access roads within the Preserve, though it proposes the construction of the Rock and Roll Trailhead Parking area (#33), which would provide up to five additional parking spaces to the Preserve in an area that is currently being informally utilized for parking. As the parking capacity of the Preserve is not significantly increasing, it is not anticipated that the amount of visitors to the Preserve would substantially increase. The reputation of the Preserve as a mountain biking destination is intended to refer to the quality of users’ experience, rather than a planned increase in use by mountain bikers. DPR does and will continue to monitor Preserve usage via trail counters and per Adaptive Management Measure C.5.5, will regularly evaluate this data to identify future changes in usage. No changes to the IS/MND are warranted.



(ww)

analysis. Further, in the many years since MSCP adoption, the quantity and nature of recreational demand have increased and expanded beyond that anticipated, as with the invention of e-bikes. And, as indicated in comment #5, the SD MMP considers human use a threat.

(yy)

Beyond the direct recreation-related effects of habitat loss from trails and wildlife injury or death from trampling by or collisions with recreationists, indirect recreation-related effects include detrimental changes in behavior, reproduction, growth, immune system function, levels of stress hormones, and finally, to the survival of individual animals and persistence of wildlife populations and communities. The documented evidence of these disturbances to wildlife reveals the flaws in the prevalent assumption that recreation is generally compatible with biological conservation. This assumption usually rests on the expectations of (1) allowing only ecologically sound siting of recreational areas and ecologically acceptable types, levels, and timing of recreation, and (2) providing sufficient monitoring, management, and enforcement of recreation to ensure the perpetuation of viable populations of focal sensitive species. However, it is rare that these expectations are met.

Recreation ecology (i.e., study of environmental consequences of outdoor recreation activities and their effective management (Monz et al. 2009) has existed since the 1960s and has burgeoned in the last 20 years. Studies in recreation ecology have shown that the majority of documented responses of wildlife species to recreation are negative (Steven et al. 2011; Larson et al. 2016; Hennings 2017; Patten and Burger 2018).

(zz)

It's important to know that "authorized" is emphasized above because many people think that negative recreation-related effects result only from unauthorized trails and activities, when in fact the recreation ecology literature is generally about authorized activities. The point is that authorizing trails and recreation, even when done with sound planning in full consideration of the biological resources, does not preclude the potential for negative effects. Animals are blind to whether or not trails and recreation are authorized.²

If the RMP and the County's Targeted Monitoring Plan (ICF 2022; TMP) which the Sycamore/Goodan documents cite are indicative of what the County intends to do to assess the recreation-related operational effects on wildlife, we have concerns. The interplay between the TMP and DPR's RMPs is unclear.³ With respect to recreation-related effects on the species the TMP covers, any influence it has on the RMPs is concerning for several reasons, including the following.

(yy)

cont.)

² This is not to discount the recreation-related effects of unauthorized activities, but instead to emphasize that authorized activities can be just as or more impactful. The degree to which authorized or unauthorized trails and recreation cause negative indirect effects depends on many factors. The proliferation of unauthorized trails in San Diego County of course commands and warrants attention, but should not detract from properly planning, monitoring, and managing the authorized trails and recreational activities (see [A review of trail-related fragmentation etc in protected areas](#)).

(zz)

cont.)

³ The TMP applies to both the South and draft North County MSCP Plans. The TMP's purpose is "to provide detailed specifications for implementation of adaptive management and monitoring within County-owned and managed conserved lands (open space parks and preserves) overseen by [DPR]. The TMP is an adaptive implementation plan that incorporates the site-specific monitoring strategy included in the [RMPs], focused goals and objectives for target resources, and detailed monitoring protocols" (TMP page 1) The TMP further states, "An RMP focuses on an individual preserve, whereas the TMP takes a holistic view across the entire South County MSCP Subarea Plan and draft North County MSCP plan areas, focusing on the needs of species across County-managed preserves (as described above, 20 parks and preserves are now included in the plan, and others will be added in the future)" (TMP page 28).

Attachment 3 to WHCC's Comments on the Sycamore/Goodan Preserve Draft IS/MND & Final RMP 2 of 12

Response to Comment 5-ww

This comment provides a definition of the term "recreation-related effects" and notes the dual purposes of MSCP reserve lands. The BRTR and RMP identified the anticipated impacts associated with implementation and operation, and determined methods to avoid, minimize, and mitigate for potential impacts associated with project implementation and operation as applicable. No changes to the IS/MND are warranted.

Response to Comment 5-xx

The comment provides sample text from the IS/MND and BRTR. The comment does not address the adequacy of the IS/MND and no change to the document is warranted.

Response to Comment 5-yy

This comment provides background information on the indirect effects of recreation on wildlife, recreation ecology and the study of environmental effects from recreation. This comment does not address the adequacy of the IS/MND and no change to the document is warranted.

Response to Comment 5-zz

The commenter expresses concerns regarding the Targeted Monitoring Plan (TMP) and its relationship to RMPs. These concerns are acknowledged. The TMP is not an element of the proposed project or the subject of the current environmental review process. This comment does not address the adequacy of the IS/MND and no change to the document is warranted.



- (zz)
1. The TMP provides information about species-specific information, including threats to those species. It is inappropriate that the only recreation-related threats in TMP's species accounts are unauthorized activities.
 2. That the TMP does not identify recreation as a potential threat to all the species it covers is also inappropriate, given that, recreation potentially threatens all these species, except for plant species that never grow near trails whether authorized or unauthorized.
 3. Under "Manage public access within each preserve to ensure protection of biological and cultural resources," the TMP includes, "Incorporate information learned from a study conducted by the Colorado State University at Ft. Collins (Reed et al. 2019) that evaluates recreational impacts on MSCP-covered species," but the TMP does not elaborate on what information or where and when it would be incorporated [39 (45)].
 4. In recreation ecology, before-and-after-control-impact (BACI) methodology (typically using camera trap data) is often used to assess recreation-related effects.⁴ Managing recreation adaptively in response to the monitoring results is the cornerstone of large-scale multi-species conservation (CDFW 2014). Per the TMP, the only preserves to which seemingly similar methodology apply are the County's Boulder Oaks Oasis and the Ramona Grasslands Preserves [TMP p. 39 (45)]. Though there are some problems with the methodology as described in the TMP, and more information is needed to assess its adequacy, this is generally the direction that the County should take whenever (a) new trails are proposed on Preserves, and (b) existing trails are proposed for at least a 1-year temporary closure that is enforced. See MM-BIO-new# below.
 5. Area specific management directive (ASMD) C.4 in the TMP is, "Analyze any future proposed public access such that recreational use of the Preserve is consistent with the protection and enhancement of biological and cultural resources (Priority 2);" the RMP has the same ASMD, though it's C.3. Based on the description of Priority 2 in the RMP (pdf p. 138), this ASMD should not be Priority 2 for the following reason. The description in the RMP states, "Priority 2: Directives other than those required for sensitive species status and other long-term items that may be implemented during the life of the MSCP as funding becomes available." If the correct interpretation of this is that Priority 2 ASMDs are not required for sensitive species status, the implication is that the action in this ASMD is unnecessary for sensitive species. This is incorrect because public access can negatively affect common and sensitive species, as documented in several of the species profiles in the TMP.

Additional Specific Comments on the Mitigation Measures for the Proposed Project

- (aaa)
1. Because the project's documents don't acknowledge recreation-related operational effects, they also lack mitigation for them. The Sycamore/Goodan RMP states that one of its purposes is to "establish the baseline conditions from which adaptive management will be determined and success will be measured" [page 1 (9)]. In recreation ecology, monitoring for baseline conditions is best done prior to the onset of trail use. For the most part, this optimal approach is infeasible for the Sycamore/Goodan

(zz)
cont.

⁴ BACI studies provide information on wildlife habitat use and relative activity. Per Reed et al. (2019), "The relative [wildlife] activity results can be used to assess the level of recreation that is associated with unacceptable declines in mammal activity rates;" they therefore can be useful in (a) determining if thresholds based on relative activity (as an indicator of habitat suitability) are exceeded and, (b) assuming visitation rates are simultaneously monitored, if the thresholds have been exceeded. Other monitoring methodologies may warrant consideration, as long as they provide the data necessary for the needed purpose. Great care must be taken in assigning thresholds based on relative wildlife activity monitoring results.

Response to Comment 5-aaa

This comment expresses concern regarding recreation-related operational effects and lack of associated mitigation. The IS/MND and BRTR (and other associated documents) acknowledge and address recreation-related operational effects, as described in responses 5(y) and 5(z). The RMP refers to establishing baseline conditions, the surveys for which were completed prior to development of the 2023 RMP update. The 2023 RMP update considers the results of the baseline surveys completed to date and establishes management directives based on this data. Text in the RMP has been revised to "...compile the baseline conditions from which adaptive management will be determined and success will be measured." The baseline conditions were established at the time DPR acquired each property that assembles the Preserve; additional studies to establish thresholds for trail closure and action protocols are detailed in the RMP. The comment acknowledges the request for studies prior to the onset of trail use is infeasible for the Preserve. The RMP acknowledges operational effects and includes Management Directives that relate to those effects: Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element. These management directives would avoid significant environmental impacts; therefore, additional mitigation measures are not necessary. If new trails are proposed for the Preserve in the future, a subsequent environmental analysis would be completed to ensure impacts are avoided, minimized, or mitigated if needed. No changes to the IS/MND are warranted.



(aaa)

Preserve, but we request that DPR apply the approach to all proposed new trails on its MSCP Preserves. Following on #2 and #3 in the discussion above, please add the following mitigation measure, MM-BIO-new#, to the IS/MND. Just as for the project's proposed trail closures and revegetation (comment #3 in the letter, not above), the actions identified in MM-BIO-new# should be done in Phase 1 of the project before it moves forward; and, if the project does not proceed, the actions should occur as a matter of normal management.

MM-BIO-new# In order to adaptively manage the authorized operational trail use to ensure the Preserve's ability to support viable populations of the sensitive species occupying it, DPR shall collaborate with biologists (whether in an advisory capacity or otherwise) who have done work in recreation ecology to do the following.

1. Establish:
 - a. thresholds for the initiation of trail closures (see NOTE 1), and
 - b. protocols for action should the thresholds be exceeded.
2. Prepare:
 - a. a strategy to monitor the trail use to assess the effects of recreation on the wildlife (see NOTES 2 and 3);
 - b. methodology(ies) to analyze the data collected from the studies; and
 - c. a plan for the iterative adaptive management to be done in response to the data analyses, and consistent with the thresholds and protocols developed in #1 (see NOTE 4).
3. Conduct the monitoring, analyses, and iterative adaptive management as described in #2.
4. Formally integrate the above actions into the TMP, the Sycamore/Goodan RMP, all future RMPs, and at a lesser level of detail, into the FMP.

NOTE 1 For insights on thresholds, refer to the articles at the following hyperlinks.
[Recreation effects on wildlife: a review of potential quantitative thresholds 2021](#)
[Reserves as double-edged sword: Avoidance behavior in an urban-adjacent wildland 2018](#)
[Effects of Human Use of NCCP Reserves on Reptile and Mammal Species in San Diego 2019](#)

NOTE 2 The monitored trails should be:

- the proposed new trails - they should be monitored for at least a year prior to opening to the public and any illegal use should be quickly stopped;
- the unauthorized trails proposed to be formalized - their closure prior to onset of formalization must be enforced and last at least 1 year from the onset of monitoring; and
- any other trails deemed suitable for the monitoring strategy

NOTE 3 Consider BACI studies and other methodologies the collaborating biologists utilize.

NOTE 4 Effective iterative adaptive management requires timely responses to negative trends to prevent population-level effects that are unrecoverable. Wildlife activity patterns should be assessed annually for inferred population and activity trajectories, and trends should be reviewed more thoroughly on a 3-5 year basis, with consideration of larger regional patterns (Burger 2012). It would be a mistake to rely on the baseline survey data – the baselines surveys as described on page 12 of the RMP were not intended to assess the effects of recreation.



- (bbb) 2. MM-BIO-3 is to mitigate for potential impacts to the coastal California gnatcatcher, but it addresses only the grading and clearing of coastal sage scrub. This does not address the project-related operational effects. Therefore, please modify this MM to address the potential for gnatcatcher nesting in areas where the new trails will be built: if the species already occurs within what will be the recreational effect zone of the future trails, the mitigation should entail measures to avoid disruption of the breeding behaviors. Please apply the same approach for trails anticipated to experience project-related higher levels of recreation.
- (ccc) 3. MM-BIO-8 is for the Hermes copper butterfly. Though Hermes copper butterflies were not observed during biological surveys since prior to 2003 [IS/MND (48)], there is potential for them to occur in the preserve as it contains some suitable habitat for the species. Recreation can disturb butterfly behavior in ways that negatively affect their daily activities and reproduction (Bennett et al. 2013 – see information below). Therefore, please modify this MM to require the same kind of measures it describes for maintenance to also be implemented for recreation during the butterfly's egg-laying period, unless it is determined prior to each flight season that no Hermes are present.
- (ddd) 4. MM-BIO-9 is for QCB. Please apply the same as in the comment on MM-BIO 8.
- (eee) 5. MM-BIO-10 (MND, p. 37) is for the western spadefoot toad. We disagree that the proposed mitigation adequately addresses the project's potential recreation-related direct effects (e.g., injury or mortality from collisions with, trampling on) to the western spadefoot toad. Neither this MM nor any other addresses the potential project-related direct operational effects on this species. During a regular WHCC / DPR meeting in 2021, DPR staff informed us about how they manage the toads along trails in the Preserve. Per the DPR's coordination with the Wildlife Agencies, DPR uses:
- exclusionary fencing to keep people away;
 - signs telling people to slow down on the trail;
 - informational kiosks with flyers; and
 - silt fencing to keep the toads from going into the line of traffic.
- DPR installs the latter when toads start appearing on the trails during breeding season. Because there can be unintended negative consequences of exclusionary fencing for reptiles and amphibians, a biologist monitors the at least once daily to keep the toads off the trail. Adding small flags (like landscaping flags) on tall sticks around the outside periphery of the exclusionary fencing can provide extra notice to trail users.
- Please add a mitigation measure with the above measures to address the project's potential direct operational effects on western spadefoot toad.
- (fff) 6. The proposed project would potentially result in operational effects on 44 special status animal species [IS/MND p. 29 (47)] depending on the location of the recreation. However, the documents do not analyze the project's potential operational effects, and therefore the IS/MND provide no mitigation to address them. We request that DPR provide mitigation for such effects on those of 44 special status animal species we have not already otherwise addressed. This mitigation should also address potential indirect effects on these species from the revegetation of the trails proposed to be closed.
- (ggg) 7. One of the DPR's Strategic Initiatives is the *Sustainable Environments SI : Public access that is compatible with the Preserve's role in the MSCP will help protect the Preserve's resources*. And, one of the PAP's goals is to educate visitors about the MSCP and the sensitive resources the Preserve supports. The PAP uses both *informal* and *unauthorized* to describe illegally created trails. The continued use of the euphemistic adjective "informal" to describe unauthorized trails is unfortunate

Attachment 3 to WHCC's Comments on the Sycamore/Goodan Preserve Draft IS/MND & Final RMP 5 of 12

Response to Comment 5-bbb

This comment states that MM-BIO-3 does not address operational effects of the project on coastal California gnatcatcher and requests modification to address gnatcatcher nesting in areas where new trails will be built or experience higher levels of recreation. Indirect operational effects would be covered through the implementation of the RMP's Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element. With regard to CAGN, the RMP includes Management Directive A.2 – Comply with applicable conditions of coverage for MSCP-Covered species, and specifically includes Implementation Measure A.2.1: DPR will implement habitat based and, in some cases, species-specific monitoring and management as outlined in Table 3-5 of the Subregional MSCP Plan and San Diego Multiple Species Conservation Program Covered Species Prioritization (Regan et al., 2006) for all MSCP-Covered Species detected within the Preserve. For the CAGN, the Management Goal is to provide and maintain suitable nesting and foraging habitat for CAGN and ensure the persistence of the species by maintaining populations within the Preserve; the Monitoring Goal is to monitor status, habitat condition, and threats to determine appropriate adaptive management actions to protect CAGN populations within the Preserve. Monitoring is to be completed by evaluating the response of CAGN to management actions; the Monitoring Objective is to document CAGN presence/absence, foraging and nesting behavior, habitat conditions, and potential threats to the species and monitor changes in distribution of natural communities (scrub habitat) and invasive plant species. The methods include: protect known occurrences and occupied habitat of CAGN; and identify and implement appropriate measures to protect occupied habitat and minimize disturbance effects. Appropriate measures may include prioritizing efforts to minimize edge effects, manage invasive plant species, implement fire management, and control unauthorized public access in portions of the conserved land known to support CAGN. Implementation of adaptive management strategies will be based on the monitoring results. Adaptive management will be initiated if field observations and expert judgment indicate a change in management approach is needed. No changes to the IS/MND are warranted.



Response to Comment 5-ccc

This comment requests all trails are closed during the Hermes copper egg-laying period (mid-May through mid-July) unless it is determined prior to each flight season that Hermes copper butterfly are not present. The U.S. Fish and Wildlife Service completed a Species Status Assessment for the Hermes Copper Butterfly (USFWS 2021), which included an evaluation of its biological status. The report concludes that Hermes copper butterfly has been presumed extirpated from Sycamore Canyon and Sycamore Canyon South as a result of the 2003 Cedar Fire. MM-BIO-7, which requires mitigation for permanent impacts to potential Hermes copper butterfly habitat, and MM-BIO-8, which requires Hermes copper butterfly surveys to be conducted prior to construction, provide sufficient protections considering the species has not been documented on the Preserve since 2003. The revegetation mitigation measure (MM-BIO-6) has been revised to include language requiring that a qualified biologist flag sensitive resources, including habitat suitable for Hermes copper butterfly for avoidance prior to implementation/installation.

Additionally, the species will also be addressed through ongoing MSCP compliance. The MSCP Plan and South County Subarea Plan require the use of specific “Adaptive Management Techniques” directed at the conservation and recovery of individual species. The Plan also provides for biological monitoring and preparation of an annual report, which reviews the Plan’s effectiveness. Based upon this review and biological monitoring effort, adjustments in the management and priorities of land can be made as necessary. Management will be based on criteria established by the Framework Management Plan and incorporated into Management Directives.

The MSCP requires compliance monitoring and effectiveness monitoring of habitats and species covered by the MSCP to ensure that the MSCP biological conservation goals and conditions for species coverage are being met. Effectiveness monitoring is conducted by the County through implementation of the Targeted Monitoring Plan (TMP; County 2021) in coordination with regional monitoring efforts.



The monitoring strategy used in the TMP consists of a combination of surveillance-type monitoring (e.g., ongoing assessments of threats and habitat condition, and presence/absence surveys to confirm presence of certain species), baseline condition assessments to determine population-specific threats and conditions, and monitoring to assess the response of a particular species to specific management treatments. The monitoring strategy informs the County's management actions at the individual preserve scale, as well as throughout the MSCP planning area, and ties into the regional management and monitoring strategy. Based on these results, the San Diego Management and Monitoring Program (SDMMP) develops Best Management Practices (BMPs) and regional management and monitoring implementation plans for priority MSCP species and vegetation communities. SDMMP's implementation plans inform the TMP updates as well as annual work plans.

The species also will be addressed through ongoing adaptive management of the Preserve. RMP Implementation Measure A.1.2 provides for periodic monitoring, including that wildlife surveys will be performed during the flight season of Hermes copper butterfly, if feasible. DPR also remains abreast of monitoring and survey efforts conducted by others and would adjust management as necessary if information is presented that indicates that the species is no longer extirpated in the vicinity of the Preserve. Implementation Measure C.4.2 requires that locations of sensitive species impacts be identified through monitoring activities and Implementation Measure C.4.1, provides that fences, gates, and/or signage be installed as necessary in such areas. Implementation Measure C.5.2 provides for temporary trail closures (including to address sensitive biological resource impacts), accompanied by educational support and public notification through signs and public meeting announcements. As the species is presumed extirpated from the Preserve, these efforts provide adequate protection for Hermes copper butterfly and no additional mitigation is necessary. No changes to the IS/MND are warranted.



Response to Comment 5-ddd

This comment requests all trails are closed during the QCB egg-laying period (mid-March through mid-May) unless it is determined prior to each flight season that QCB are not present. As it is not possible to determine the presence of the species outside of the flight season, this suggestion cannot be implemented. Historically, QCB have been recorded within the vicinity of the Preserve, although they were not observed during surveys conducted in 2008, 2012, or 2016. As discussed in the RMP, one adult was observed in 2005 on the ridgeline immediately east of the Sycamore South property, and one adult was observed in 2019 within the southern portion of the existing Slaughterhouse Canyon Trail that is part of the existing formal trail network in the Preserve. Surveys in 2022 did not observe QCB within the survey area. Therefore, it is not expected that there will be impacts to QCB during egg laying or flight season. DPR will continue to implement periodic flight season surveys for QCB as detailed in RMP Management Directive A.1. Indirect operational effects during the egg-laying season would be covered through the implementation of Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element. Implementation Measure C.4.2 requires that locations of sensitive species impacts be identified through monitoring activities and Implementation Measure C.4.1, provides that fences, gates, and/or signage be installed as necessary in such areas. Implementation Measure C.5.2 provides for temporary trail closures (including to address sensitive biological resource impacts), accompanied by educational support and public notification through signs and public meeting announcements. DPR remains abreast of the results of regional survey efforts and will continue to regularly consult with CDFW, USFWS, and other entities as applicable to implement appropriate adaptive management measures. No changes to the IS/MND are warranted.



Response to Comment 5-eee

This comment states that MM-BIO-10 does not address operational effects of the project on western spadefoot toad and requests modification to address recreation-related effects. Operational effects on western spadefoot toad during the breeding season would be covered through the implementation of the RMP's Management Directive C – Public Access Element and Management and Directive D – Operations and Facility Maintenance Element. Management Directive C – Public Access Element requires signs designating areas of sensitive habitat that are not available for recreation, public uses that are prohibited within the Preserve, areas of restricted public access (Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels), temporary trail closures, and educational panels and displays providing information about the surrounding ecosystem. Management Directive C additionally requires that points of unauthorized access and sensitive species impacts will continue to be identified in conjunction with habitat, plant and wildlife, and access road monitoring activities, and DPR will track and limit the number and timing of organized events occurring within the Preserve to help ensure that such events do not substantially alter trail conditions, cause damage to native habitats, or result in adverse conditions for native species. Additionally, Management Directive D – Operations and Facility Maintenance Element requires maintenance of restrooms and trash receptacles, enforces regulations regarding littering/dumping (County Code of Regulatory Ordinance Section 41.116), monitoring of trail use to ensure the integrity of Sycamore Creek is not being affected, and monitoring of potential sites that may erode and installing BMPs to stabilize slopes. As these protections are provided through the RMP as part of the proposed project, significant operational impacts to the species would be avoided and no additional mitigation is necessary. No changes to the IS/MND are warranted.



Response to Comment 5-fff

This comment requests information on the operational and indirect impacts on special status animal species. As described in responses to comments 5(y) and 5(z), operational effects would be addressed through the implementation of The RMP's Management Directive C – Public Access Element and Management Directive D – Operations and Facility Maintenance Element. Implementation of these measures would help to ensure that significant impacts would not occur; therefore, no additional mitigation measures are required. The revegetation mitigation measure (MM-BIO-6) has been revised to require that a qualified biologist flag sensitive resources for avoidance prior to implementation/installation (IS/MND pages 34 and 35).

Response to Comment 5-ggg

DPR appreciates the commenter's acknowledgement of the importance of the role of recreation in DPR's Strategic Initiatives and the PAP. The commenter's concerns regarding the use of the term "informal" in the PAP are acknowledged. The PAP is intended to guide DPR's management of the Preserve and is not intended as a public education document. This terminology is not related to the adequacy of the environmental document and no change to the PAP is warranted. DPR staff regularly maintain barriers and signage to deter unauthorized trail use, and educate users on the importance of staying on approved trails. These ongoing efforts would be enhanced by a number of policies related to unauthorized trails are included in the RMP, such as the following:

Implementation Measure C.1.2: DPR rangers and staff will ensure that prohibited uses (including use of unauthorized trails) are clearly specified on posted signage.

Implementation Measure C.4.1: DPR staff will install additional fencing, gates, and/or signage at points of unauthorized public access as appropriate. Points of unauthorized access will be identified in conjunction with trail monitoring activities.



- (ggg) because “informal” does not convey the fact that the trails were created illegally. The public deserves to know about the vandalism on the Preserve and its repercussions. Therefore, in line with above cited *Sustainable Environments SI* and the PAP’s educational goal, and to help cultivate a sense of stewardship for the Preserve among visitors, we request the addition of a mitigation measure that requires:
- DPR to educate visitors about this vandalism by changing “informal” to “unauthorized” throughout the documentation associated with the PAP;
 - DPR to explain to visitors that (i) creating unauthorized trails is vandalism, (ii) this vandalism damages the vegetation and disturbs wildlife, and (iii) this vandalism occurs to such a degree that it strains DPR’s ability to prevent it from happening and to keep up with remediating the damage caused and the other Preserve protections it is required to provide;
 - doing the same in promotional information about the Preserve, and on signage for the Preserve (e.g., “opportunities for additional educational signage throughout the trail network” - PAP pages 44 and 83);
 - the addition to Section 4.2.1 of the PAP information about unauthorized trails because they present one more opportunity to educate the public about the natural resources the Preserve supports; and
 - that the Visitors Center provide information about unauthorized trails.

Information from the Recreation Ecology Literature

(hhh) One of the explanations provided in the IS/MND for why the project’s impacts on the wildlife species are less than significant is that they are “highly mobile animals.” This is always stated only in the context of the trails themselves, not the recreation that would occur on the trails (i.e., without consideration of the recreation-related operational effects on the wildlife). A prevalent theme in the recreation ecology literature is that causing animals to disrupt their daily activities can negatively affect them. This is especially true if the disruptions involve: expenditure of energy; interference with breeding, foraging, or resting; or causing wildlife to continually contract or expand their territories. The more the disruptions occur, the more negative the effects, and chronic disruptions can eventually lead to disruptions to wildlife communities and wildlife populations. Therefore, the explanation that impacts on the wildlife species are less than significant because they are “highly mobile animals” is inadequate with respect to recreation.

The following information supports the paragraph above and the comments in our letter.

Animal movement

Refer to article at [Human disturbance causes widespread disruption of animal movement Doherty et al. 2021](#) and the information at [Movement Ecology Journal - query "recreation"](#).

Trail-related disturbance: fragmentation, edge effects, and expansion of the effect zone

Comment #4A in the letter addresses the proposed trails in the northern parcels and mentions effect zones that permeate the areas the loop trails surround; for information on this, please refer to page 98 (3) in the article at [A review of trail-related fragmentation etc in protected areas](#).

Implementation Measure C.4.2: Points of unauthorized access and sensitive species impacts will continue to be identified in conjunction with habitat, plant and wildlife, and access road monitoring activities (as described in implementation measures A.1.1, A.1.2, A.1.3 and C.4.1). DPR will ensure that any installation of fences or gates will be designed and located so they do not impede wildlife movement or impact cultural resources.

Implementation Measure C.4.3: Fencing, gates, boulders, security patrols, and appropriate signage will be needed to enforce the restriction of public access to the Southern Parcel, Southern Gap Parcels, and San Vicente Connector Parcels.

Implementation Measure C.5.1: DPR staff will monitor public access roads, staging areas, and trails for degradation and restrict off-trail access and use, and provide necessary repair/maintenance per the Community Trails Master Plan (County of San Diego 2009a). Any trail maintenance performed must ensure that the trail remains suitable for each multi-user group (hike, bike, equestrian) allowed on the trail.

Implementation Measure C.5.4: If unauthorized trail formation is observed by DPR staff, those specific areas will be posted with barriers and clear signage reminding the public to remain on authorized trails. DPR staff may also deconstruct and restore unauthorized trails. Also, see management directive C.4.

Response to Comment 5-hhh

This comment states that the IS/MND’s discussion of impacts on wildlife species is inadequate with respect to recreation. Please refer to the responses to comments 5(y), 5(z), and 5(bb) with regard to the analysis of operational impacts on wildlife. No changes to the IS/MND are warranted.



(iii)

Do studies on the recreation-related effects on common species inform us about sensitive species?

Research on recreation-related effects on wildlife includes few species of conservation concern (Larson et al. 2016). However, sensitive species may experience greater levels of recreation-related disturbance than described for common species in the literature of studies in recreation ecology. This is because many rare and isolated species are specialists, and they may be more sensitive to anthropogenic disturbance, including recreational activities, than common and widely distributed species (Bennett et al. 2013; Reilly et al. 2017). Recreation-related declines of common species warrant attention because of their functional ecological importance - local depletions of common species can have broad consequences within the food web (Säterberg et al. 2013; Baker et al. 2018; Reed et al. 2019). Recreation-related declines or disturbance in an important common prey species may affect the species in higher trophic levels (Reed et al. 2019). More than a quarter of species become functionally extinct before losing 30% of their individuals (Säterberg et al. 2013; Baker et al. 2018; Reed et al. 2019). Disruptions to any species within a wildlife community can reverberate throughout the community, as well illustrated under the heading *Responses to human voice* below.

Study done in 14 NCCP/HCP preserves in San Diego County

In a study to systematically assess recreationists' direct and indirect effects on sensitive wildlife species in 14 NCCP/HCP protected areas in San Diego County, Reed et al. (2019) integrated monitoring of both wildlife species and recreationists (e.g., hikers, mountain biker, horseback riders). Using data from camera traps and BACI experiment, Reed et al. found that bobcat, gray fox, mule deer, and northern raccoon were less active in areas with higher levels of human recreation.

Bobcat habitat use was more strongly negatively associated with human recreation than urban development, which also decreased the probability of habitat use. The collective results for mule deer among the four studies suggest that mule deer may stop using some areas altogether if human recreation is too high. Reed et al. (2019) did not detect negative associations between human recreation and the habitat use or relative activity of the six following mammalian species of the 12 observed: coyote, striped skunk, ground squirrel, jackrabbit, brush rabbit and desert cottontail. However, of special note are results from the protected area with the highest level of recreation (i.e., an average of 1,797 people per day) observed in the study, where the cameras captured only rabbits, and no other mid-to large-bodied wildlife species during 7.5 weeks of monitoring. Yet, this 2,449-ha protected area [Mission Trails Regional Park] is considered a core biological area and regional wildlife corridor targeted for conservation (City of San Diego 2019). The BACI experiment conducted in another protected area showed a significant decrease in bobcat detection probability in a four-week period following a trail re-opening, suggesting that this species can modify its behavior (e.g., shift its activity patterns) rapidly after a change in human recreation. This is evidence that temporal closures have the potential to reduce disturbance during critical periods for some species. Although human recreation may not often extirpate mammalian species from urban habitat fragments, it can reduce habitat suitability and carrying capacity (Reed et al. 2019). The authors also found that recreation was associated with declines in reptilian species' richness, occupancy, habitat use, and relative activity in the NCCP/HCP protected areas. Of the three species (all lizards) for which statistical analyses were feasible, two exhibited negative relationships between occupancy and human recreation—the orange-throated whiptail (an MSCP covered species) and common side-blotched lizard.

The authors concluded that, "Ultimately, for animals that avoid human activity, it is unlikely that dual-use protected areas will be entirely sufficient, and limiting recreation in strategic locations and circumstances will be necessary to achieve conservation objectives." Two of the authors, Reed and Larson, provide further insights in grey literature at [Don't hike so close to me: How the presence of humans can disturb wildlife up to half a mile away 2021](#).

For more information about this study, refer to https://sdmmp.com/view_project.php?sdid=SDID_201612021615.115.

Response to Comment 5-iii

This comment provides background information and research links in support of previous comments. This comment does not address the adequacy of the IS/MND and no change to the document is warranted. Please also refer to the responses to other comments related to this topic.



(iii)

Study done in NCCP/HCP preserves in Orange County

In series of three studies about the responses of mammals to hikers and runners, bikers, horse- back riders, dog walkers, and motorized vehicles, George and Crooks (2006), Patten et al. (2017), and Patten and Burger (2018) analyzed camera-trap data captured throughout areas protected under the 1995 County of Orange Central and Coastal NCCP/HCP (Orange County NCCP/HCP). All studies analyzed bobcat, coyote, and mule deer, and Patten et al.'s (2017) analysis also considered mountain lion, gray fox striped skunk and northern raccoon. The authors found that: (1) mammal detections were negatively correlated with all types of recreationists; hikers and runners had the greatest negative association with wildlife, and equestrians had the least; (2) the overall trend is sharply negative: as human activity increased, mammalian activity decreased, regardless of species, type of human activity, or camera placement; (3) mammals were nearly four times as likely to be detected on days with no human activity than on days with human activity at the same site; (4) detections of mammals decreased incrementally as the number of humans increased within a day, and fell to near zero probability at >60 humans per day; and (5) all seven species listed above exhibited short-term spatial displacement in response to events with more than 100 visitors.

Bobcats' negative associations were strongest with bikers, hikers, and domestic dogs. In areas of higher human activity, bobcat were detected less frequently along trails and appeared to show temporal displacement, becoming more nocturnal. Coyotes' overall activity was lower at the sites with the most recreation and was negatively associated with overall human, hiker, and biker visitations; and, a trend of temporal displacement in response to dogs was also evident. Generally, both bobcats and coyotes displayed a relatively wide range of activity levels at sites with low human use, but a lower and markedly restricted range of activity at those sites with the highest levels of recreation. Both coyotes and mule deer shifted their activities temporally over the long term. The mule deer's (a primary consumer) marked shift brought it into closer temporal alignment with its main predator (mountain lion) and the coyote's marked shift (secondary consumer) brought it into closer temporal alignment with a chief prey species (gray fox). These human-induced diel shifts involving animals in two trophic levels have important ramifications for predator-prey dynamics.

Despite these studies' results, no evidence was found suggesting mammalian populations have declined in the Orange County NCCP/HCP protected areas between 2007 and 2016, even as human activity increased markedly across the study period. However, it is important to consider this observation in light of: (1) the fact that, at least for the years 2007-2011, public access was controlled across most of the study area by permit-only entry, regular docent-led programs, and monthly self-guided wilderness access days - much stronger restrictions on public access than for most protected areas; (2) the authors' assertion that various mammalian species' avoidance behavior may yet drive mammalian populations downward upon further increase in human disturbance; and (3) the status of the Vail Colorado elk herd as recounted below under Ungulates - once a herd of 1,000 head diminished to 53 due to steadily increasing levels of recreation.

Eagles

In a study along the Boise River in Idaho examining flight initiation distances of bald eagles in response to actual and simulated walkers, joggers, anglers, bikers, and vehicles, found that the highest frequency of eagle flushing was associated with walkers, followed by anglers, bikers, joggers, and vehicles Spahr (1990). Eagles were most likely to flush when recreationists approached slowly or stopped to observe them, and were less alarmed when bikers or vehicles passed quickly at constant speeds. However, the longest flight initiation distance was in response to bikers, followed by vehicles, walkers, anglers, and joggers. Hennings' (2017) literature review provides the following about bald eagles: pedestrians within 275 m caused a 79% eagle response rate; eagles did not resume eating for four hours after disturbance by walkers; a suggested minimum 600-m buffer around breeding eagles, beyond which response frequency dropped below 30%; an apparent threshold of about 20 daily recreational events after which eagles were slow to resume feeding,



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and after 40 events, feeding was uncommon; sub-adults were less tolerant of disturbance than adult eagles; and recreation-related long-term effects can include reductions in survival, particularly during winter and especially for juveniles.

With respect to the tolerance (through habitat imprinting, genetic inheritance, or habituation) of golden eagle for recreational disturbance, Pauli et al. (2017) used an individual-based model to assess the effects of walkers and off-highway vehicles on golden eagle populations. The primary modeling results indicated that, while golden eagles can develop tolerance for recreational disturbance, tolerance for even moderate levels of disturbance may not develop within a population at a sufficient rate to offset the effects of increased recreation on breeding golden eagles, particularly because this is a long-lived species with low recruitment. Pauli et al. (2017) conclude that, taken together, the simulation results suggest that recreation-related disturbance has a substantial effect on golden eagle populations and that increased recreation activity will exacerbate such effects. Given the results and the fact that non-motorized recreation decreases the probability of egg-laying in golden eagles (Spaul and Heath 2016), the authors asserted that trail management and a reduction in recreation activities within eagle territories are necessary to maintain golden eagle populations in locations where levels of recreation are increasing.

Responses of the common wall lizard to tourism

In a study of common wall lizards conducted in areas with high and low levels of tourism within the same habitat in the Guadarrama Mountains in central Spain, Amo et al. (2006) examined whether the lizards differed in several parameters upon each human approach. The authors found that: (1) regardless of the level of tourism, lizards usually exhibited anti-predator behavior by fleeing to hide in refuges upon approach of a human; (2) in comparison to lizards inhabiting areas of low tourism pressure, lizards inhabiting areas with high tourism pressure, and therefore presumably escaping to hide in refuges more often, showed a poorer body condition and higher intensity of tick infection at the end of the breeding period; and (3) the intensity of tick infection was higher in male than in female lizards. The authors speculated that the higher intensity of infection probably resulted from the cumulative costs of high frequency of flight, since anti-predatory behaviors such as flight are costly in terms of losing time for other activities, including feeding - nutritional status can affect the capacity.

Butterflies

In a study of the effects of walkers, runners, and runners with dogs on the federally endangered Karner blue butterfly (Karners) at the Indiana Dunes National Lakeshore, Bennett et al. (2013) found that (1) Karners flushed in the presence of recreationists as they would respond to natural agents, such as predators; (2) recreation restricted host-plant choice by reducing host-plant availability, effectively rendering the quality of habitat within 10 m of the trail unsuitable; (3) recreation had the potential to reduce oviposition rate of virtual females by 50%, and therefore population growth rates; (4) the frequency at which recreationists negatively affected the females (including their oviposition) varied substantially with habitat extent, number of recreationists, and sensitivity; and (5) habitat extent was the primary predictor variable. The authors concluded that Karners will experience less recreation-related disturbance the farther their habitat extends beyond trails.

Responses to the human voice

Suraci et al. (2019) tested whether mammalian carnivores' responses to human voices alone can result in landscape-scale effects across wildlife communities, including cascading effects on the behavior of lower trophic level animals. The results of the study, which was conducted in the Santa Cruz Mountains of central California, indicate that human voice alone does result in such effects. Where humans are absent or rare,



(iii)

large and medium-sized carnivores exhibit greater movement, activity, and foraging, while small mammals use less space and forage less. Where humans are present, the activity, foraging, and/or habitat use of large and medium-sized carnivores are suppressed, while small mammals increase their total space use and foraging intensity.

The implications of these results are far-reaching, and include that, even in the absence of land development or habitat fragmentation, increased human presence can: (1) affect large carnivore movement, which could eventually limit carnivores' hunting and feeding behavior or force individuals to abandon high risk areas of their home range; (2) suppress activity of medium-sized carnivorous species; and (3) increase the abundance of small mammals that are prey to the large- and medium-sized predators, which could ultimately increase the abundance of small mammals in wildlife areas people visit (Suraci et al. 2019, citing other authors). Moreover, if the sublethal effects observed in the study in response to human voices alone are comparable to those effects (e.g., increased physiological stress, reduced reproductive success) that fear has been demonstrated to cause in predator-prey systems, they may amount to additional widespread but largely unmeasured effects of humans on wildlife populations (Suraci et al. 2019, citing other authors). Hennings (2017) provides additional insights about and citations for studies on the effects on wildlife from the human voice, concluding that conversational noise along trails can be very disturbing to wildlife.

Unulates

This information is provided because mule deer occur on the Preserve; the eastern border of the Preserve is remote, prime historical bedding and breeding deer habitat. Unfortunately, corridor constraints from SR-67, Scripps Poway Parkway, and internal Sycamore Park Drive are already detrimental to wildlife movement (*San Diego Tracking Team wildlife surveys 2003-2023*). The account below provides insights about the effects to elk from chronic exposure to humans recreating.

In a two-year study of an elk herd near Vail in central Colorado, Shively et al. (2005) found that elk reproductive success rebounded to pre-disturbance levels after the cessation of their exposure to back-country hikers during the calving season over the previous three years. The study provides evidence that elk reproduction can rebound from depressed levels when human disturbances are removed or reduced. However, there had been a linear decline in calf production in response to increasing levels of disturbance compared to controls without such disturbance; and, it is not known if there is a threshold level of reproductive depression from which elk cannot recover. Recognizing that it is seldom easy to curb human activities that have become traditional, or to restore wildlife habitats once they have been developed, Shively et al. concluded that, it seemed prudent to protect elk during calving seasons, and they recommended the continuation of some closures imposed on parts of both the Vail and control elk herd study areas. However, it was reported in 2019 that the number of elk in this same Vail herd dropped precipitously since the early 2010s with the steady increase in human recreation; once a herd of 1,000 head of elk, it had decreased to 53 at last count in February of 2019. A 2019 article in the grey literature explains that, for one of the authors of the 2005 study, there is no explanation other than the increased levels of hiking, biking, and skiing in the area that supports this elk herd (Peterson 2019). This outcome adds to the already ample evidence that pregnant animals or those with young - especially mammals - are particularly sensitive to human disturbance (Hennings 2017).

For more studies in the recreation ecology literature, please refer to:

- the literature cited section of the article at [Recreation-related disturbance to wildlife - better planning for & management of recreation are vital to conservation in protected areas](#);



(iii)

- [Hiking, mountain biking and equestrian use in natural areas: A recreation ecology literature review 2017;](#)
- SD MMP's website at the following hyperlinks, some of which are slow to load.

https://sdmmp.com/upload/threats/threats_background/MSP%20Vol2B%20HumanUse%202017_1494454044.pdf

https://sdmmp.com/view_project.php?sdid=SDID_201612021615.115#files-documents-tab

https://sdmmp.com/view_threat.php?threatid=TID_20160304_1452#overview-tab

https://sdmmp.com/tracker.php?Target=threat&Species=TID_20160304_1452&ActionStatus=&ManagementUnit=&ObjectiveType=&Year=&Preserve=&Short=Long&submit=Submit

Conclusion

(jjj)

We have provided DPR information about assessing the effects of recreation. If the TMP and RMP are indicative of what DPR intends to do to assess the recreation-related operational effects on wildlife, we have concerns. Decisions now about: if and where to site trails on MSCP Preserves; what types, levels, and timing (diel, seasonal) of recreation are acceptable; and how to manage the recreation should be based on the current science in the field of recreation ecology because what may have been considered conditionally compatible in 1997 is likely to warrant more constraints/limitations than we thought back then.

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(kkk)

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Response to Comment 5-jjj

This comment is a concluding statement that summarizes concerns regarding recreation-related operational effects. Please refer to the responses to specific comments with regard to these concerns. No changes to the IS/MND are warranted.

Response to Comment 5-kkk

This comment provides literature cited in the comment letter. It does not address the adequacy of the IS/MND and no change to the document is warranted.



(kkk)

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Attachment 4

Comments on the Final Resource Management Plan (July 2023) for the Sycamore Canyon/Goodan Ranch County Preserve (comment #8a in the letter)

(III)

While the cover page of RMP identifies it as a final document, the text of the document states that it will be periodically revised (Page 4: "It is anticipated that the recommended management actions provided in this RMP will be dynamic in nature...RMP will be revised once every ten years, as needed. The RMP may be revised on a shorter time scale if there is a change in conditions..."). Our comments provide reasons for clarifying or revising the document - preferably in conjunction with changes per the IS/MND review and approval process - but no later than when the County determines that additional revisions are necessary. Our comments focus on biological concerns.

(mmm)

Page 3. Section 1.1.3 Framework Management Plan and Management Directives. We agree that this RMP is to be prepared consistent with the MSCP agreement and the guidance in Table 3-5 of the MSCP. However, the MSCP framework guidance assumed that individual preserves would prepare their management plans to reflect the framework guidance, unique characteristics of the preserve, and adaptively revise those plans as new data and techniques are developed (within the scope of the MSCP agreements). Over the nearly 25 years since the first MSCP preserves were approved, preserve managers, researchers and users have significantly more information about how to identify, monitor and address management threats. In particular, the direct and indirect effects from recreation (both active and passive) are creating more impacts than what was assumed during at the inception of the MSCP - and this information and integration into implementation practices must be a commitment of the RMP.

(nnn)

Page 4. Section 1.2.1. Management Approach. We support the use of adaptive management techniques to address the uncertainties that arise from managing preserve lands that will be subject to many potentially threats such as climate change, public use, wildfire, drought, etc. However, and as we describe later in these comments, adaptive management must be based on appropriate monitoring with respect to area/species of interest, methods, and frequency. Changed conditions may require the County to revise both its management techniques as well as its monitoring approach - for example a wildfire or sustained drought may require vegetation (habitat) monitoring to be conducted before the next 10-year planned assessment.

(ooo)

Page 12. Section 2.5. Trails: currently the Preserve has about 12 miles of formally designated trails roads and trails. It is proposing to increase that to 21.7 miles of formal trails and roads, including 15.09 miles for bikers/e-bikers, hikers, equestrians; A total of 16.93 miles of existing formal trails, informal trails, and access roads would remain open, and 4.77 miles of new trails and trail connections are proposed (Figure 8b, Public Access Plan Trail Segments). As described below, the proposed network of new and to-be-formally authorized (currently unauthorized) trails will result in significant, unmitigated impacts that conflict with the intent of and commitments made pursuant to the MSCP.

(ppp)

Figures 8Aand 8B illustrate a new network of trails within the Preserve, particularly in the northern parcels (Wu, Hagey and upper Slaughterhouse/Clark canyon drainage). These portions of the Preserve, based on the biological resources mapping in the RMP, have large, intact patches of sage scrub, supporting the most biodiverse and densely populated sensitive species locations. Ironically, they also have the most dense invasive species locations (presumably from unauthorized/unmaintained trails/old roadways).

(qqq)

Based on the RMPs own biological mapping, there is strong evidence for removing many of the proposed trails in Wu (2015 Northern addition), Cielo (2015 Southern addition), Hagey (Sycamore North), and the

Response to Comment 5-III

The comments contained in this attachment specifically pertain to the RMP, not the IS/MND. Nonetheless, responses are provided for informational purposes. An RMP is considered "final" for a period of time and then periodically updated as appropriate and necessary. The remainder of this comment is introductory in nature; please refer to the responses to specific concerns that follow. No changes to the IS/MND are warranted.

Response to Comment 5-mmm

This comment summarizes the expectations for preparation of RMPs and indicates that the RMP should integrate more recent information regarding the potential effects of recreation. Consistent with this comment, the RMP for the Preserve has been prepared to reflect the framework guidance, unique characteristics of the Preserve, and adaptive revisions based on new data and techniques. As noted in the RMP, the County is an active participant with SDMMMP in the development of revised monitoring methods for the Subarea Plan. No changes to the IS/MND are warranted.

Response to Comment 5-nnn

This comment indicates the importance of basing adaptive management on appropriate monitoring. It is acknowledged that changed conditions that would require DPR to revise its management techniques and monitoring approach, and this is envisioned in the RMP. Specifically, Implementation Measure A.1.1 requires, "DPR will conduct habitat monitoring at ten-year intervals within the Preserve or after a change in conditions (e.g., fire, drought)". No changes to the IS/MND are warranted.



Response to Comment 5-ooo

This comment expresses concerns that the proposed trail network will result in significant, unmitigated impacts to biological resources, in conflict with the MSCP. Please refer to response to comment 5(q) with regard to the extent of new versus closed trails proposed and to response to comment 5(y) with regard to concerns about effects from these trails. As explained throughout these responses, the effects of public use would be less than significant as a result of the management measures included as part of the proposed project. No changes to the IS/MND are warranted.

Response to Comment 5-ppp

This comment states that trails in the 2015 Northern Addition, Sycamore North, and original northern parcels of the Preserve contain both the most biodiverse and densely populated sensitive species locations, as well as the most dense invasive species locations. Upon review of the baseline report for the parcels in the north, sensitive plant species are sporadic, occur as individual points, and are not densely populated. None of these plants observed on these parcels are listed by the FESA or CESA. Sensitive wildlife species on the northern parcels are concentrated around sampling locations and do not represent densely populated areas of wildlife. Invasive non-native plant species documented on the northern parcels are also spaced sporadically and do not occur in association with existing trails. No changes to the IS/MND are warranted.

Response to Comment 5-qqq

This comment suggests modifications to the trail network in the northern portion of the Preserve and Trail 22. Project impacts related to proposed trails would be mitigated per the BMO, MSCP Subarea Plan, and other applicable County requirements. Although it is acknowledged that a single trail alignment would decrease mitigable biological impacts, public access also is an important element of DPR's mission. Please refer to MR-1 regarding the process undertaken to identify proposed trail alignments. No changes to the IS/MND are warranted.



(qqq)	<p>“airplane ridge” area (trails 22 and 25). We believe that a single trail alignment, from the proposed SR67-SPP trailhead to the Preserve’s existing trail system (near trail 9) may be justifiable and mitigable.</p> <p>In reviewing the trail maps (8A and 8B), vegetation/plant maps (10a; 12 a, b, c), and wildlife maps (13 a, b, c), we agree with the currently labeled “remove/restore” trail/road segments. Regarding new/newly formalized trails, there is substantial biological evidence to warrant removing certain new/newly authorized trails/trail segments, including #3; #4 (the stub); #5 (western portion connecting to #3 and #6 and east portion to the stub); #6 (the western alignments/loop connecting to #3 and #5; a small segment may be necessary to connect to segment #7?); and # 22 (at least from the junction with #25 southward, including 22a and 22b); leave one N-S segment of #26 to connect with a SR 67/SPP trailhead access and the reduced segments listed above.</p>
(rrr)	<p>The mapping data indicate that the only recent CAGN locations are in the Wu/Hagey parcels, and a large network of formal trails and increased throughout those habitat areas poses a significant impact to this and other MSCP covered species. In addition, there are sensitive plants throughout those parcels and invasive species (Moderate Priority for removal) that would likely increase with additional access/use/disturbance. Trail 22 (and 22a and 22b) would be located near a mule deer location (Wu/Hagey also have mule deer locations). The lower portion of trail 22 shows essentially no invasive species, and locating a trail there will increase invasive species as a result of use/disturbance.</p>
(sss)	<p>Trail #15 and the southern end of Sycamore Parkway dirt road, terminate with no approved connections internally to the trail system or to authorized trails outside the Preserve, which would likely lead to rogue trails being created, if not regularly policed and any attempts to create informal/unauthorized trails stopped.</p>
(ttt)	<p>Pages 62-63. Section 3.4. Overall Biological and Conservation Value. We concur with the general statements noting that the Preserve is mostly high to very high value habitat. Also the north parcels/ridgelines that support important grasslands and sensitive species.</p>
(uuu)	<p>Page 98. Implementation Measure A.1.1. The proposed monitoring 10-year interval for habitat (i.e., vegetation community) status and changes that may require adaptive management should add two conditions: the monitoring frequency may be modified/increased to respond to (1) large-scale wildfires on the preserve and/or (2) if the SDMMMP regional effort determines that climate change effects on San Diego County vegetation communities warrant more frequent monitoring.</p>
(vvv)	<p>Page 99. Implementation Measure A.1.2 The proposed 10-year interval for monitoring general wildlife and rare plants should add that species-specific monitoring frequency may be modified/increased if (1) the 10-year monitoring determines that a species’ status has seriously declined and/or if (2) if the SDMMMP regional effort determines that climate change effects on San Diego County vegetation communities warrant more frequent monitoring.</p>
(www)	<p>Page 99. 5.2.2 MSCP-Covered Species-Specific Monitoring and Management. The introduction to covered species monitoring and management should add that the individual species discussions assume that monitoring frequencies and management responses are separate from the general monitoring approaches and frequencies as described in Implementation Measures A.1.1 and A.1.2. Also, if the species monitoring and/or management warrants active interventions, then those actions will be monitored at the appropriate frequency. The species-specific monitoring and management sections appear to follow the MSCP requirements and guidance.</p>

Response to Comment 5-rrr

This comment expresses concerns regarding potential biological resource impacts from the proposed trail network. Mitigation for CAGN and sensitive plants are detailed in the IS/MND, and RMP Management Directives additionally will protect CAGN and sensitive plants during operation. Management Directives would control invasive non-native plants identified during monitoring or patrols. While some trails occur nearby mule deer sighting locations, these are far ranging species that may utilize the expansive open space throughout the rest of the Preserve. No changes to the IS/MND are warranted.

Response to Comment 5-sss

This comment expresses concern regarding connectivity of Trail 15 and the potential to result in creation of unauthorized trails. Trail 15 ends at the Preserve’s original boundary and does not extend into the unsurveyed southern parcels. Because the southern parcels have not been surveyed, trails cannot be adequately sited such that sensitive resources are avoided or impacts to sensitive resources are minimized/mitigated. RMP Management Directives would ensure barriers are placed at the terminus of the trail and regular patrols and monitoring would determine if additional adaptive measures are required to stop the formation of unauthorized trails. No changes to the IS/MND are warranted.

Response to Comment 5-ttt

The commenter concurs with the information contained in RMP Section 3.4. This concurrence is acknowledged. No changes to the IS/MND are warranted.



Response to Comment 5-uuu

This comment suggests the potential need to modify the proposed monitoring frequency for habitat. Implementation Measure A.1.1 as originally written states, “DPR will conduct habitat monitoring at ten-year intervals within the Preserve or after a change in conditions (e.g., fire, drought).” Thus, the potential need to adjust monitoring schedules in response to large-scale wildfires is already acknowledged. This measure has been modified to also indicate that the monitoring frequency may be modified/increased if regional monitoring efforts determine that climate change effects on San Diego County vegetation communities warrant more frequent monitoring. No changes to the IS/MND are warranted.

Response to Comment 5-vvv

This comment suggests the potential need to modify the proposed monitoring frequency for wildlife and rare plants. Implementation Measure A.1.2 has been revised to reflect that species-specific monitoring frequency may be modified/increased if (1) the 10- year monitoring determines that a species’ status has seriously declined and/or if (2) if regional efforts determine that climate change effects on San Diego County vegetation communities warrant more frequent monitoring. No changes to the IS/MND are warranted.

Response to Comment 5-www

This comment suggests modifications regarding covered species-specific monitoring and management. Section 5.2.2, MSCP-Covered Species-Specific Monitoring and Management, has been revised to clarify that monitoring frequencies and management responses for some special-status species are separate from the general monitoring approaches and frequencies as described in Implementation Measures A.1.1 and A.1.2. If the species monitoring and/or management warrants active interventions, then those actions will be monitored at the appropriate frequency. Commenter’s concurrence that species-specific monitoring and management sections follow MSCP requirements and guidance is acknowledged. No changes to the IS/MND are warranted.



(xxx)	Page 121. Implementation Measure A.4.1. This section should add that the proposed 10-year monitoring frequency for invasive wildlife species may be modified/increased if other species-specific monitoring or routine preserve management observation indicate that serious negative effects are occurring.
(yyy)	Pages 124, et seq. 5.4. PUBLIC ACCESS ELEMENT. The introduction recites that “The Preserve currently contains approximately 5.56 miles of formal trails and 6.61 miles of access roads suitable for trail use.” and then proposes that the RMP will authorize some informal trails and “4.77 miles of new trails and trail connections are proposed”, such that the total public use road/trail system will total 21.7 miles. That is nearly doubling the currently authorized publicly accessible trail/road system. As stated previously, we believe there is sufficient, substantial evidence for removing several of those new trails and/or newly authorized informal trails that will have predictable and significant impacts to covered species or other sensitive species.
(zzz)	Pages 125-126. Management Directive C.2 – Manage public access in sensitive biological and cultural resource areas within the Preserve (Priority 1). Both Implementation Measures C.2.1 and C.2.2 assume that the County will access, analyze, and appropriately interpret data to determine how/where public access will not significantly impact sensitive resources. This section needs to add that the analysis must use the most currently available scientific information regarding recreation/use effects (e.g., California Fish and Wildlife, Recreation Special Issue; 6-10; 2020) and preserve data to determine where/when public access, including the siting of new trails or newly authorized informal trails.
(aaaa)	Pages 126-127 5.4.2 Fencing and Gates. Gates (with appropriate signage) should be installed where there is no access to/from the private lands onto the Preserve. Fencing, or other barrier materials should be placed at the beginning/end of where trails are to be removed and revegetated. This is particularly necessary where an authorized trail intercepts a to-be-removed trail.
(bbbb)	Pages 130-131. Management Directive D.6. – Coordinate with adjacent landowners and open space land managers (Priority 1). The RMP must make clear that none of its trails are intended to provide – now or in the future – a multi-use connection to the Scripps Poway Parkway wildlife tunnel. That tunnel is NOT a general public use/access trail, and is limited wildlife and to equestrian access. The Sycamore-Goodan Preserve JPA group must collaborate to ensure the RMP does not encourage or facilitate a multi-use trail connection to the wildlife tunnel.

#####

Response to Comment 5-xxx

This comment suggests the potential need to modify the proposed monitoring frequency for invasive wildlife species. Implementation Measure A.4.1 has been revised to include that the proposed 10-year monitoring frequency for invasive wildlife species may be modified/ increased if other species-specific monitoring or routine preserve management observation indicate that serious negative effects are occurring. No changes to the IS/MND are warranted.

Response to Comment 5-yyy

This comment suggests removing several trails that are included in the proposed trail network. Please refer to response to comment 5(q) with regard to the extent of new versus closed trails proposed and to response to comment 5(y) with regard to concerns about effects from these trails. As explained throughout these responses, the effects of public use would be less than significant as a result of the management measures included as part of the proposed project. No changes to the IS/MND are warranted.

Response to Comment 5-zzz

This comment indicates that the RMP should state that analysis of public access should use the most current available scientific information and preserve data. The County is an active participant in regional monitoring efforts and committed to using the best information available to make land management decisions. This is fundamental to all operations and does not warrant particular mention in the noted implementation measures. No changes to the IS/MND are warranted.



Response to Comment 5-aaaa

This comment provides recommendations regarding fencing, gates, and signage. Section 6.3.4 of the PAP includes “barriers to deter recreational users from entering or exiting the Preserve on unauthorized trails and from using unauthorized trails within the Preserve.” MM-BIO-6 has been revised to include “Revegetation will be accomplished by a combination of barricade and sign installation...” and Implementation Measure C.5.4 in the RMP has been revised to state that access control will occur at the beginning and end of where trails to be removed/revegetated occur. No changes to the IS/MND are warranted..

Response to Comment 5-bbbb

This comment expresses concern related to trail connectivity to the Scripps Poway Parkway tunnel. The proposed project’s Public Access Plan (PAP) identifies South Raptor Loop Northwest (Trail 4) as a potential future trail connection which leads to the Scripps Poway Parkway tunnel. As noted in the PAP, this trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Until legal access is available, DPR would use signage and potentially barriers, as appropriate, to prohibit access. It should also be noted that trail segments 1 and 2, which are the closest to the Scripps Poway Parkway wildlife tunnel, would be closed to be revegetated. No changes to the IS/MND are warranted.



Wildlife and Habitat Conservation Coalition

Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.

April 29, 2019

Melanie Tylke
County of San Diego, Parks and Recreation
5500 Overland Ave, Suite 410
San Diego, CA 92123
[via email only](#)

Subject: Environmental Groups' Comments on the Current Maps for the
Sycamore Canyon - Goodan Ranch Preserve Public Access Plan (PAP)



Dear Ms. Tylke:

(CCCC)

The Wildlife Habitat and Conservation Coalition (WHCC) is a group of Southern California-based conservation organizations with more than 25,000 members collectively. Representatives of a subset of these organizations have continued to participate in the County's Parks and Recreation (DPR) process for the above-referenced PAP since we sent the attached August 16, 2018, letter about the PAP.

We thank DPR for both the stakeholder meeting on February 22, 2019, during which the County provided an update on its PAP process to date, and the 2nd public workshop on March 28. We are disappointed that, based on our review of the information provided during the workshop and subsequently online, little of significance has changed for the better (from our perspective) from the first versions of the PAP maps - the current maps generally do not address the concerns we have raised. Some changes reflect indirect acknowledgement of the unauthorized trails on the Preserve (e.g., changing "Existing to Remain" in the map legend to "Proposed Trail on Existing Disturbed Areas"), but these hardly meet our request for clarity about where unauthorized trails have been created (refer to comments #4 and #6 on page 5 of the attached August letter). In addition, the maps still inappropriately depict trails dead-ending at the boundary of the Preserve or extending onto off-site private property.

Regarding the trails proposed to be closed and revegetated, please refer to comments #2 and #3 on pp. 4 - 5 of the attached August letter - they address when mitigation credit might be appropriate for the revegetation. The added trails representing "Proposed CTMP Trail" are further concerning, in part because they will add additional uncontrolled access points and encourage the creation of more unauthorized trails in the future. In addition, previous maps showed the surrounding conserved lands; we ask that this layer be restored, at least on some of the maps. And, confusingly, some maps depict trails as proposed (MAP 1 series) that other maps (MAP 2 series) depict as "Closed to be Revegetated."

Recently, we learned that the City of Poway acquired the parcels immediately to the north and south of the wildlife tunnel/undercrossing under Scripps Poway Parkway (SPP) for mitigation for the SPP Project. The City is required to record conservation easements over these lands in favor of the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service. Because the easements have not yet been prepared, much less recorded, we believe that the County should not presume any trail connection to the wildlife tunnel/undercrossing, other than one constructed to facilitate wildlife movement and as well as equestrian use in the area, consistent with the language in the CEQA documentation for the SPP Project. Therefore, we

Response to Comment 5-cccc

This comment consists of previous correspondence regarding the project. It does not directly address the content of the environmental document and no changes to the IS/MND are necessary. Nonetheless, responses are provided for informational purposes.

The proposed PAP was developed through detailed analysis of opportunities and constraints, as well as extensive engagement with a wide variety of stakeholders between 2016 and 2023. This engagement included two public workshops and approximately 25 focused stakeholder meetings. DPR considered all public comments and recommendations during development of the conceptual trail alignments and trail map. DPR's goal was to utilize a fair planning approach that considers all user groups, including hikers, individuals with mobility limitations, mountain bikers, and equestrian groups, as well as provides for the protection of sensitive natural resources.

Please refer to responses to comments 5(n) and 5(o) with regard to existing trails in the Preserve and mitigation credit for revegetation of such trails. Potential future trail connections to off-site properties would only be constructed if legal access is provided to the off-site properties. If there is no legal access, these trails would not be authorized. DPR will continue to enforce Preserve regulations and patrol for unauthorized access. Implementation Measure C.5.1 provides that DPR will monitor trails for degradation and provide necessary repair and maintenance, and Implementation Measure C.4.1 states that DPR rangers may install fencing, gates, and/or signage at points of unauthorized public access.

Please refer to response to comment 5(kk) regarding potential connectivity to the north of the Preserve



(CCCC)

again request that the County remove the majority of trails in the northern area (Hagey/Wu parcels), particularly those that would promote an unauthorized “connection” to the SPP wildlife tunnel/undercrossing and the trail connection to (and staging area at) the SPP-SR 67 intersection.

Thank you for considering our continuing concerns. If you have any questions about this letter or wish to contact me, please use the email address below.

Sincerely,



Pamela Heatherington, Coordinator
Wildlife and Habitat Conservation Coalition
contactecsd@gmail.com

- cc: Deborah Mosley, Chief of Resource Management, County of San Diego, Parks and Recreation
David De Vries, City Planner, City of Poway
Edmund Pert, Regional Manager, CDFW
Gail Sevens, Environmental Program Manager, CDFW
Scott Sobiech, Deputy Field Supervisor, Carlsbad and Palm Springs Offices
Karen Goebel, Assistant Field Supervisor, USFWS



Wildlife and Habitat Conservation Coalition

Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.

August 16, 2018

Deborah Mosley, Chief Resource Management Division
County of San Diego Department of Parks and Recreation
5500 Overland Ave, Suite 410
San Diego, CA 92123
[via email only](#)



Subject: Background Information and Environmental Groups' Recommendations for the Sycamore Canyon - Goodan Ranch Preserve Public Access Plan / Trails Discussion on July 24, 2018

Dear Ms. Mosley:

(cccc)

The Wildlife and Habitat Conservation Coalition (WHCC) comprises seventeen (17) conservation-based organizations in San Diego. Representatives of a subset of these organizations met with you and several other Department of Parks and Recreation staff on July 24, 2018, to discuss the Sycamore Canyon - Goodan Ranch Preserve Public Access Plan / Trails (PAP Trails). Since then, those representatives have shared their concerns about the PAP Trails with all of WHCC's member organizations.

We thank you and the other Parks and Recreation staff for meeting with us on July 24 and appreciate the opportunity to present our perspectives, reasoning, and recommendations regarding the planning for the future public access/use for Sycamore Canyon - Goodan Ranch Preserve (Preserve).

This letter summarizes important and relevant information contained in the following key documents that provide direction and guidance regarding activities in the Preserve, which is part of the County's Multiple Species Conservation Plan-South County Subarea: (a) County of San Diego documents that pertain to the County's MSCP Subarea Plan and the Preserve, (b) studies contained in the Conservation Biology Institute (CBI) and US Geological Survey (USGS) MSCP corridor/linkage reports, and informal data from the San Diego Tracking Team (SDTT) regarding specific animal use in/around the Preserve, and (c) the City of Poway Habitat Conservation Plan / Natural Community Conservation Plan (Poway HCP). Based on information in the cited sources and personal knowledge among individuals in our group of the Preserve and MSCP / Poway HCP commitments, this document also provides comments on and recommendations for the County's proposed trail segments for the Preserve's PAP, a part of the Preserve's Resource Management Plan whose update is underway. Based on clarifications and additional information County staff provided during that July 24 meeting, these comments and recommendations incorporate some revisions to our initial positions discussed during the meeting. The individuals in our group are former or current environmental advocates, conservation biologists, and preserve managers.

Key Planning/Permit, Management and Resource Documents

The primary documents that the environmental representatives rely on for evaluating the PAP/Trails proposal include:

- County's Guidelines for Determining the Significance of Biological Resources (Guidelines)
https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Biological_Guidelines.pdf



Response to Comment 5-cccc (cont.)

The documents referenced in this letter and the commenter's opinion that some proposed trail segments are "acceptable" are noted; no response is necessary.

Please refer to the response to comment 5(kk) regarding connectivity to the north of the Preserve and to MR-1 with regard to the process undertaken to identify trail alignments. This response pertains to concerns regarding previous trail segments 1 through 7, 26, 29, and 30.

Regarding previous trail segments 14 and 14a, (now Trail 15), potential future trail connections to off-site properties would only be constructed if legal access is provided to the off-site properties. If there is no legal access, these trails would not be authorized.

Regarding previous trail segments 15 through 19 (now Trails 16 through 20), those trail segments are identified as "Closed to be Revegetated."

Please refer to the responses to comments 5(o) and 5(v) regarding previous trail segments 21 and 21a (now Trail 22).

Regarding previous trail segment 22 (now Trail 23), that trail segment is identified as "Closed to be Revegetated."

Regarding previous trail segments 23, all trail segments outside of the Preserve (except for indication of the existing Stowe Trail) have been removed.

Please refer to the response to comment 5(o) regarding proposed mitigation.

In accordance with the commenter's request, the PAP clearly delineates trail segments and does not include trail segments outside of the Preserve, with the exception of the existing Stowe Trail.

Please refer to the response to comment 5(n) regarding unauthorized trails. The trail map that will be available to the public will not include trails that are closed.



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- County Biological Mitigation Ordinance (BMO)
<https://www.sandiegocounty.gov/content/sdc/pds/mscp/bmo.html>;
- County's 2013 RMP for the Preserve and resources reports (scroll to "Sycamore" at link)
<https://www.sandiegocounty.gov/content/sdc/parks/openspace/RMP.html#ElMonte>;
- Wu and Cielo resources reports;
- MSCP (CBI) Corridor Analysis <https://d2k78bk4kdhbpr.cloudfront.net/media/reports/files/Corridors2003.pdf>;
- MSCP (USGS) Corridor Analysis
https://sdmmp.com/upload/SDMMP_Repository/0/4pg3yx71zvrc06qb9snkth25fmjw8.pdf;
- San Diego Tracking Team (SDTT) data reports; and
- 1996 City of Poway HCP - <https://poway.org/323/Planning-Reference-Documents>.

Attachment 1 contains key excerpts or findings from the above listed documents. We include excerpts from the Poway HCP because they are relevant to the Scripps-Poway Parkway (SPP) wildlife connection to the Preserve. These excerpts pertain to compatible land uses in Cornerstone Lands, which have similar status in the Poway HCP to that of the Sycamore Canyon – Goodan Ranch Preserve in the County's MSCP Subarea Plan, and reflect that the SPP underpass is a wildlife tunnel, specifically a component of the mitigation for the SPP extension project (*i.e.*, extending the SPP to SR67). It is implicit in the Poway HCP that the wildlife tunnel was not designed or intended for human use/trails.

The SDTT (quarterly reports from about 2010-2017) found that a wide range of mammal species uses the SPP wildlife tunnel (transect 23) based on transect monitoring; these species include mule deer, coyote, bobcat, long-tailed weasel, gray fox, raccoon, spotted and striped skunks, ringtail, black-tailed jackrabbit, kangaroo and wood rats, and roadrunners. This wildlife tunnel, which was constructed specifically to provide safe movement between Poway and County/Sycamore Canyon-Goodan Ranch open space lands, is a critical link used extensively by native species as indicated by the SDTT data. In addition, taken together, the Poway HCP excerpts seem to preclude the City from creating a formal trail on its Cornerstone Lands to the SPP wildlife tunnel. Therefore, we believe that the County should not propose in the PAP trails in the northern section (Wu/Cielo properties) that encourage or promote any potential connection to the SPP wildlife tunnel.

Comments on and Recommendations for the PAP Trail Segments

Several versions of PAP trail maps are currently found on the County's website or have been provided in meetings; these comments and recommendations pertain to the maps found under the Sycamore Canyon / Goodan Ranch heading on the County's website at <http://www.sdparks.org/content/sdparks/en/AboutUs/Plans/PublicMeetings.html> and the October 31, 2017, map that the County emailed us with the e-file title, *24July2018 Draft PAP Map*. It is the latter we used to create the map in Attachment 2. Our comments and recommendations are based on the documents and information described previously; they combine permit compliance, planning guidance, professional recommendations, and on-the-ground personal reviews of the trail segments. The terms "acceptable" and "unacceptable" summarize our interpretation of how each trail segment meets or fails to meet the combined relevant guidance and information. We recognize that the legend indicates that some of the trail segments that we designate as "unacceptable" are proposed to be closed and restored. We commend the County for these proposed closures. We simply wish to provide our own comprehensive assessment of all the existing and proposed trails.

Trail segments 1-7 in the Northern Sycamore Addition / Wu properties are **unacceptable** because of their potentially significant impacts to core habitat, corridor/linkages, sensitive species, archaeological/cultural sites and soils/erosion. The Northern Sycamore Addition, Wu, Cielo, and nearby parcels comprise a substantial core area of habitat that support a large variety of MSCP species and other sensitive species. This habitat area is



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linked to the north by the SPP wildlife tunnel and to the east via SR-67 culverts, all of which are already constrained. The improvement and creation of trails in this area would increase human use, further constraining wildlife usage of and movement through these linkages; they would significantly increase the potential for illegal trail building to the SPP wildlife tunnel. In addition, increased human presence would render the substantial archaeological sites within this area more vulnerable to vandalism/destruction, given the high erosion potential of the soils and topography.

Trail segments **8-9** and realignments/reroutes appear to be **acceptable** to provide a northern connection from the Preserve's staging area on the west to the SR-67 access on the east of the Preserve. A single E-W trail (8) could be constructed to connect to existing Calle de Rob (9) and segment 31 to avoid, minimize, and fully mitigate significant impacts (in contrast to Trails 1-7 that cannot achieve less-than-significant impacts).

Trail segment **10** is an existing SDG&E utility service access. A connection (proposed Trail Segment 31) from trail segments 8-9 to Sycamore Park Road and access along/across SR-67 (and perhaps a designated culvert for multiple-users) would preclude the need for this segment.

Trails segments **11 and 11a** (Martha's Grove) and realignments would be improvements to the existing, authorized trails by reducing steep, eroding portions and reducing safety risks to users and are **acceptable**. This presumes that specific routing would avoid, minimize, and fully mitigate impacts to all sensitive resources.

Trail segment **12**, with realignments as justified, is **acceptable** and an essential part of the existing approved trail system.

Trail segments **13 and 13a** (Ridge Trail) and realignments would improve the existing approved trail system and are **acceptable**. The realignments would remove (and would have to restore) very steep sections that will make this trail segment safer and more accessible to users. There do not appear to be significant potential impacts, but this must be confirmed by site-specific evaluations.

Trail segments **14 and 14a** (South Ranch) and realignments are **unacceptable**. This currently unauthorized trail goes across to or terminates at the south in private properties, none of which have expressed interest in allowing formal/approved trails. This proposed trail segment is redundant with the Slaughterhouse Canyon-Santee/Fanita Ranch-Stowe Trail loop that is proposed. In addition, this segment is a significant intrusion into the largest block of core habitat within the Preserve and, if established as an authorized/maintained trail segment, would introduce direct and indirect impacts. These segments have 12 Species of Special Concern, including 5 MSCP covered species (e.g., Coastal California gnatcatcher).

Trail segments **15-19** are **unacceptable** because they are unauthorized and unnecessary, rely on access/use of private property, and fragment the largest block of core habitat.

Trail segments **20 and 20a** (Slaughterhouse Road/Canyon) and realignments are part of the existing and authorized trail system and are **acceptable**. They provide access to the southern part of the Preserve and will be an essential part of a loop to connect to the USMC's authorized Stowe Trail if the County and City of Santee and Fanita Ranch complete negotiations for this loop.

Trail segments **21 and 21a** (Airplane Trail) proposes the use of an illegally cut trail, as well as a new cut into pristine habitat and are **unacceptable**. This rewards illegal behavior, unnecessarily destroys habitat, and does not provide connections to any area not already accessible via other routes. Both segments are also **unacceptable** for many of the reasons in the comments for Trail segments 1-7: significant impacts to core habitat (fragmentation), corridor/linkages, sensitive species and species of special concern, including San Diego Thornmint. The soils/topography are very erodible and this area, with substantial grasslands, is known



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to be important for mule deer. Additionally, the southwest part of this segment has archaeological/cultural sites as documented in the 2013 RMP Management Directive ("Trails or facilities within Slaughterhouse Canyon at the eastern edge of the Preserve will be avoided in order to avoid increased public access at the potentially significant sites recorded there").

Trail segment 22 is an illegally cut trail and is not designed to acceptable trail standards and is unacceptable and unnecessary, particularly when trail segments 14/14a are not acceptable, as described above.

Trail segments 23 are unacceptable, except for the segment that would link Slaughterhouse Canyon to Stowe Trail (see comments for segments 20 and 20a). The Preserve already has four existing, authorized entrances and the proposed additional "trail connections" (SPP, SR-67, south of Ridge Trail) are unnecessary and would increase hard-to-control/patrol access to the Preserve.

Trail segment 24 is an existing, apparently authorized trail access point (as shown on the official Preserve map) to Slaughterhouse Road/Canyon Trail with no apparent significant resource conflicts; it is acceptable.

Trail segment 25 is an existing SDG&E utility service access (acceptable).

Trail segment 26 is within the Northern Sycamore Addition / Wu / Cielo core area and, as with Trail segments 1-7, is unacceptable for the same reasons.

Trail segment 27 is part of the Preserve's operations/maintenance roads access (acceptable).

Trail segment 28 is an improved connection to Trail segments 11/11a and, based on site-specific information, appears to appropriate and acceptable.

Trail segment 29 impacts core area and is unacceptable. This habitat area is linked to the east via SR-67 culvert, which is already constrained. The improvement and creation of trails in this area would increase human use, further constraining wildlife usage of and movement through the tunnel.

Trail segment 30 is within the Northern Sycamore Addition / Wu / Cielo core area and, as with Trail segments 1-7, is unacceptable for the same reasons.

Trail segment 31 would be a necessary eastern extension of Trail Segments 8 and 9 within the southern portion of the Northern Sycamore Addition / Wu / Cielo core area and is acceptable to provide the northern East-West connection.

Other Comments Relevant to Determining Trail Acceptability

1. Lost or fragmented biological resources within County Biological Core Resource Areas (BRCA's) cannot be replaced or mitigated elsewhere (per MSCP, RMP p. 85).
2. Remediation (restoration to natural conditions) of unauthorized trails created "pre-MSCP" (prior to 1998 when the Preserve was included into the County's Subarea Plan) may not be appropriate as mitigation for project impacts. We want to clarify comments made during the meeting pertaining to circumstances under which mitigation credit would not be acceptable for remediation of unauthorized trails. These circumstances include, but are not limited to:
 - a. when remediation entails only passive methods and no performance standards and monitoring;



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- b. when the remediation is funded by a source outside the County of San Diego (e.g., Transnet) that is intended to support habitat restoration;
 - c. when remediation is on segments of pre-1997 trails whose footprint has increased since 1997; and
 - d. when the remediation is on segments of trails illegally created "post-MSCP;" those trails must be restored to keep the County compliant with its MSCP commitments.
3. The RMP update must describe how trail segment remediation is being accounted for – either simply as restored habitat or for mitigation credit. The associated CEQA document must fully describe the future status of all trail segments, associated impacts, remediation efforts, and how/where mitigation is expected to occur. The RMP must also describe that basic elements of the remediation - methodology(ies), timing, monitoring, etc.
4. The PAP must present a map that clearly delineates all of the existing trail segments and identifies:
 - a. which of the existing trail segments are currently "officially" authorized;
 - b. which of the existing trail segments are illegal/unauthorized;
 - c. all new or re-aligned segments (i.e., where new segments will be constructed); and
 - d. where existing trail segments (whether currently authorized or unauthorized) will be closed and restored.

As discussed at the meeting, the County will show trail segments only on lands that it has authority over (e.g., exclude trail segments #23). We understand that the PAP/RMP will include discussions about the relationship of the Preserve trail network to the County's larger trail master plan, and to authorized trails on adjacent lands (e.g., Goodan Ranch and MCAS Miramar).

5. Any incorporation of unauthorized trails into the PAP trail system encourages unauthorized trail building.
6. Use "unauthorized" or "illegal" to refer to the existing trail segments that are not a part of the current official trail system.
7. The trail map available to the public on the County's website should NOT show the trails that are closed.

Thank you again for meeting with us. We look forward to further communications with the County regarding the PAP Trails. If you have any questions about our letter or wish to contact me, please use the email address below.

Sincerely,



Pamela Heatherington, Coordinator
Wildlife and Habitat Conservation Coalition
contactecosc@gmail.com

cc: Edmund Pert, Regional Manager, CDFW
Gail Sevens, Environmental Program Manager, CDFW
Mendel Stewart, Field Supervisor, USFWS
Karen Goebel, Assistant Field Supervisor, USFWS



ATTACHMENT 1

Key excerpts or findings from the documents listed on pages 1 and 2 of the letter.

Key criteria in the Guidelines for determining significance of project impacts follow.

Threatened/Endangered Species: The project would impact one or more individuals of a species listed as federally or state endangered or threatened.

The project would impact an on-site population of a County List A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern. Impacts to these species are considered significant; however, impacts of less than 5 percent of the individual plants or of the sensitive species' habitat on a project site may be considered less than significant if a biologically-based determination can be made that the project would not have a substantial adverse effect on the local long-term survival of that plant or animal taxon.

Core Habitat: The project would impact the viability of a core wildlife area, defined as a large block of habitat (typically 500 acres or more not limited to project boundaries, though smaller areas with particularly valuable resources may also be considered a core wildlife area) that supports a viable population of a sensitive wildlife species or supports multiple wildlife species. Alteration of any portion of a core habitat could only be considered less than significant if a biologically-based determination can be made that the project would not have a substantially adverse effect on the core area and the species it supports.

(CCCC) Movement and Corridors: The project would interfere substantially with the movement of a 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. The following information should be evaluated to provide evidence to support a determination of impact significance.

A. The project would impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.

B. The project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage. For example, if the project proposes roads that cross corridors, fencing that channels wildlife to underpasses located away from interchanges will be required to provide connectivity. Wildlife underpasses shall have dimensions (length, width, height) suitable for passage by the affected species based on a site-specific analysis of wildlife movement. 21 Another example is increased traffic on an existing road that would result in significant road-kill or interference with an existing wildlife corridor/linkage.

The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels likely to affect the behavior of the animals identified in a site specific analysis of wildlife movement.

The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.

Key criteria in the BMO pertaining to project impacts to BRCA's and corridors follow.

SEC. 86.505. PROJECT DESIGN CRITERIA.

Impacts to land determined to be a Biological Resource Core Area [as is the Preserve] shall be avoided to the maximum extent practicable by using the following design criteria:

Response to Comment 5-cccc (cont.)

This attachment contains excerpts or summaries of various reference documents. These documents are not specific to the proposed project or the associated environmental analysis. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



1. Project development shall be sited in areas which minimize impact to habitat;
2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance;
3. Notwithstanding the requirements of the Slope Encroachment Regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design which may encroach into steep slopes to avoid impacts to habitat;
4. The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations;
5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G of Document No. 0769999 (Preserve Design Criteria) on file with the Clerk of the Board) and Attachment H (of Document No. 0769999 (Design Criteria for Linkages and Corridors) on file with the Clerk of the Board).

Attachment G – Preserve Design Criteria (similar language is in Section 4.2.1 of the MSCP Subarea Plan - https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/SCMSCP/MSCP_County_Subarea_Plan.pdf)

Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan. Potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, nonnative predators, nonnative species, illumination, drain water (point source), urban runoff (non-point source), and noise. County staff shall determine specific measures necessary to contain impacts from a new development project, and thereby avoid, reduce or mitigate edge effects on the preserve to less than significant levels. [Note : there is no Chapter 6 in the Subarea Plan.]

Attachment H – Design Criteria for Linkages and Corridors [Note: Similar language is in Section 4.2.3 of the MSCP Subarea Plan. The Preserve is a BRCA, but it also supports portions of major wildlife movement corridors within larger key MSCP linkages. Omitted here are the criteria pertaining only to linkages.]

The following are the design criteria for projects to protect the biological values of corridors:

1. Existing movement corridors within linkages will be identified and maintained.
2. Corridors with good vegetative and/or topographic cover will be protected.
3. If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide corridors are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.
4. Visual continuity (*i.e.*, long lines-of-sight) will be provided within movement corridors. This makes it more likely that the animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.
5. Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.
6. Barriers, such as roads, will be minimized. Roads that cross corridors should have 10-foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.
7. Where possible at wildlife crossings, road bridges for the vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-sight to the other end will be provided; and, if necessary, low-level illumination will be installed in the tunnel.



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8. If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is under 1-2 miles.

Key points in the 2013 Resource Management Plan for the Preserve follow. [Note: Omitted is species-specific information. Several of the accounts of species present during 2008 / 2012 baseline inventory surveys cite habitat loss and habitat fragmentation as causes of decline in the species within San Diego County. These excerpts may not include all key pertinent points – ran out of time to fully review.]

One of the general management directives of the Framework Management Plan [2001] pertains to public access, trails and recreation and states that appropriate recreational activities shall be accommodated in concurrence with the goals of the MSCP and MSCP SAP, as follows [page 4]:

- a) Public access and passive recreation are permitted uses within specified areas of the preserve. Access points, new trails and facilities, and a public control plan will be included in the specific framework habitat management plans and the area-specific management directives.
- b) Riding and hiking trails will be allowed within the preserves to allow passive recreational opportunities for the public. Passive recreation includes hiking, scientific research, bird watching, and under specified conditions and locations identified in approved projects and or management plans, mountain biking, horseback riding, sailing, sun bathing, fishing, and swimming.

Equestrian, hiking, and bicycles may be allowed when in accordance with approved management plans and are consistent with the County of San Diego MSCP SAP. All recreational activities will be required to avoid impacts to narrow endemics or unique critical populations of specific species, unless the activities are in “take” authorized areas as identified or allowed under the MSCP.

The Preserve is a component of MSCP core areas that are critical to functional wildlife habitat and movement within the MSCP.

The Preserve is located within the Metro-Lakeside-Jamul Segment of the MSCP SAP and is located within an area of the Central Poway/San Vicente Reservoir/North Poway Core Biological Resource Area. page 9
Per the MSCP, BRCAs are defined as generally supporting a high concentration of sensitive biological resources, which, if lost or fragmented, could not be replaced or mitigated elsewhere. page 85
According to the MSCP Habitat Evaluation Model, the majority of the habitat within the Preserve is rated as very high to high value with some smaller disturbed areas rated as medium to low in value. page 85

The Preserve is generally surrounded by other PAMAs or undeveloped areas, thereby increasing the conservation values associated with the Preserve. The Preserve is situated such that it should be considered part of an important regional wildlife movement corridor that connects open space in the inland portions of San Diego County with the Cleveland National Forest, located east of the Preserve.

This corridor is somewhat fragmented given the development of the Ramona region to the north. Specifically, low-density residential development borders this corridor in some areas, which constricts wildlife movement. For example, the Sycamore North property is constricted to the west by residential and equestrian facilities and to the north by Scripps Poway Parkway. page 86

The general area functions to convey large and small mammals within and through the Preserve as evidenced through wildlife camera data, track and scat observations, and visual observations of mule deer, coyote, and a radio-collared bobcat. page 86



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In order to assure that the goal of the MSCP Preserve is attained and fulfilled, management objectives for the County of San Diego MSCP SAP are as follows:

1. To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MSCP Preserve.
2. To protect the existing and restored biological resources from disturbance-causing or incompatible activities within and adjacent to the MSCP Preserve while accommodating compatible public recreational uses.
3. To enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat. Page 112

Management Directive B.1 – Restore degraded habitats to protect and enhance populations of rare and sensitive species through stabilization of eroded lands and strategic revegetation (Priority 1) page 124

Management Directive B.3 – Manage and minimize the expansion of invasive, non-native flora within the Preserve (Priority 2)..... page 125

Public access into the Sycamore North property is anticipated in the future to meet recreational needs in accordance with the County of San Diego Community Trails Master Plan (County of San Diego 2009a). However, access will balance human access with wildlife habitat and movement needs. page 128

DPR does not currently propose to allow public access onto this [Sycamore South] property until trail connections can be made. page 128

Management Directive C.2 – Manage public access in sensitive biological and cultural resource areas within the Preserve (Priority 1)

Implementation Measure C.2.2: DPR will ensure that any new public-use trails are designed and constructed to avoid and/or minimize impacts to sensitive biological and cultural resource areas (see implementation measure C.4.2). page 129

Management Directive C.3 – Analyze any future proposed public access such that recreational use of the Preserve is consistent with the protection and enhancement of biological and cultural resources (Priority 2)

Implementation Measure C.3.1: If, in the future, DPR proposes public access for the Sycamore South and Sycamore North properties, DPR will ensure that any proposed trail system is compatible with the MSCP SAP objectives and the County-approved Community Trails Master Plan (County of San Diego 2009a). page 130 (emphasis added – see two of the objectives below)

5.5 Cultural Resources Element (E) - The goal of this section of the RMP is long-term preservation, public interpretation of the cultural resources, and interaction with the Native American tribes in whose

traditional tribal territory this Preserve exists.

Management Directive E.2 – Preserve and protect significant cultural resources to ensure that sites are available for appropriate uses by present and future generations (Priority 2)

Implementation Measure E.2.1 (western Airplane Ridge and Slaughterhouse Canyon example): Any future development of recreational activities within the Preserve will consider potential impacts to cultural resources resulting from public access and increased public use. Trails or facilities within Slaughterhouse Canyon at the eastern edge of the Preserve will be avoided in order to avoid increased public access at the potentially significant sites recorded there. Trail development and maintenance activities may impact any potential subsurface deposits, and the increase in traffic and accessibility may create direct impacts through vandalism, looting or the inadvertent destruction of artifacts, features, and site integrity.



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County MSCP Subarea Plan

Two of the Subarea Plan's seven objectives are to:

Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

Conserve large interconnected blocks of habitat that contribute to the preservation of wide-ranging species such as mule deer, golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near golden eagle nesting sites. (page 1-11)

Key Findings in the Corridor/Linkage Reports

CBI: The Scripps-Poway Parkway underpass was designed to allow north-south movement of wildlife between open space in eastern Poway and in the vicinity of the Preserve. The SDTT has been surveying this underpass since May 1999 (Figure B-1). The survey results show that coyotes, bobcats, and mule deer used the underpass.

SR-67 separates Foster Canyon (San Vicente Highlands) and Iron Mountain open space from areas of eastern Poway and the Preserve. The SDTT monitored four culverts under SR-67 and detected cougar, coyotes, bobcats, and mule deer. Camera station results confirmed the use of the culverts by coyotes and bobcats, but not by mule deer.

USGS: Linkage 513 a. CA-5: Gooden Ranch/Sycamore Canyon b. CA-13: Mt. Woodson c. Identified in Ogden 1996 as "L-8: Central Poway). Linkage 513: functional but needs improvements -the purpose built wildlife tunnel existing between the Preserve and Mt. Woodson likely functions to allow most species to successfully move under Scripps-Poway Parkway. This tunnel is currently being evaluated for small terrestrial vertebrates, using remote trigger cameras. The goal of this study is to understand if the addition of internal structure can improve the use of the tunnel by small animals. The SPP tunnel could be improved with additional fencing to reduce wildlife access to the roadway above. To increase the function of this overall linkage, work should be done along Poway Road to the north, which currently has little to no wildlife safety structures.

SDTT (quarterly reports from about 2010-2017): A wide range of mammal species is found to use the Scripps Poway-Parkway (SPP) wildlife tunnel (transect 23) based on transect monitoring, including mule deer, coyote, bobcat, long-tailed weasel, gray fox, raccoon, spotted and striped skunks, ringtail, black-tailed jackrabbit, kangaroo and wood rats – and roadrunners. This wildlife tunnel, which was constructed specifically to provide safe movement between Poway and County/Sycamore Canyon-Goodan Ranch open space lands, is a critical link and is used extensively by native species. SR 67 Culverts (#42 – 2010 only) and the Preserve (# 33) transects reported use by most of the species reported for SPP.

Poway Habitat Conservation Plan – excerpts.

Publicly owned lands in the Mitigation Area that are chiefly devoted to protection of biological resources are termed "cornerstone lands." (page 3-7).

Approximately 2,578 acres of land within the Mitigation Area are designated as Open Space-Resource Management (OS-RM). These lands are publicly owned and most are designated as "cornerstone lands" of the subarea HCP. The OS-RM zone is intended for areas supporting valuable natural resources. These include mountainous areas prominent ridges, riparian areas, wildlife corridors, areas of high biological value, areas with geologic hazards, and areas with valuable historic and prehistoric resources. The OS-RM designations in the Mitigation Area will remain as preserved open space. (page 4-6)



6.2 LAND USE AND MANAGEMENT IN CORNERSTONE LANDS (p. 6-4)

Cornerstone lands are large areas of open space with significant protection for the biological resources they support. The majority of existing cornerstone lands are designated as OS RM in the Poway General Plan and Zoning Ordinance. Cornerstone lands outside of the OS RM zone also offer significant protection to biological resources via easements or other measures. The following sections summarize the land uses and management activities recommended on cornerstone lands to ensure achievement of the biological goals of the Poway Subarea HCP.

6.2.1 Compatible Land Uses

Land uses currently allowed by the Poway General Plan and Zoning Ordinance within OS RM areas include passive recreation and agriculture. Currently no agricultural uses occur within cornerstones. With the implementation of the Poway Subarea HCP, future agricultural development shall also be precluded from cornerstones to preserve existing biological habitats. Thus land uses within cornerstones shall mostly be limited to such passive recreational activities as hiking, nature study, and horseback riding on existing and planned regional trails (Figure 6.1). Some water projects and limited utility projects may be necessary within cornerstones subject to guidelines and restrictions of the Poway Subarea HCP. These projects will be evaluated on a case-by-case basis to ensure maximum compatibility with biological resource goals.

6.2.2.5 Recreation Public Access Management Issues (p. 6-27)

Passive recreational activities (e.g., hiking, bird watching) are anticipated within the cornerstone lands and are generally compatible with reserve biological goals. In general, passive activities pose a significant threat to biological resources only when the level of recreational use becomes too intense. Authorized or unauthorized active recreational activities such as picnicking, equestrian use, and mountain biking may also occur in or adjacent to the cornerstone lands. These activities are conditionally compatible with biological objectives. Most active recreational uses require some additional level of development such as access roads, parking lots, service facilities, maintenance buildings, and landscaping, and these facilities are generally more harmful to biological resources than the activities they support. Specific issues associated with recreational activities are outlined below.

Mountain Biking (p. 6-28)

Mountain bikes can affect water quality through erosion and sedimentation and results in habitat trampling and degradation. Mountain bike uses should be restricted to appropriate areas as discussed below.

Mountain Biking (p. 6-31)

- Limit mountain bike trails to areas not highly susceptible to erosion and out of wetlands and other sensitive areas.
- Construct trails wider than foot trails (minimum 6 feet) to prevent trail edge disturbance and on grades no greater than 25 percent.
- Rotate bike use by closing trails periodically to prevent trail degradation if a problem develops.
- Construct barriers to restrict access to sensitive areas.
- If use becomes so heavy that problems arise (e.g., trail degradation and erosion), develop an access control system and require permits.

6.4.3 Monitoring the Scripps Poway Parkway Extension (p. 6-66)

By creating a major thoroughfare across a wildlife movement corridor, and providing a specially designed undercrossing to accommodate wildlife movement, the Scripps Poway Parkway Extension project offers a unique



(CCCC)

experimental opportunity to conservation biology. The City of Poway will take advantage of this opportunity by studying changes over time in (1) roadkill frequency along the parkway and (2) use of the wildlife “tunnel.” These surveys will last for at least three years following opening of the parkway to traffic. In addition, the City will periodically monitor wildlife use of the water source provided at the mouth of the tunnel and bat use of specially designed bat roost structures inside the tunnel.

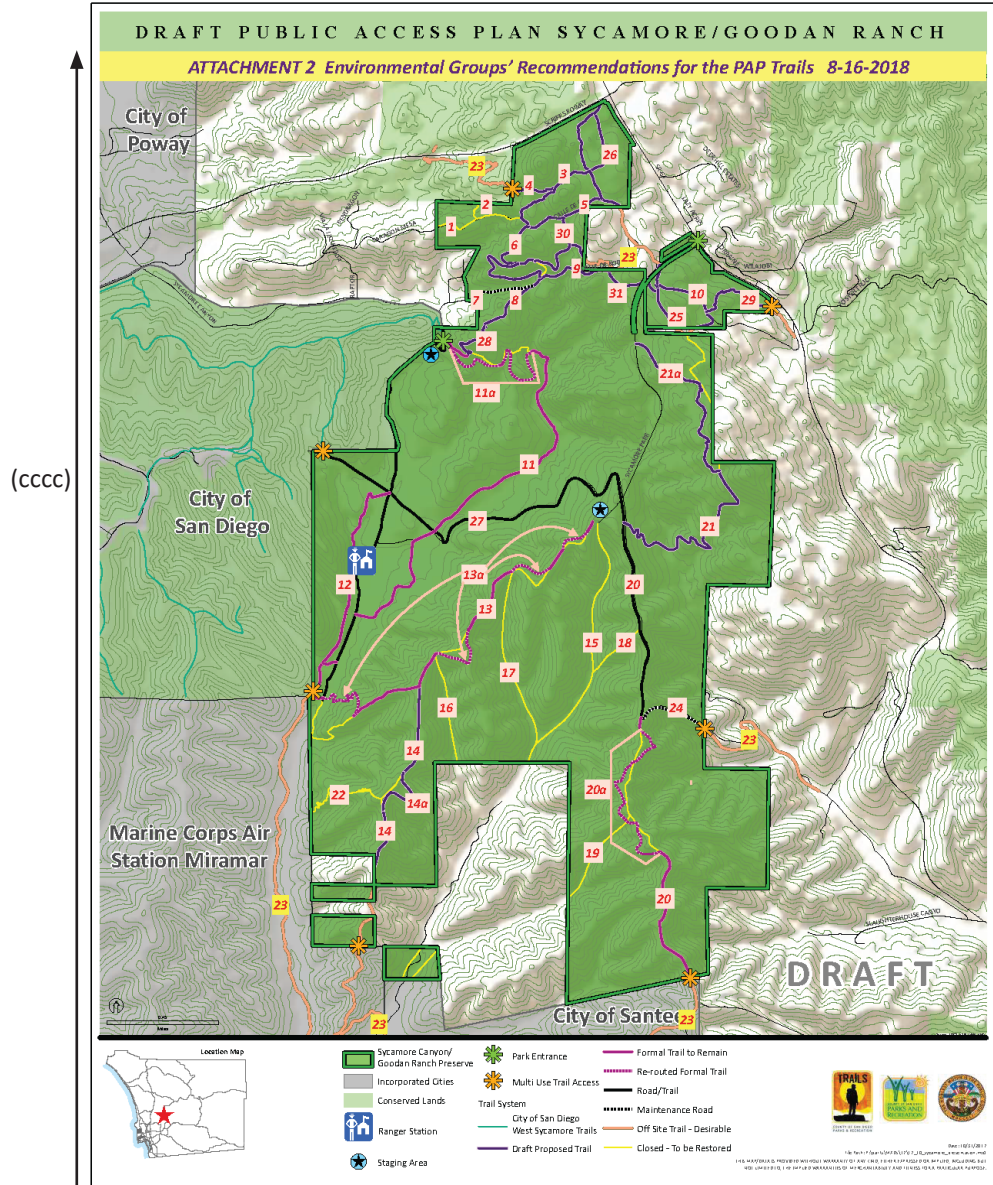
Roadkill incidence along the newly opened parkway is expected to be high in the months following its opening, particularly during the late summer fall dispersal period. Roadkill frequency may decline thereafter as animals living close to the parkway are killed or learn to avoid crossing the parkway (and perhaps to use the undercrossing). Monitors will patrol the shoulders of the parkway regularly for at least three years to identify and map roadkills. The suggested schedule would be relatively frequent patrols (e.g., monthly) during the first year and less frequent (e.g., quarterly) patrols during subsequent years. Roadkilled animals will be removed during each patrol to avoid double counting.

A similar schedule would be used in studying the use of the wildlife undercrossing. A combination of tracking media will be used in the tunnel to determine the frequency of animals entering and traversing the tunnel. Species will be identified by their tracks in raked dirt, sifted chalk dust, or other appropriate media placed at intervals along the length of the tunnel. Tracks would be identified and erased at each visit. Ideally, tracking should begin as soon as the tunnel is open and available for wildlife use without disturbance by construction or other activity. Intensive effort during the initial weeks (e.g., tracking every other night for the first several weeks) would best indicate the rate at which wildlife are learning to use the tunnel. Less frequent tracking thereafter (e.g., two consecutive nights of tracking every month) would document the baseline level of wildlife use after the initial period of learning.

A “guzzler” type water catchment is being added near the north entrance to the wildlife tunnel to attract wildlife to the tunnel entrance, acclimate them to its presence, and hopefully encourage use of the tunnel. Track media placed around the drinking entrance to the guzzler will allow identification of species using the water source. This study will be performed concomitantly with the tunnel tracking study.

Two types of man-made bat roosts are proposed for addition to the tunnel interior: open ended ceilings that create an attic space at the top of the tunnel arch, and vertically oriented “crevice boxes.” The first type is hoped to encourage use of the tunnel by free hanging bats (e.g., Townsend’s big-eared bat, *Plecotus townsendii*) that typically use interiors of caves, mines, or the attics of buildings for roosting. These species would hang onto the coarse concrete-fiber material used to line the tunnel interior. The ceilings would provide security for them by blocking them from human view and disturbance. The second type of bat house accommodates crevice-dwelling bats (e.g., California myotis, *Myotis californicus*), which typically wedge themselves in narrow crevices in rocks or between boards of buildings. Most man-made bat houses are discovered and occupied by bats within the first year or two of availability, provided the houses are properly constructed and placed (Tuttle and Hensley 1993). Periodic checks of both types of roost houses can easily be made with a flashlight and ladder. The City of Poway will encourage voluntary studies of the bat roosts by local bat experts (e.g., Karen Pluff of California Department of Parks and Recreation).





Letter 6. Basil Aruin

From: [Basil Aruin](#)
Sent: Monday, July 24, 2023 1:54 PM
To: CEQA, CountyParks
Subject: [External] Comment on Sycamore Canyon/Goodan Ranch Public Access Plan

Hello,

I would like to comment in support of the proposed plan at sycamore canyon/goodan ranch. I am heartened to see new trails proposed with sustainable/maintainable layouts with minimal closures.

(a)

I live in Ramona and enjoy having these trails close by, and am looking forward to the proposed improvements and the maintaining/improving of the connections between goodan ranch and other trails in the area, as isolated islands of trails can only do so much.

Regards,
Basil Aruin

Response to Comment 6-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 7. Daniel Carr

From: [Daniel Carr](#)
Sent: Monday, July 24, 2023 3:12 PM
To: CEQA, CountyParks
Cc: Pacholski, Emily
Subject: [External] Support of Sycamore Canyon/Goodan Ranch Improved Access

Hello Emily and Team,

I'm contacting you to express my enthusiastic support of the Public Access Plan outlined in the draft of the [Sycamore Canyon/Goodan Ranch Resource Management Plan](#), specifically, the proposed public access outlined in Appendix N.

As a Poway resident and avid mountain biker and trail runner, I think that improved access and management of the trail systems in Sycamore and Goodan is a critical step forward in effectively managing our limited recreational outdoor spaces. Currently, the trails of Sycamore and Goodan have limited points of access, are challenging to connect with the broader local trail systems, and include many unofficial trails that need to be formalized in order to be managed and maintained effectively. In particular, the plan creates important opportunities to tie the trail network into the trans-country trail system, linking areas such as Penasquitos Canyon and providing a continuous corridor of outdoor recreational space and trails nearly all the way to the coast. Furthermore, formalization of unofficial trails will allow proper construction and maintenance, while also avoiding private property boundaries- all of which mitigates risk for the county.

Please support our vibrant outdoor enthusiast community and the continued efforts of organizations such as SDMBA, and approve the proposed public access plan for Sycamore Canyon and Goodan Ranch.

Thank You,
Dan Carr
586.292.6172

Response to Comment 7-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 8. Byron Chesebro

From: [Byron Chesebro](#)
Sent: Monday, July 24, 2023 2:44 PM
To: CEQA, CountyParks
Subject: [External] Additional mtn bike trails in Gooden Ranch

- (a) I am 69 years old, a San Diego native and avid mtn biker. Sycamore Canyon is a great place to ride mtn bikes and I am all in favor of any plan that will extend or improve the existing trail system.
- (b) I also think that these trails should be available to class one e mtn bikes, this makes those steep climbs accessible to even an OLD rider like me. Not all e bikes, just class one e bikes.....pedal assist to 20 mph with no throttle and limited power.
- You can reach me for further comment at 858 922-8220 cell.

Byron M Chesebro
Rancho Penasquitos

Response to Comment 8-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 8-b

This comment states that trails should be available to Class 1 e-bikes. Use of Class 1 and Class 2 e-bikes is currently allowed within the Preserve, consistent with DPR policy. This policy is reflective of DPR's commitment to balancing the needs of conservation with public access. As indicated in the brochure for the Preserve, the speed limit for all bicycles is 10 miles per hour. The ongoing use of e-bikes consistent with current policy has been identified in the proposed project's PAP to provide continued accessibility to the Preserve by the public. No changes to the IS/MND are warranted.



Letter 9. Daniel Fellenbaum

From: fellenbaum.daniel@gmail.com
Sent: Monday, July 24, 2023 1:19 PM
To: CEQA, CountyParks
Subject: [External] Sycamore/Goodan Ranch Comment

(a)

Good Afternoon,

I'd like to submit a comment in support of the Public Access Plan. This region is and will continue to be a great outdoor resource for locals, and travelers, to enjoy the region.

I believe the plan should implement new multi-use singletrack trails for all users along with formalizing existing trails into the network with proper signage and maintenance by volunteers.

Thank you for all your hard work!

Dan Fellenbaum
(619) 632-8135

Response to Comment 9-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. As described in the proposed project's PAP, new multi-use trails and the formalization of some existing trails will be implemented throughout the Preserve. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 10. Anthony Harris

From: [Tony](#)
Sent: Monday, July 24, 2023 1:25 PM
To: CEQA, CountyParks
Subject: [External] 2023 Sycamore Canyon Goodan Ranch County Preserve Resource Management Plan

Hello,

I am a resident of San Diego, 92122. My family enjoys the multi-use trails throughout the county. Our whole family will go on various hikes around the county and appreciate the variety of what we have. My sons and I especially enjoy the trails open to mountain bikers. We ride multiple times per week. We are always looking for new trails and new places to hike and ride.

(a)

We are happy to see the plan will open new mountain bike trails and make improvements in connectivity of the various open-spaces. I support the efforts to implement sustainable public access and trail opportunities as there are some trails that are not easily accessed. Preservation of open space for mixed use can provide the necessary open space to maintain our region's biological diversity without closing the public's access to the natural places. These multi-role places provide opportunity for recreation as well as preservation and education.

I look forward to being able to have access more trails and experience a more connected system of trails through the implementation of this plan. This will provide another link and help in seeing the Trans-County trail completed. As residents of San Diego, we appreciate efforts to increase our access to the back-country and open spaces.

Thank you,

H Anthony Harris
San Diego, CA 92122
858-405-9987

Response to Comment 10-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 11. Bob Kain

From: Bob Kain <bob@mesarim.com>
Sent: Monday, July 24, 2023 3:36 PM
To: Pacholski, Emily
Subject: [External] Comments on Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan

To whom it may concern,

I am delighted to see a management plan that protects important wildlife, while also expanding access to such a both remote and accessible open space area. I have been a part of trail master plan efforts in the past, and have found that it is very possible to create a multi-use trail network that protects the rights of various trail users, while providing protection for natural resources and a great visitor educational experience. These types of plans increases public support for supporting and sustaining our precious open spaces.

I believe that great hiking, equestrian and biking trail systems provide connector trails for surrounding areas while also providing fun and sometimes appropriately challenging experiences for users. Most users enjoy trails that feel remote and somewhat technical. Tight twisty technical single track can offer these types of experiences, while also keeping user's speed in check, improving safety and enjoyment.

Thank your for your efforts on behalf of SD's open space and for taking the time to read comments as you finalize the plan.

Best regards,

Bob Kain

Response to Comment 11-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 12. Samer Khodor

From: [Samer Khodor](#)
Sent: Monday, July 24, 2023 12:56 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

(a)

Hello - I am writing to you in strong support of adding new and better trails to Sycamore Canyon/Goodan Ranch Preserve. As a San Diego resident and mountain biker, I enjoy mountain biking with my kids and wife on trails throughout San Diego County. We support this plan as it provides sustainable public access and trail opportunities for everyone to enjoy. It also provides unique mountain biking opportunities while maintaining multi-use trails. Lastly, it provides recreational areas and crucial trail connections with adjacent properties while conserving natural resources and educating visitors.

Thank you for your consideration -
Samer Khodor, MD
samerkhodor@gmail.com

Response to Comment 12-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 13. Danny Petkevich

From: [Danny Petkevich](#)
Sent: Monday, July 24, 2023 2:00 PM
To: CEQA, CountyParks
Subject: [External] Comments on Sycamore Canyon/Goodan Ranch Public Access Plan

To whom it may concern,

(a)

As 57 year old mountain biker, I love love riding in Sycamore canyon! Thank you for continued support of eMTBs. I could NOT do many of these trails without e-assist at my age any longer and probably couldn't enjoy the park. **Thank you for your support of accessibility for your grayng population in San Diego.**

I would also like to add the following comments:

- The plan develops sustainable public access and trail opportunities that provide an enjoyable experience for all
- The plan provides unique mountain biking opportunities while maintaining multi-use trails
- The plan provides recreational appeal while conserving natural resources and educating visitors
- The plan takes into account crucial trail connections on adjacent properties including connections for the Trans-County Trail (**i use this all the time**)

Thank you

.....dp

Danny Petkevich
13158 Sea Knoll Ct.
San Diego CA 92130

Response to Comment 13-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project, including the continued ability to use e-bikes in the Preserve, is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 14. Andy Robertson

From: [Andy Robertson](#)
Sent: Monday, July 24, 2023 6:35 PM
To: CEQA, CountyParks
Subject: [External] In Favor of Sycamore Canyon/Goodan Ranch Resource Management and Public Access Plans

(a)

As a Ramona resident I am a frequent user of Sycamore Canyon and Goodan Ranch. I often walk my dogs there, and I ride my mountain bike there every chance I get. This plan features necessary connections to connect the area to adjacent properties, such as the Trans-County Trail in Poway. We need sustainable public access and this plan provides and enhances it; it would increase my enjoyment of an area I already frequent while keeping it maintained for generations to come. Thank you and have a nice day.

Andy Robertson
Ramona Resident and San Diego County Native

Response to Comment 14-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 15. Paul Schroeder

From: [Paul James Schroeder](#)
Sent: Monday, July 24, 2023 1:25 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon Public Access Plan

(a) Hi,
I am writing to express my support for the Sycamore Canyon/Goodan Ranch public access plan. I live near this area and love riding it often. I think it would provide a wonderful upgrade to the connecting areas between Santee and Poway and generally increase the utility of the area for users. San Diego does a commendable job for maintaining open space for recreation for a large metropolis and I am glad to see plans to keep this going. The multi-use aspect of the plan is also crucial as we have such a varied use base and this is the best way to ensure all users are included. Please support the work at Sycamore Canyon going forward.
Thank you,
Paul Schroeder, Ph.D.

Response to Comment 15-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 16. Evan Sutton

From: [Evan Sutton](#)
Sent: Monday, July 24, 2023 8:57 PM
To: CEQA, CountyParks
Subject: [External] Sycamore/Goodan plan

Hello,

I am writing in support of the proposal to add additional trails to sycamore and goodan ranch.

I am both an avid mountain biker and hiker. While there are many excellent sanctioned hiking trails in our county, there are far too few sanctioned mountain bike trails. Even considering the variety of available hiking trails, additions are always welcome.

The proposed sycamore plan will improve access to our county's natural beauty for all users - and will provide a fantastic new resource to mountain bikers especially.

I urge you to adopt the plan and provide more opportunity for all of us to make the most of San Diego's wonderful natural areas.

Thank you,
Evan Sutton
3814 Mykonos Ln #2, 92130

Response to Comment 16-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)



Letter 17. Michael Taffe

From: [Michael Taffe](#)
Sent: Monday, July 24, 2023 2:38 PM
To: CEQA, CountyParks
Subject: [External] Support for the Sycamore Canyon / Goodan Ranch Public Access Plan.

To whom it may concern,

(a)

I am a resident of San Diego county and have been mountain biking in our open spaces since 1990. I am pleased to see such a well developed plan for expanding public access via multi use trails in the Sycamore Canyon space. I have reviewed the Draft plan and it appears to me to take adequate care for vegetation and natural life while expanding access and safety for a variety of trail users. I approve of efforts to improve or close informal trails as necessary and am particularly enthusiastic about trail connections and entrance points. Much of my enjoyment of our spaces and canyons involves linking shorter trails into longer loops and extended rides.

I urge the plan be adopted.

Mike Taffe

Response to Comment 17-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 18. Joel Baumgartner

From: [Baumgartner, Joel](#)
Sent: Tuesday, July 25, 2023 10:37 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon Plan comments

Hi,

(a)

I recently heard about the proposed plan to expand trails in the Sycamore Canyon/Goodan Ranch Preserve. I am a frequent user of the existing trails in this area as a mountain biker, and I am strongly in favor of the proposed plan for new trails. The plan seems sustainable and while selfishly provides additional mountain bike trails, it offers opportunities for other users as multi-use trails. It also appears to provide trail connections for the Trans-County Trail. New mountain bike trails are a rarity in San Diego county, and I strongly support the proposed new trails.

Joel Baumgartner
303.229.1343

Response to Comment 18-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 19. Mickey Booz

From: [Mickey Booz](#)
Sent: Tuesday, July 25, 2023 5:15 PM
To: CEQA, CountyParks
Subject: [External] In Support: Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Sycamore Canyon/Goodan Ranch Preserve

Dear County Parks CEQA Team et al,

I'm writing to express my **absolute support for the plan** developed by the County to sustain public access and trail opportunities for Goodan Ranch and The Sycamore Canyon areas. The unique mountain biking opportunities the plan provides in addition to the recreation appeal while conserving natural resources and educating visitors is a wonderful idea.

As an avid mountain biker and member/contributor to SDMBA and IMBA, I am wholeheartedly in support of improving trail connections on adjacent properties including connections for the Trans-County Trail system. Let me also express my extreme pleasure for your inclusion of e-bikers in your plan. I'm approaching 70 and this has given me the opportunity to connect with the environment, and my friends and see the beauty of our outdoors with a front-row seat.

As part of an informal social mountain biking group based out of Santee Lakes, my friends and I are overjoyed that the county has taken notice of this pristine area and is taking steps to maintain, develop and preserve its environmental beauty and value. If you need volunteers to help with the implementation of the plan, I'm raising my hand in support.

With great sincerity,
Mickey Booz, Encinitas, CA
#TheMTBRealtor



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Mick & Tina
BOOZ, POLANSKI
AND ASSOCIATES



CalRE#01216300
CalRE#01389333
CalRE#02144419

Response to Comment 19-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project, including the continued ability to use e-bikes in the Preserve, is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 20. Larry Fromm

From: [Larry Fromm](#)
Sent: Tuesday, July 25, 2023 4:53 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon / Goodan Ranch Resource Management Plan

(a)

I am writing to express my support for the County of San Diego's draft Public Access Plan for Sycamore Canyon / Goodan Ranch Preserve.

I am an avid mountain bike rider, and Sycamore Canyon / Goodan Ranch is one of the favorite riding locations for me and my friends. I applaud the plan's balance between public access and conservation requirements.

I appreciate the proposal to improve maintenance and access to existing trails, and to add new trails and reroute existing ones to improve the overall function of the trail system. I particularly like how the plan provides unique mountain bike opportunities while maintaining multi-use trails.

Regards,

Larry Fromm
12810 Via Del Toro, Poway CA 92064

Response to Comment 20-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 21. Dan Hakimzadeh

From: [Dan Hakimzadeh](#)
Sent: Tuesday, July 25, 2023 2:13 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon public access plan

Hi there,

(a)

I recently learned about the public access plan for Sycamore Canyon and wanted to send some comments in support. As both a homeowner in the county, and an avid mountain biker, I fully support public access to multi-use trails. Planned and maintained trails are good for everyone, they help with conservation of natural resources and wildlife, and are an asset to the community.

Thanks

--

Dan Hakimzadeh

Response to Comment 21-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 22. Jesse Meyers

From: [Jesse Meyers](#)
Sent: Tuesday, July 25, 2023 10:10 AM
To: CEQA, CountyParks
Cc: Pacholski, Emily
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update

(a)

Hi Emily,
I am writing in to support the Draft Mitigated Negative Declaration. As part of the local mountain bike community I'm excited to see the inclusion of multi-use and mountain bike friendly trails in a way that makes them sustainable.
Thanks,
Jesse Meyers

Shop Team Pro LLC
jesse@jessemeyers.com
www.shopteampro.com
w. [858.480.6549](tel:858.480.6549)
c. [818.921.5822](tel:818.921.5822)

Response to Comment 22-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 23. Jeff Ricards

From: [Jeff Ricards](#)
Sent: Tuesday, July 25, 2023 10:52 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update

Hi,

(a)

As a San Diego County resident who actively mountain bikes I support this Sycamore Canyon update. The county is only getting more crowded and built up so we need more public space to legally mountain bike. Also the current sycamore canyon trails are a lot of old fire roads which are not ideal for mountain biking so any new single track is very welcome.

Thank you.
Jeff

Response to Comment 23-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 24. Damon Smith

From: Damon Smith <dsmithi950@icloud.com>
Sent: Tuesday, July 25, 2023 7:32 AM
To: CEQA, CountyParks
Subject: [External] New Sycamore Canyon/Goodan Ranch Resource Management Plan

(a)

Hi, I'm writing in support of the Sycamore Canyon/Goodan Ranch Resource Management Plan. I've been mountain biking for over 20 years and have seen it get ever more popular. We need more trails as:

1. there are more mountain bikers than ever and 2. hikers and runners also love to enjoy new trails, and tend to use them almost as much as mountain bikers.

The great thing about new trails is that they are enjoyable by all, and are sustainable over generations. This plan also connects with adjacent trails, increasing the opportunity for recreation for all.

Damon Smith
San Diego

Sent from my iPad

Response to Comment 24-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 25. Scott Hansen

From: [Scott H](#)
Sent: Wednesday, July 26, 2023 11:06 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Comments

(a)

Hello,
Please note my comments of strong support for the PAP for Sycamore Canyon/Goodan Ranch Preserve. I strongly support the goal to develop sustainable public access opportunities that provide an enjoyable experience for hikers, bikers, and equestrians alike within the plan area. The equitable access for all to quality designed and maintained trails is sorely needed in San Diego County. Our community members increased engagement of outdoor recreation will lead to a healthier community while helping to educate the community on appropriate conservation and management of our open spaces.
Thank you for your efforts and the good work that is being done.

Respectfully,
Scott Hansen
3345 Seacrest Dr
Carlsbad CA 92008

Response to Comment 25-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 26. Justin Neuberg

From: [Justin Neuberg](#)
Sent: Wednesday, July 26, 2023 3:47 PM
To: CEQA, CountyParks
Subject: [External] Very excited about the Sycamore Canyon/Goodan Ranch Public Access Plan!

To Whom it may concern:

My family and I are very excited about the Sycamore Canyon/Goodan Ranch Public Access Plan. A few of the main reasons are below:

1. The plan takes into account crucial trail connections on adjacent properties, including connections for the Trans-County Trail.
2. The plan develops enjoyable and sustainable public access and trail opportunities for everyone.
3. The plan provides unique and exciting mountain biking opportunities while maintaining accessible multi-use trails.
4. The plan enhances the recreational appeal of the area while conserving natural resources and educating visitors about the importance of responsible recreation.

We sincerely look forward to enjoying this outdoor space more frequently!

Justin, Jamie, Geneva & Oliver Neuberg

Response to Comment 26-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 27. Donna Hein

From: [Donna Hein](#)
Sent: Thursday, July 27, 2023 6:53 PM
To: CEQA, CountyParks
Cc: [Donna Hein](#)
Subject: [External] Sycamore Canyon/Goodan Ranch RMP

DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan.

I support the RMP for the following reasons:

1. The plan develops sustainable public access and trail opportunities that provide an enjoyable experience for all.
2. The plan provides recreational appeal while conserving natural resources and educating visitors.
3. The plan takes into account crucial trail connections on adjacent properties including connections for the Trans-County Trail.

Sincerely,
Donna Hein
San Diego Equestrian Community Adm.
Membership 2800 Equestrians

Response to Comment 27-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 28. Tom Mauro

From: [Tom Mauro](#)
Sent: Thursday, July 27, 2023 9:41 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

To whom it may concern,

I've been mountain biking for years here in SD and one of my favorite places to ride is Sycamore Canyon. Its variety of single track, cross country, downhill trails, make it a unique riding experience. In addition, the variety of landscape, terrain and wildlife make it a great place to go for riding, running or walking. I've had a chance to review the plan and I support the plan for multiple reasons:

(a)

- The plan develops sustainable public access and trail opportunities that provide an enjoyable experience for all
- The plan provides unique mountain biking opportunities while maintaining multi-use trails
- The plan provides recreational appeal while conserving natural resources and educating visitors
- The plan takes into account crucial trail connections on adjacent properties including connections for the Trans-County Trail

I feel if the plan is executed you create a well connected, multiple use system for the community to enjoy.

Thanks for listening.

Tom Mauro

Sent from my iPhone

Response to Comment 28-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 29. Jimmy Piraino

From: [Jimmy Piraino](#)
Sent: Friday, July 28, 2023 9:08 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

Hello,

My name is Jimmy Piraino and I am a resident of Poway. My family and I have loved exploring and utilizing the Sycamore Canyon Goodan Ranch trails for years, and I want to express my support for the plan to develop sustainable public access. I have grown up mountain biking around San Diego county, and the plan for the canyon provides unique biking opportunities while maintaining the multi-use trails, which is key to public enjoyment.

I look forward to seeing how the plan progresses, and again express my full support for the development of the sustainable public access trails.

Thanks,

Jimmy Piraino

Response to Comment 29-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 30. Marshall Loewenstein

From: [Marshall](#)
Sent: Wednesday, August 2, 2023 10:05 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update - Support

Hello,

This note is in response to the public review of the Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update.

As a 20 year County resident and frequent visitor to Sycamore Canyon Preserve, I am supportive of this plan. I am an avid mountain biker and I ride in this area about twice per month.

(a) The planned trails will bring me to Poway more often for a variety of reasons, with commercial and non-commercial impacts.

I hope that this plan is presented to the County Board of Supervisors soon for approval. We are in desperate need of new singletrack mountain biking trails here in San Diego.

Thank you for accepting my input to support the plan for Sycamore Canyon/Goodan Ranch.

Sincerely,

Marshall Loewenstein
7640 Angeleno Rd
San Diego, CA 92126
858-245-7675

Response to Comment 30-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 31. Andrew Puricelli

From: [Andrew Puricelli](#)
Sent: Wednesday, August 2, 2023 5:13 PM
To: CEQA, CountyParks
Subject: [External] Comments on (IS/MND) for the Sycamore Canyon/Goodan Ranch Preserve

Hello,

I wanted to provide some comments in support of the IS/MND for the Sycamore Canyon/Goodan Ranch Preserve. My family and I have been utilizing the trails at Sycamore Canyon/Goodan Ranch for 20 plus years. We primarily go mountain biking (occasionally hiking) there and over the years have gone there less and less because of the limited trail network in the area (including the trails that were closed due to MCAS Miramar concerns). We very much support the IS/MND as it would develop a sustainable expanded trail system for the public to enjoy. We like the fact the plan would have some unique mountain bike trails but still have them set up for multi-use for everyone to enjoy. We also like the fact the plan would have an educational aspect for visitors. We live adjacent to Del Mar Mesa and regularly use the trails there and still find ourselves stopping and reading/re-reading educational signs. This plan presents a great opportunity to expand the enjoyment for all visitors visiting Sycamore Canyon/Goodman Ranch and will get more people excited about being outdoors.

Thanks,

Andrew Puricelli

Response to Comment 31-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 32. J. Rhode

From: jrhode1@san.rr.com
Sent: Wednesday, August 2, 2023 9:11 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Public Access Plan

Thank you for this opportunity to comment on the Public Access Plan for the Sycamore Canyon and Goodan Ranch open space in San Diego. I am a 32 year resident of San Diego County, an avid mountain biker, and lover of outdoor spaces. The ability to enjoy San Diego outdoors most every day of every year is one of the main reasons I moved to San Diego from the east coast many years ago. I am very excited to see this open space get the attention it deserves and I know MANY of my fellow San Diego Mountain Biking Association (SDMBA) members feel the same way.

I have been spending time in the canyon hiking and mountain biking for many years. I cherish the ability to enjoy this open space so close to my home in La Jolla. I have lived in La Jolla since 1990 and have seen San Diego grow at an astounding rate. I have seen the open space around Rancho Penasquitos preserve shrink over the years and noticed the severe overuse impacts that have occurred there as more people are shepherded by new housing developments into an ever-smaller open space. I support any efforts to ensure that the same fate does not await the Sycamore ranch / Goodan Ranch.

I believe that accessible urban trail systems are critical to the health and happiness of a community. The trails inspire healthy outdoor activities like hiking, biking, running, etc and they help foster a strong sense of community. Almost every interaction I have with other members of the San Diego community on these urban trail systems is positive. I cannot say the same thing about driving on the freeways or neighborhood streets.

While I have not read the plan in detail, I have reviewed the highlights and it's very exciting to see many of my concerns addressed in this plan.

It is important that the plan calls for sustainable public access and trail opportunities that provide an enjoyable experience for all trail users. This is key to maintaining support for the space within the community and fostering a sense of ownership amongst all trail users. As an avid mountain biker it is VERY exciting to see that the plan provides for unique mountain biking opportunities while, at the same time, maintaining multi-use trails. Mountain biking has exploded in popularity in recent years and I have seen many communities where well-regarded mountain bike trail networks create amazing local communities of bike riders and provide an attractive tourist attraction with travelling bikers looking for new places to ride. I have seen these canyons in every season and marvel at the representations of our local natural landscape that exist there. An engaging, well-maintained trail system can encourage locals and visitors alike to experience the natural resources we are so blessed to have here in San Diego.

I was especially excited to see that the plan recognizes the importance of access AND connections to adjacent open spaces. I have spent lots of time enjoying various segments of the Trans County

Response to Comment 32-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Trail and the inclusion of connectivity to this system shows great foresight.

- (a) ↑ Thank you again for your time and thank you for recognizing the need to protect and enrich our local San Diego open space resources. I am excited to see the future access, education and recreation opportunities that will be provided with focused management in the Sycamore Canyon / Goodan Ranch area.



Letter 33. Trent Selbrede

From: [Trent Selbrede](#)
Sent: Wednesday, August 2, 2023 5:07 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update - Support

Greetings,

This note is in response to the public review of the Sycamore Canyon/ Goodan Ranch Preserve Resource Management Plan Update.

As a native County resident and frequent visitor to Sycamore Canyon Preserve, I am supportive of this plan.

(a)

I am an avid hiker and mountain biker and I ride or hike in this area at least once per week.

In addition to supporting the plan, I will volunteer to help County staff and the San Diego Mountain Bike Association build and maintain these trails for all to enjoy. Many of these trails already exist!

I hope that this plan is presented to the County Board of Supervisors as soon as possible for approval. We are in desperate need of new singletrack trails in San Diego.

Thank you for accepting my comment to support the plan for Sycamore Canyon/Goodan Ranch.

Sincerely,

Trent Selbrede
12655 McFeron Rd
Poway, CA 92064
858-254-2252

Response to Comment 33-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 34. Tina Schmitz

From: [Honey Badger](#)
Sent: Thursday, August 3, 2023 10:24 AM
To: CEQA, CountyParks
Subject: [External] Support Public Access Plan Goodan Ranch & Sycamore Canyon

(a)

Deciding Officials,
I'd like to voice my support of the Public Access Plan for Goodan Ranch and Sycamore Canyon. I frequent these natural areas and many others in and around San Diego. No matter if I'm soloing the day or with friends, family, or visitors, I appreciate the ability to escape the busyness of the city and hike, run, and bike on nearby trails enjoying natural beauty and easy access. I'm always searching for legal ways to connect trails/ areas and find that element of the plan a bonus.

Please approve this plan!

Sincerely,
Tina Schmitz
3916 Carson St, San Diego, CA 92117

Response to Comment 34-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 35. Nathan Craig

From: Nathan Craig <nathan.livvy@gmail.com>
Sent: Friday, August 4, 2023 8:04 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch

Hi there,

(a) I hope you're doing well. I wanted to take a moment to express my excitement at the current prospect of San Diego making an effort to preserve the Goodan Ranch and Sycamore Canyon region and allow more intentional mountain biking access throughout. I was introduced to mountain biking (MTB) in high school and some of my best memories of my childhood were on some of the existing trails. I believe that having well placed, legal, safe, and FUN trails. I didn't ride for almost 20 years and just got back into riding for the last 3 years. I've lost 40lbs (which is a big deal as a father of 5) and MTB has changed my life. I have never been more interested in being a good steward of our natural preserves and land and I know the MTB community is passionate about maintenance and clean up in areas with trails (for beauty and for safety).

With all of the residential development taking place it is becoming harder and harder to find legal, safe, and enduring areas to enjoy such a positive activity.

I would be supremely in favor of more trail development in the Sycamore Canyon and Goodan Ranch areas.

Best regards,

Nathan C
619-933-1461

Response to Comment 35-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 36. Rolando Flores

From: [Rolando Flores](#)
Sent: Friday, August 4, 2023 10:14 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon / Goodan Ranch Preserve Resources Plan Update

(a)

Hello,
I would like to express my support to the Sycamore Canyon / Goodan Ranch Preserve Resource Management Plan.

My family and I hike and ride in this area at least 3-4 times per month and I think this plan will open much needed singletrack trails in San Diego. Many of these trails already exist.
I hope that this plan is presented to the County Board of Supervisors as soon as possible for approval.
I will volunteer to help maintain these trails, please keep me inform on how to participate.

Thank you

Sincerely
Rolando Flores
5130 Norris Rd
San Diego CA 92115
619-507-8262

Response to Comment 36-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 37. Ed Fowler

From: [Ed Fowler](#)
Sent: Sunday, August 6, 2023 12:24 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon / Goodman Ranch Public Access Plan

County Parks Dept. Representative:

I am writing in support of the proposed Sycamore Canyon / Goodman Ranch Public Access Plan. As a long time San Diego resident and avid mountain biker and hiker, I have enjoyed the trails at Sycamore Canyon / Goodman Ranch with family and friends for many years. That area has many unique features that make it special, and it's important for all of us to ensure that future San Diegans can enjoy the area as I have.

- (a) For long term success in preserving natural areas while providing public access in a populated metropolitan area, adequate planning is needed to provide sufficient trail options for users to spread out while also ensuring those trails are maintainable and keep minimal impact to wildlife. I understand that this plan was developed over many years of study and compromise by the various stakeholders.

I am asking that the plan be approved and that adequate funding be provided for its successful implementation.

Thank you for your consideration.

Best regards,
Ed Fowler
San Diego, CA 92129

Response to Comment 37-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 38. Shane Hamman

From: [Shane Hamman](#)
Sent: Sunday, August 6, 2023 1:36 PM
To: CEQA, CountyParks
Subject: [External] Draft Initial Study/Mitigated Negative Declaration (IS/MND)
for Sycamore Canyon/Goodan Ranch Preserve

Emily Pacholski, Project Manager,
County of San Diego, Department of Parks and Recreation,
5500 Overland Avenue, Suite 410,
San Diego, California 92123
CountyParksCEQA@sdcounty.ca.gov

Ms. Pacholski,

As an avid cyclist and trail rider, I'm thrilled to offer my support for the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update pursuant to the California Environmental Quality Act.

(a)

I appreciate the balance it brings between increasing (and therefore encouraging) outdoor recreational activity space and the conservation of our local natural resources. I am also happy to hear that current trails will be better maintained, existing informal trails will be added to the trail system, and new trails will be added, too.

Life and work keep us all busy, so the time we can find to spend exercising outside and enjoying recreational activities is precious. I greatly appreciate how much our County's Park and Recreation is striving to provide a better experience for these pursuits moving forward.

Sincerely,

Shane Hamman

M. Shane Hamman MD, FACMS, FAAD
UCSD Health Sciences Assistant Clinical Professor, Non-Salaried
shane.hamman@gmail.com
(619) 988-9906

Response to Comment 38-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 39. Maurice Pessot

From: [Maurice Pessot](#)
Sent: Sunday, August 6, 2023 12:28 PM
To: CEQA, CountyParks
Subject: [External] Sycamore canyon Public Access plan

County Parks:

(a)

I am a 30+ year resident of SD County and a frequent user of the existing trail system at Sycamore canyon. I have reviewed the PAP, and find it to strike a good balance between sustaining natural habitat, preserving cultural resources, and expanding the trail system to provide much needed recreational resources. Hikers, horseback riders, and mountain bikers all stand to benefit from implementation of the PMP. I look forward to the County implementing this plan.

Maurice Pessot
mpessot60@gmail.com

Response to Comment 39-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 40. Andrew Weil

From: andrew.weil@gmail.com
Sent: Monday, August 7, 2023 6:21 PM
To: CEQA, CountyParks
Subject: [External] Sycamore canyon proposed trails

Emily Pacholski,

I am a San Diego resident and engineer and long time user of San Diego and poway trails, both as a hiker as well as a mountain biker. The trails in this region are an incredible resource and I enjoy being out in nature. I really enjoy the sycamore canyon trails including Martha's Grove and the Rock and Roll trail. As part of my mountain biking experience I perform trail work every year as I know the trails don't maintain themselves. My work is limited to filling in ruts, cutting water breaks to improve drainage and sustainability, and trimming plants back from the trail's edge.

It would mean a lot to me to have rock and roll added to the official trail list of sycamore canyon. It would add some sorely needed intermediate level single track to the area and add more variety for a better experience.

Thanks for your consideration,

Andrew Weil
11472 Trailbrook Lane
San Diego CA 92128
214-783-4843

Response to Comment 40-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged, including formalizing the Rock and Roll Trail. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 41. Cynthia Planken

From: [Chi Outdoor Fitness Coach](#)
Sent: Tuesday, August 8, 2023 3:18 PM
To: CEQA, CountyParks
Cc: [San Diego Mountain Biking Association](#)
Subject: [External] Support for Public Access Plan at Sycamore Canyon / Goodan Ranch

To whom it may concern,
I am writing to express my enthusiastic support for the proposed Public Access Plan at Sycamore Canyon/Goodan Ranch plan. I believe that this plan encompasses essential elements that are vital for the well-being of our community and the conservation of our natural resources.

The points outlined in the plan showcase a thoughtful and comprehensive approach that addresses the needs and desires of various stakeholders while preserving the environment. The fact that the plan is designed to provide an enjoyable experience for all users is particularly commendable. Creating an inclusive space where people can engage in outdoor activities that promote health and wellness is a noble endeavor.

One of the highlights of the plan is its commitment to maintaining multi-use trails while also offering unique mountain biking opportunities. Striking a balance between different user groups is crucial for fostering a harmonious outdoor experience. This approach ensures that both mountain biking enthusiasts and those who prefer other recreational activities can coexist and enjoy the benefits of this public land.

Furthermore, I appreciate the plan's dedication to conserving natural resources. As we strive to provide recreational appeal, it is equally essential to be responsible stewards of our environment. Preserving the natural beauty of the land and educating visitors about its significance contribute to the overall sustainability of the area. This educational aspect not only enriches the experience of visitors but also promotes a culture of environmental consciousness.

I also want to emphasize my support for the plan's consideration of crucial trail connections on adjacent properties, especially those related to the Trans-County Trail. Connecting trails across different areas enhances the overall accessibility and connectivity of the trail network, making it easier for people to explore and appreciate the region's beauty.

In conclusion, I wholeheartedly support the proposed plan for sustainable public access and trail opportunities. The combination of offering enjoyable experiences for all users, maintaining multi-use trails, conserving natural resources, and considering important trail connections demonstrates a well-rounded approach that benefits our community and environment. I urge you to give your full consideration and endorsement to this plan, as it aligns with our shared values and aspirations.

Thank you for your time and dedication to our community's well-being. I look forward to

Response to Comment 41-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



(a) ↑ witnessing the positive impact of this plan on our public land.

Best regards,
Cynthia

--

Cynthia "Chi" Planken
CEO/Owner
[Outdoor Fitness Coach](#)
760-583-2170



Letter 42. John Holloway

From: [John Holloway](#)
Sent: Wednesday, August 9, 2023 7:52 AM
To: CEQA, CountyParks
Subject: [External] DRAFT Initial Study/MND Sycamore Canyon/Goodan Ranch
RMP comments

- (a) Thank you for preparing this plan and providing the opportunity to comment on it, especially as it addresses public access.
- (b) First and most importantly, new trail alignments (and existing management) need to address existing long-standing issues of unsustainable grades, resulting in continual erosion, degradation of user experience, and habitat impacts due to siltation into adjacent drainages.
- (c) Secondly, all trail alignments need to be part of loop configurations to reduce overall impacts by making "out-and-back" use unnecessary, which also improves user experience.
- (d) Third, any alignment on which a motor vehicle can be driven must not be defined as a trail. Such routes are rightly defined as roads which are inherently not conducive to a positive trail user experience. In other words, all trails need to be constructed and maintained as single track.
- (e) Finally, to reduce trail impacts, electric bike use should not be allowed, except for the disabled and those over 70 years old.

Response to Comment 42-a

The County appreciates the comment submitted on the Draft IS/MND. This is an introductory comment that is not related to the adequacy of the environmental document. No changes to the IS/MND are warranted based on this comment.

Response to Comment 42-b

The comment provides suggestions for key considerations to be addressed by new trails and existing trail management. The proposed project includes implementation of an updated RMP and PAP, which include measures to address trail grades, along with the associated potential for erosion and siltation. As summarized in PAP Table 12, steep portions of Trails 6, 12, 14, 21, and 22 would be re-routed to locations that would allow the trails to be less steep. The trail designs, as described in the PAP would follow the standards described in the County's Community Trails Management Plan and Preserve Trail Guidelines, which would reduce the effects of erosion and siltation. Section X of the Initial Study analyzes issues related to siltation and erosion and has determined that impacts would be less than significant. No changes to the IS/MND are warranted.

Response to Comment 42-c

The comment suggests that all trail alignments be part of loop configurations. Consistent with this comment, as shown in Figure 21 of the PAP, multiple out-and-back trail segments would be closed and loop configurations have been identified in the northern half of the Preserve. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Response to Comment 42-d

This comment states that locations where motor vehicles can be driven must not be defined as a trail. As shown in Figure 21 of the PAP, access and maintenance roads are identified separately from the multi-use trail network. These would be clearly identified within the Preserve to maintain the trail user experience. Trails would be intended to serve various functions and user groups. Therefore, consistent with the County's Community Trails Management Plan and Preserve Trail Guidelines, some trails would be six to eight feet wide, while others would be limited to two to four feet. Please also refer to MR-1 regarding the process undertaken to identify proposed trail alignments. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 42-e

DPR policy considers use of Class 1 and 2 e-bikes to be passive recreation and prohibits the use of Class 3 e-bikes on County trails. This policy is consistent with the State of California's definition of bicycles and is reflective of DPR's commitment to balancing the needs of conservation with public access. The ongoing use of e-bikes consistent with current policy has been identified in the proposed project's PAP to provide continued accessibility to the Preserve by the public. As Class 1 and 2 e-bikes are currently allowed, their use would not reflect a change from existing conditions that would result in additional environmental impacts. DPR will continue to enforce Preserve regulations and patrol unauthorized access. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.





Response to Comment 42-e (cont.)

The ongoing use of e-bikes consistent with current policy has been identified in the proposed project's PAP to provide continued accessibility to the Preserve by the public. As Class 1 and 2 e-bikes are currently allowed, their use would not reflect a change from existing conditions that would result in additional environmental impacts. DPR will continue to enforce Preserve regulations and patrol unauthorized access. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 43. Gerry Krippner

From: [Gerry Krippner](#)
Sent: Wednesday, August 16, 2023 6:55 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Access Plan

To whom it may concern,

Regarding the above mentioned plan, I believe the plan drives sustainable public access and trail opportunities which create an enjoyable experience for everyone. The plan provides for recreational opportunities while conserving the natural resources. It also creates educational opportunities for visitors. The plan takes into account critical trail connections on adjacent properties and maintains connection to the Trans-County Trail.

Thank you for your continued support in creating and maintaining trail access in San Diego County.

Gerry Krippner
Treasurer, San Diego Mountain Biking Association

Response to Comment 43-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 44. Daniel Pitard

From: [Daniel Pitard](#)
Sent: Thursday, August 17, 2023 10:54 AM
To: CEQA, CountyParks; Pacholski, Emily
Subject: [External] Sycamore Love and public comments

What does sycamore canyon mean to me?

EVERYTHING!

It's a perfect place for recreation and a small slice of heaven close to home.

There is so much to offer all San Diego's recreation needs right there tucked away in Santee. Sycamore canyon has some of the best mountain bike trail networks in San Diego. I've the last 30 plus years they have been built and maintained by locals yet people travel from all over the county to ride them.

(a)

The open space and trails are used by everyone and not just us mountain bikers. I often see people hiking and walking their dogs, people trail running or even kids playing in the fields.

San Diego has always struggled with having good trails that are legal and curated to be great MTB trails. We miss the mark with red tape and bureaucracy, limiting growth and protection.

San Diego has this huge opportunity and it's missed. We could easily be the adventure/MTB capital but we always get stuck in all the red tape. Places have sprung up all over the US and they have proven to be a big boom for the local economy and bring happiness to those riders and adventure seekers.

Do you see where I am going to go with this? Let's take this opportunity to expand and grow our community. We have a huge opportunity in front of us.

Sycamore brings me and many others a huge chunk of happiness. These trails provide so much fun and enjoyment and I beg and plead that we do everything we can do to keep, maintain and expand our sycamore experience.

With love and respect

Daniel Pitard

Response to Comment 44-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 45. Kevin Loomis

From: [Kevin Loomis](#)
Sent: Friday, August 18, 2023 11:18 AM
To: CEQA, CountyParks
Cc: [Susie Murphy](#); [Ben Stone \(eservesd@gmail.com\)](#); [Matt Bartelt](#); [Gerry Krippner \(gerrykrippner@gmail.com\)](#); [Scott Hansen](#); [Steve Pearlman](#)
Subject: [External] Draft Mitigated Negative Declaration - comments Goodan Ranch Public Access Plan

Hello,

I am a city of San Diego resident at 5995 Crow Court, SD 92120. I am also the Vice President of the San Diego Mountain Biking Association, I'm also on the Mission Trails Regional Park CAC and the Military Liaison with Mira Mar. In addition, through the San Diego Mountain Biking Association, I worked directly with the Military (Marines), the County, City of San Diego, City of Santee along with several agencies to help create the Stowe Pass – allowing trail users to connect Santee and Goodan Ranch via Stowe Canyon with a permit. Lastly, I've been instrumental in the ongoing land acquisition of the Stowe Parcel of Land from the Marines, with the intent to connect not only Santee but also Mission Trails to Goodan Ranch and the Trails County Trail System. To say I'm excited and highly supportive of this Public Access Plan is an understatement.

A few weeks ago, I vacationed with my family in Park City Utah. I wanted to feel, ride, walk, and experience their trail system which has been incredibly successful and spoken about nationwide. While I expected to be impressed, I left humbled. The benefits for public access are the answer to many issues we have today.

1. **Climate Change** – through an integrated system of trails, a large portion of people in Park City utilize Bikes vs Cars for their commute. Ebikes and bikes are seen everywhere, allowing all users to leave their cars at home. The Goodan Ranch network of trails will open many similar opportunities for people to avoid the commute to/from Santee/El Cajon – Poway. As in Park City, the more people who can access trails, the more they leave will leave their cars at home. Climate change is a primary issue for San Diego, and this trails access plan directly addresses this!
2. **Environment**. While well intentioned, some environmental restrictions have had horrendous impacts on the environment. As an example, closing off Tunnels in Penasquitos created a vacuum resulting in a massive migrant camp resulting in several tons of garbage and incredible environmental destruction. The same happened with the San Diego River – resulting in numerous homeless encampments, countless fires and extremely high levels of human feces, polluting beaches, the river and ocean. Land cannot truly be closed! When closed, the wrong people inhabit these areas. The sweet spot is adopting smart environmentally sound access, resulting in strong community stewardship. Strong community stewardship has resulted in ALL social trails in Mission Trails to be stopped. This concept has been proven throughout Park City, Crest Ridge and Goodan Ranch. When we encourage environmentally sound access, the environment benefits.

Response to Comment 45-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



3. Health of our children. Our children need to get off video games and go outside to exercise. We've seen many successful programs at Mission Trails introducing students to trails. Not only does exercise increase health, but they also develop a passion to enjoy and protect the environment. These are the future stewards of our trails!
4. Connections! In Park City, a development cannot be built unless it has access to their trail system. This is once again focused on Climate Change. I'd love to see the same for San Diego. Currently TWO large developments will benefit from interconnected trails via Goodan Ranch – Westin (which was sold as a trails community) and Fanita – the massive 10k plus multi-use development proposed in Santee. By interconnecting these trails to the Trans County Trail System – a trail user in Del Cerro at Mission Trails can literally connect all throughout San Diego. Connections not only unite various communities, but also directly address Climate Change.
5. Massive amount of local Santee users are coming! The Fanita Ranch development will soon bring over 10k people to your borders. The current trail system cannot handle this volume on existing trail. However, this plan will strategically disperse these users throughout the trail system.
6. Everyone wants to Hike Trails – trails need to heal! You only need to look at Iron Mountain and Cowles Mountain to see the environmentally negative impact of not having enough trails to enjoy. During the pandemic, people learned about and fell in love with trails! In several instances, the trails have been loved to death! This access plan is a smart, environmentally sound step towards environmentally dispersing demand. Diversification will allow high impact areas to heal – helping the environment.
7. Wellbeing! Trails promote community, happiness, and wellbeing. I often say I hit the trail dirty and come back clean. Yes, I'll be sweaty and have trail dirt on me, but the real dirt from life has been removed.

I highly support this plan and applaud all the hard work invested to get us to this point. I expect the environmental community will focus on keeping people out – which is sadly based on outdated and disproven science. Their failed model hurts the environment, does not address climate change, does not address the dramatic increase in trail usage and does not tackle childhood obesity. I strongly urge the passage of this well throughout and environmentally sound plan which not only benefits the community, but also directly addresses climate change and furthers the interconnections of trails, while protecting the environment. This is one of those rare win-win opportunities for everyone.



Kevin Loomis | President
Xyon Global <><
xyonglobal.com

The San Diego Mountain Biking Association
Vice President and Executive Committee

California Mountain Biking Alliance
Founder





Mission Trails Regional Park CAC
Multi Use Trails Rep

Marines
Community Liasion

Kolbe™ 9, 6, 3, 2

Direct: 619.838.4781

[What we do 😊](#)

[LinkedIn](#)

[Kevin's Calendar](#)



Letter 46. Stephen Pearlman

From: Pacholski, Emily
Sent: Friday, August 18, 2023 2:34 PM
To: CEQA, CountyParks
Subject: FW: [External] Support of Draft Mitigated Negative Declaration - Sycamore Canyon/Goodan Ranch County Preserve RMP Update

Emily

From: Steve Pearlman <pearlman.seaa@gmail.com>
Sent: Friday, August 18, 2023 2:27 PM
To: Pacholski, Emily <Emily.Pacholski1@sdcounty.ca.gov>
Subject: [External] Support of Draft Mitigated Negative Declaration - Sycamore Canyon/Goodan Ranch County Preserve RMP Update

18 August, 2023

County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, California 92123

Subject:
Support of Draft Mitigated Negative Declaration
Sycamore Canyon/Goodan Ranch County Preserve
Resource Management Plan Update

Atten: Emily Pacholski, Project Manager

(a)

Upon review of the referenced **2023 Sycamore Canyon Goodan Ranch County Preserve Resource Management Plan** update and associated **Draft Mitigated Negative Declaration**, I am writing to respectfully submit comments in SUPPORT of the proposed mitigated negative declaration as drafted and in SUPPORT of the plan update for Sycamore Canyon/Goodan Ranch County Preserve.

The plan update represents a reasonable balance of public use and biological/cultural resource management as informed by the supporting comprehensive CEQA Environmental Study.

The cultural heritage, biological diversity, and educational aspects of the preserve are important, however, these resources must be available through the Public Access Plan as proposed. Critically, the access to recreational opportunities offered via the trail network

Response to Comment 46-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



and the attendant physical and mental health benefits that arise from such access by hiking, mountain biking, and equestrian use is well considered. In particular, I support the proposed retention of existing trails, addition of new trails, and the formal adoption of identified informal trails that were not previously included, in addition to establishing the important connectors that are necessary.

As a resident who currently uses and plans to continue to enjoy the benefits of outdoor experiences offered by the trail network in the preserve, I am writing in full SUPPORT of the plan update and associated draft mitigated negative declaration.

Respectfully,

-Stephen Pearlman
County of San Diego Resident



Letter 47. Steven Cipriano

From: Steven Cipriano <cipriano.steven@gmail.com>
Sent: Saturday, August 19, 2023 12:14 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon Public Comments

Hello,

(a) My name is Steven Cipriano, I am a San Diego resident and avid cyclist. I wanted to share my thoughts about the Sycamore Canyon / Goodan Ranch Public Access Plan. I am highly in favor of moving forward with this plan. Particularly because it develops sustainable public access and trail opportunities that provide an enjoyable experience for anyone in the area. It keeps multi-use trails available, while creating a unique mountain biking opportunity. It has both recreational appeal, and conserves natural resources, and even provides opportunities for educating those who visit it. The plan would be instrumental in providing crucial trail connections on adjacent properties including connections for the Trans-County Trail, which has been a long-standing goal of cycling advocates in the County of San Diego.

Thank you for your time, and I hope this project proceeds.

-Steven Cipriano
10781 Cariuto Ct
San Diego, CA
92124

Response to Comment 47-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 48. Matthew Bartelt

From: [Matt Bartelt](#)
Sent: Sunday, August 20, 2023 2:08 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update

As a San Diego resident and a regular user of Sycamore/Goodan Ranch, I fully support the Resource management plan update.

- (a) The greatest threat to San Diego's open spaces is encroachment by development. I want to commend the visionary leaders who have taken the time to create and set aside areas to remain in a natural environment. That being said, I cannot deny that the very encroachment prevented is creating islands of open space. While public access is allowed, it will take a very well defined and comprehensive trail plan to protect the open spaces from over use. San Diego citizens continually seek outdoor recreation opportunities and without the defined trail systems, social or rogue trails will appear. All it takes is one user to forge an unauthorized path where others follow it over time. We have seen what happens in many areas that face dense population use.

Please help protect these gems by creating a network of trails that allows all multi-use visitors to explore Sycamore Canyon/Goodan Ranch in its entirety, allowing for appropriate traffic circulation, and thereby limiting damage to areas from social use.

Thank you for your time and I am looking forward to the implementation of the Resource Management Plan.

--
Matthew Bartelt
858 243-0047

Response to Comment 48-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment also indicates the importance of a well-defined trail plan. The PAP, RMP, and VMP contain management policies and goals to reduce the impact from use of the Preserve. These policies will be enforced by DPR to both prevent future creation of unauthorized trails and to ensure the revegetation of closed trails. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 49. Winston Carter

From: [Winston Carter](#)
Sent: Sunday, August 20, 2023 7:13 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Mtb Trails

To whom it may concern,

I understand there is a plan to build more multi use trails for all of the family to enjoy. I'm 51 years old and during the last 3 years I've recently picked up E-bikes and mtb biking has been a great way for my 9yr old daughter and myself to get outside and enjoy nature. This has brought out family together and helped keep the younger generation off of the electronic devices.

We are ery lucky to live in such an amazing place with wonderful weather, these trails allow us to easily get out and enjoy nature. Please make sure these trails are multi use including e-bikes, ebikes have opened up this fantastic activity to the general public.

Thanks
Winston Carter

Response to Comment 49-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project, including the continued ability to use e-bikes in the Preserve, is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 50. Dirk Copeland

From: [Dirk Copeland](#)
Sent: Sunday, August 20, 2023 5:23 PM
To: CEQA, CountyParks
Subject: [External] Thanks For Considering Sycamore Canyon Improvements

Hi County Parks,

(a)

Thank you so much for assisting in further trail development for the Sycamore Canyon/Goodan Ranch Preserve. This is an exciting opportunity to create additional multi-use trails for everyone to enjoy. I moved back to San Diego around 3 years ago and am very encouraged by many of the thoughtful networks that benefit hikers, cyclists and equestrian users. The proposed improvements to trail alignment and connections, while considering adjacent properties sounds like it will make Sycamore Canyon better than ever.

Many thanks for continuing to make San Diego an amazing experience for all outdoor enthusiasts.

Regards,
Dirk Copeland

Response to Comment 50-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 51. Pete Gonzalez

From: [Pete Gonzalez](#)
Sent: Sunday, August 20, 2023 4:59 PM
To: CEQA, CountyParks
Subject: [External] Sycamore canyon

(a)

To many trails have be demolished or closed off to Mt bikers in SD Co.
The different cities & county need to pull their resources with non-profit groups like SDMBA to preserve our current trails & develop new ones for future generations. These hiking and biking trails provide necessary recreational activities to our young people who will benefit greatly in the future for their children. Too much development has created an unbalanced formula with nature especially wild animals that thrive on these public nature areas. I am increasingly having to drive long distances just to enjoy public trails & enjoy natures wonders.
Pete Gonzalez

Sent from my iPhone

Response to Comment 51-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 52. John Gray

From: jcgray@san.rr.com
Sent: Sunday, August 20, 2023 12:04 PM
To: CEQA, CountyParks
Subject: [External] (IS/MND) for the Sycamore Canyon/Goodan Ranch Preserve

Regarding the Sycamore Canyon/Goodan Ranch Preserve

(a)

I am a long time resident of San Diego and an avid outdoorsman in our beautiful climate here. I love hiking and mountain biking the many trails throughout San Diego.

I appreciate, respect, and support conservation of our natural resources in a way that balances outdoor recreational opportunities. I support the Public Access Plan for the Sycamore Canyon/Goodan Ranch Preserve.

The plan is the best of both worlds - providing recreational appeal while conserving and respecting natural resources.

Sincerely,

John

John Gray
858.740.8017
4890 Renovo Way
San Diego, 92124

Response to Comment 52-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 53. James Kovaly

From: [James Kovaly](#)
Sent: Sunday, August 20, 2023 4:05 PM
To: CEQA, CountyParks
Cc: Pacholski, Emily
Subject: [External] Sycamore Canyon / Goodnan Ranch comments - former County Trail Mgr

Emily,
I am commenting on Appendix N regarding the 15 miles of trails (both existing and planned) dedicated to multi-use routes for hikers, mountain bikers, and horses at Sycamore Canyon. As a former County Trails Manager in Clear Creek County, Colorado having more than 20yrs experience with the public comment, planning, design and implementation phases on similar projects, I am familiar with some of the challenges you face. I refer to them as the "*Four P's - People, Parking, Poop and Politics*". I have also been involved in the ongoing trail improvements at Daley Ranch in Escondido.

I strongly agree with your plans for the retention and maintenance of existing trails, re-routing / improvements to existing trails, addition of new trails, and incorporating certain informal (social) trails into the formal trail system and shutting others down. I have found that when somewhat "beat-up" trail systems are "optimized" with a focus on sustainability using modern trail build and design methods that maintenance becomes much easier moving forward and users are very thankful for the improved and expanded recreational opportunities that develop.

I agree this plan provides for an improved multi-use trails experience for everyone with better public access in addition to the unique mountain biking opportunities. The plan provides recreational appeal while conserving natural resources and takes into account critical trail connections on adjacent properties including connections for the Trans-County Trail. Good luck with the project!

Thanks for the opportunity to comment, I can be reached via email or 303-845-0196 if I can be of further assistance.

James
jkovaly@yahoo.com
303-845-0196

"Leadership is getting someone to do what they don't want to do in order to achieve what they want to achieve" ~ Tom Landry

Response to Comment 53-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 54. Robert Leitner

From: [Robert Leitner](#)
Sent: Sunday, August 20, 2023 6:15 PM
To: CEQA, CountyParks
Subject: [External] Goodan Ranch Sycamore Canyon trails

I know you're busy and probably won't read all these letters that are sent in, so please expand the trails in Goodan Ranch Sycamore Canyon trails. San Diego has the weather and terrain to be a meca for mountain biking with a little investment. It also encourages people of all ages to get out and enjoy what this city has to offer.

Besides that, here's a couple other valuable points-

- (a)
- The plan develops sustainable public access and trail opportunities that provide an enjoyable experience for all
 - The plan provides unique mountain biking opportunities while maintaining multi-use trails
 - The plan provides recreational appeal while conserving natural resources and educating visitors
 - The plan takes into account crucial trail connections on adjacent properties including connections for the Trans-County Trail

Cheers,
Robert Leitner

Response to Comment 54-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 55. Darren Loher

From: [Darren](#)
Sent: Sunday, August 20, 2023 12:38 PM
To: CEQA, CountyParks
Subject: [External] Sycamore canyon plan

Hello,

I would like to voice my support for the sycamore canyon plan. I think the improvements will provide a good experience for people to appreciate the canyon area. Both for hikers and mountain biking. By providing better access, people will have more interest in preserving this area for recreation and other areas as well.

I think it's important to include multi-use trails to appeal to a wide range of outdoor enthusiasts. The plan thoughtfully conserves natural resources and educates visitors.

Thank you for considering my opinion.

Darren Loher
309 Calle De Sereno, Encinitas, CA 92024

Response to Comment 55-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 56. John Paterson

From: [John Paterson](#)
Sent: Sunday, August 20, 2023 3:13 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

- (a) | Hi,
I would like to provide some comments related to Sycamore Canyon/Goodan Ranch plan for the future. I have been visiting this area for over 15 years primarily mountain biking and occasionally hiking and probably visit 5-8 times per year.
- (b) | 1. Please respect the original structures and new publically funded buildings. When the fires destroyed the original Goodan Ranch house many of us were devastated. I remember thinking why don't the rangers practice fire safe distances from structures like the community? There was significant brush that was not pruned back from the historic buildings and the first large fire of course burned the buildings down. The caretakers need to maintain safe space that is significantly pruned back to protect the structures so they can be enjoyed for decades, not just until the next fire.
- (c) | 2. Please work with local conservation groups to maintain and build new multi-use trails. I would rather the county focus more on making this a fun space for local families to visit and hike and ride and less focus on making sure all non-native plants are exterminated.
- (d) | 3. Team with groups such as IMBA and SDMBAs to build, maintain, high quality trails.
4. Consider adjacent trails when building or upgrading trails to allow people to access multiple areas which also brings more quality people to Sycamore Canyon.
- (e) | Thanks for opening up for public opinion.
- Take care,
John Paterson
14750 Carmel Ridge Road,
San Diego, CA 92128

Response to Comment 56-a

The County appreciates the comment submitted on the Draft IS/MND. This is an introductory comment that is not related to the adequacy of the environmental document. No changes to the IS/MND are warranted.

Response to Comment 56-b

The commenter's concerns regarding maintenance of defensive space are acknowledged. The VMP that is a component of the proposed project would implement fire management directives to address fire prevention, suppression, and monitoring and rehabilitation. The Preserve would follow DPR policies during red flag warnings and would continue to follow its Wildfire Emergency Plan. The comment does not address the adequacy of the environmental analysis and no changes to the IS/MND are warranted.

Response to Comment 56-c

The commenter's suggestion regarding coordination with other organizations to build and maintain trails is acknowledged. This comment does not address the adequacy of the environmental analysis and no changes to the IS/MND are warranted.



Response to Comment 56-d

The comment suggests considering adjacent trails when building or upgrading trails. As shown in Figure 21 of the PAP, trails leading to off-site properties have been identified as potential future connections. Please also refer to MR-1 regarding the process undertaken to identify proposed trail alignments. This comment does not address the adequacy of the environmental analysis and no changes to the IS/MND are warranted.

Response to Comment 56-e

This is a concluding comment. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 57. Lou Pisacane

From: [Lou Piso](#)
Sent: Sunday, August 20, 2023 12:31 PM
To: Pacholski, Emily
Cc: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodman Ranch Assess plan comments

Good Morning Emily and the rest of the review team,

I'm writing to express my support for the recommended trail and access improvements for the Sycamore Canyon and Goodman Ranch area. As a long time San Diego County resident and frequent user of the trail network for mountain biking I was excited to see the draft of the plan. I believed for a long time that due to the number of outdoor users in the area more space needs to be preserved for open space that includes multi use trails to allow more people to enjoy the San Diego outdoor experience. The plan is especially important as Sycamore/Goodman ranch is a key connector trail system that allows you to link up with other trail networks in the area. I hope the plan is passed and you look to expand trail access for all users throughout the county.

Best Regards,
Lou Pisacane

Response to Comment 57-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 58. Craig Radke

From: [Craig Radke](#)
Sent: Sunday, August 20, 2023 7:44 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Resource Management Plan

Hello,

I am writing to encourage support the County of San Diego's [DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan](#). I think that this plan does more than enough to accommodate access to trails for multiple users but please do not develop more than this. We do not need to have this beautiful area overrun with people who do not respect it like we have at Los Penasquitos Canyon Preserve and Iron Mountain Trail so please do not go beyond these plans.

Thank you,
Craig Radke

Response to Comment 58-a

The County appreciates the comment submitted on the Draft IS/MND. The comment expresses support for the proposed project and that trails beyond those proposed not be developed. The PAP, RMP, and VMP contain management policies and goals to reduce the impact from use of the Preserve. These policies will be enforced by DPR to prevent future creation of unauthorized trails. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 59. Jeff Rucker

From: [Jeff Rucker](#)
Sent: Sunday, August 20, 2023 7:14 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon / Goodan Ranch Public Access Plan

Dear Sirs:

(a)

I am a member of SD MBA, and want to express my support for more managed mountain bike trails within San Diego. If there's any way to connect to other trails, and provide sustainable management of trails, that's always a good thing. The local MTB community is always helpful for labor in maintaining trails. I do support this new plan. I think more trails can find a good balance of public use, and open space management. It would also be good to someday work out a legal trail to Santee. Thank You!

Jeff Rucker
10260 Wateridge Circle, #220, 92121
858-205-9639

Response to Comment 59-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 60. Luke Towne

From: [Luke Towne](#)
Sent: Sunday, August 20, 2023 12:54 PM
To: CEQA, CountyParks
Subject: [External] sycamore canyon/Goodan Ranch

(a)

Dear members, my name is Luke Towne and I have been a resident of SDCounty my entire life except for my years at Cal Poly university. I have enjoyed mountain biking since its inception in the 80's and have ridden in many different places. It has always concerned me with how little legal riding trails are in San Diego. Mountain biking promotes mental and physical health, helps people appreciate the natural beauty of the county, and hopefully encourages preservation. I encourage you to create a plan that does the following:

- Provides mountain biking opportunities while maintaining multi-use trails
- Encourages recreation while conserving the natural resources.
- Includes trail connections to adjacent properties.

Thank you for your consideration.

Sincerely, Luke Towne

Response to Comment 60-a

The County appreciates the comment submitted on the Draft IS/MND, which expresses support for the provision of mountain biking opportunities. The proposed project includes a PAP that is intended to provide mountain biking opportunities within multi-use trails, encourage recreation and conservation of natural habitats, and provide trail connections where appropriate. The comment does not address the adequacy of the environmental analysis and no change to the IS/MND is warranted.



Letter 61. Randy Wilbur

From: [Randy Wilbur](#)
Sent: Sunday, August 20, 2023 12:44 PM
To: CEQA, CountyParks
Subject: [External] Supporting Sycamore Canyon/Goodan Ranch Public Access Plan

(a)

I would like to add my support to the sycamore canyon/Goodman ranch plan. It is badly needed and represents an amazing effort by many people. It provides additional recreational opportunities while protecting important natural assets. It is the best way to preserve the area, discourage irresponsible use and at the same time provide needed public access to a growing population of users, including mountain bikes, hikers, and other nature lovers. Please approve this plan!

- Randy Wilbur
San Diego native since 1953

Response to Comment 61-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 62. Chris Zervas

From: [C. Zervas](#)
Sent: Sunday, August 20, 2023 12:37 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve

(a)

Hello,
I am a resident of San Diego and I support SDMBA's efforts to add bike trails to mixed use trails at Sycamore Canyon. As a father, I love to go on mountain bike rides with my son and friends to enjoy being in nature. I have a bad knee, and the only way i can enjoy the outdoors is via biking. But we don't have enough off-road bike trails in San Diego. Good freeride bike trails motivates many people of all ages to get out and enjoy the outdoors in a challenging and fun way.
Thank you,
Chris Zervas

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

Response to Comment 62-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 63. Matt Brooks

From: [Matt Brooks](#)
Sent: Monday, August 21, 2023 8:25 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon / Goodan Ranch Trail Comments

(a)

Hello,
My name is Matt Brooks and I am writing to voice support for the proposed improved access (per the Public Access Plan Appendix N) to the Sycamore / Goodan area.
I live in Scripps Ranch and my family and friends frequently hike and mountain bike the existing trails. It is such a beautiful area and I think anything we can do to sustainably and responsibly improve/increase access is a good idea.
Thanks for your work in seeing this plan through!
Sincerely,
Matt Brooks

Response to Comment 63-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 64. Glenn Gallo

From: [Glen Gallo](#)
Sent: Monday, August 21, 2023 8:19 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon Goodan Ranch

Response to Comment 64-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)

I am a bicycle enthusiast and have lived in San Diego since the 1960s

I ride both Mountain and Road. I also love to hike our area.

I am proud how are City and County has embraced opening up trails and building bike lanes and the fantastic MUP concept implemented throughout San Diego both County and City.

We are unique with our weather and open space management and truly an example of how to embrace this so citizens can be steps away from nature within urban environments.

As a Child growing up in UC San Clemente Canyon was staple and gave me the love of our Mesas and being shaded under Sycamore trees

As a resident of Rancho Penasquitos I have enjoyed Black Mountain and the fantastic new trails over the last several years and the Magic of the Penasquitos preserve. You truly feel you are not in the City exploring the many trials

The 56 bike path is an example of the great MUP projects and a staple in my cycling.

Sycamore is a Jewel of an area and I am well pleased it is getting the attention it deserves and look forward to another project by our Parks and Recreation for the current residents and generations to come.

I am more than pleased that this access will provide what I was given as a youth. The love of the canyons here in San Diego. Creating a new generations of Stewards for our unique and special ecosystem.

We are truly fortunate to have this symbiotic relationship of preserving open space while still giving the public access to recreate.

Sincerely,

Glen Gallo



Letter 65. Ming Gao

From: [ming.gao](#)
Sent: Monday, August 21, 2023 1:40 PM
To: CEQA, CountyParks
Subject: [External] In support of the County of San Diego's DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan.

Hi, there,

This is Ming. I am living in San Diego north county.

And I am a mountain biker.

We really need more outdoor facilities and resources, such as trails, for healthy families and vibrant communities!

Thank you all for your multi-year effort to bring forth this "Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan"!

I am in support of this plan.

And kudos to all of you involved!

ming

Response to Comment 65-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 66. Seth Hanson

From: [Seth Hanson](#)
Sent: Monday, August 21, 2023 10:42 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon Comments: Rock n' Roll
Attachments: [Rock and Roll Exit Reroute.png](#)
[Rock and Roll Exit reroute walked.png](#)
[Top Of Rock and Roll.png](#)
[Rock n' Roll and game tunnel with north side trails.gpx](#)

I wanted to add some comments and history about one of my favorite mountain biking trails in all of San Diego that happens to be in and around Sycamore Canyon.

(a)

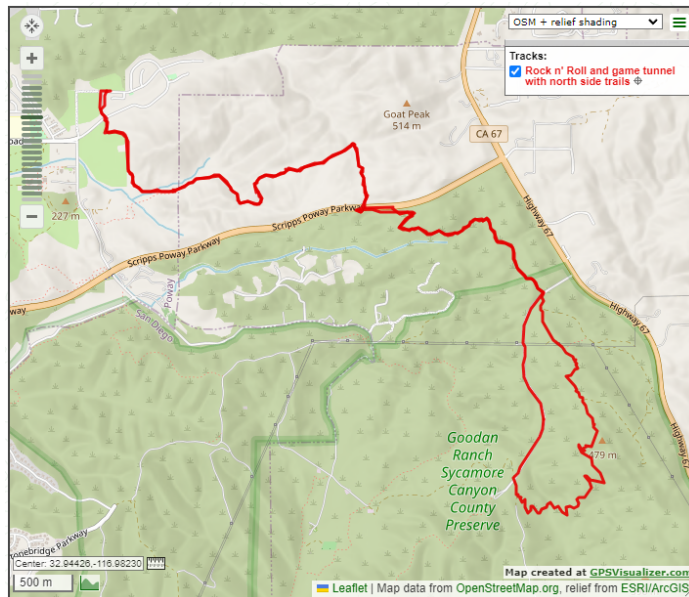
As a mountain biker, trail access is an important and difficult problem. Mountain bikers are a relatively new user group that suffer from a lack of traction with land managers and policy makers; we simply do not have the same established history as other trail user groups. The terrain and climate in the county have the potential to make San Diego a world class year round biking destination. There are many kinds of bikers that seek out different kinds of trail experiences and one thing we definitely lack here in San Diego are advanced legal trails. Advanced riders in the county have few legal alternatives.

The trail is on the very eastern edge of the park and has a lot of neat rock features and presents a challenging and fun downhill over a mile in length. The trail is colloquially known as "Rock n' Roll" because it is filled with a lot of rock features that you roll over. Rock n' Roll is the Easternmost section of the trail on the map below.

Response to Comment 66-a

The County appreciates the comment submitted on the Draft IS/MND. The comment provides recommendations regarding the Rock and Roll Trail (Trail 22). Trail 22 is identified in the Public Access Plan (PAP) as a "Type C" trail, which would enable retention of much of the trail's technicality. Please refer to MR-1 with regard to the process undertaken to identify proposed trail alignments. Similarly, the proposed project's PAP identifies South Raptor Loop Northwest (Trail 4) as a potential future trail connection that leads to the Scripps Poway Parkway tunnel. This trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Use of Trail 22 is not currently authorized and rangers are responsible for enforcing Preserve regulations, including with regard to unauthorized trail use. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



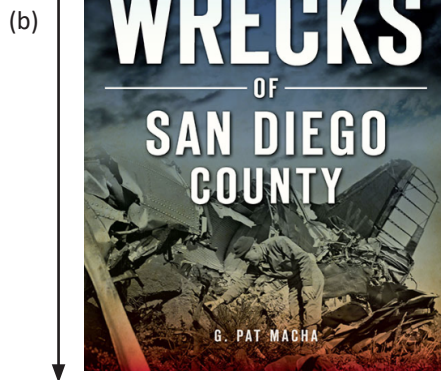


There are a few points I would like to convey:

- 1) Most importantly, maintain the difficulty and integrity of the current trail. This trail is somewhat unprecedented within San Diego and it would be a shame to change its unique nature or reduce the technicality.
- 2) To maintain maximum trail length and keep as many rock features as possible. When the trail becomes official, keep as much of the top of the trail as possible and get close to the corner of the neighboring property to pick up the existing trail there (picture: "Top of Rock and Roll.png").
- 3) The climb out to Slaughterhouse Canyon road is up a steep and grassy field that is overwhelmed by grass every spring and will encourage hikers to cut the switchbacks. I have investigated a reroute of the trail that would avoid having to switchback up through the grassy field and give the climb out from the bottom a much more interesting character.
- 4) There are some other great trails that are accessible through the game tunnel on Scripps Poway Parkway.
- 5) It is extremely unfortunate that the current ranger for Sycamore Canyon that has taken a confrontational approach to keeping mountain bikers off this trail and has been trying to obstruct the trail by digging up sections along with dangerous placement of rocks. Better outcomes could be achieved by working with the community.

(a) ↑
I have attached a few maps for your reference and GPS tracks.

Finally, I wanted to share some interesting facts about the jet engine that is located just off the trail. The plane was a McDonnell F3H-2 Demon. Although it appears to be 2 engines, the lower part is the rear afterburner and the part higher up the hill is the main engine.



Response to Comment 66-b

The comment provides a book excerpt on the history of an airplane crash within the Preserve. The comment is not related to the adequacy of the IS/MND and no change to the document is warranted.

(b)

Naval Academy graduate Lieutenant (jg) Thomas Allen Ryan was assigned to naval fighter squadron VF-121, based at NAS Miramar. His squadron flew the McDonnell F3H-2 Demon, then approaching the end of its operational service life.

On the night of May 15, 1961, Lieutenant (jg) Ryan was part of a two-aircraft practice intercept mission. As his flight was returning to Miramar, the pilots encountered a cloud layer. This was not unusual due to the proximity of the Pacific Ocean, which generates stratus clouds common in the late night and early morning hours. When the flight leader asked Lieutenant (jg) Ryan to flash his landing lights to acknowledge a radio message, the leader noted five flashes that indicated a possible failure of one of his wingman's radios. Moments later, the flight leader saw a flash as Lieutenant (jg) Ryan's Demon, Bu No 136973, crashed into mountainous terrain near the San Vicente Reservoir.

At the time of his death, Lieutenant (jg) Thomas A. Ryan was twenty-three years old. He left behind a wife and six-year-old son, Dennis Ryan. Even though the reason for his accident was not clearly defined, the accident report cited possible pilot disorientation, engine malfunction and radio problems.

On Veterans Day 2010, Dennis Richardson led a group of interested individuals, including the author, to the crash site of Lieutenant (jg) Ryan to honor his service and sacrifice. Flags of respect were placed amid the remaining wreckage. While most of the Demon's debris had been removed, a large part of the long-silent Allison J-71 turbojet engine remained almost intact above the point of impact. After several hours of surveying the crash site, the flags were retired and the long hike back to the highway was begun.

Website with pictures of much more of the debris:

<https://joeidoni.smugmug.com/Aircraft-Crash-Sites/San-Diego-F3H-2N-Demon-51009/i-rp99q2w>

Much Thanks,

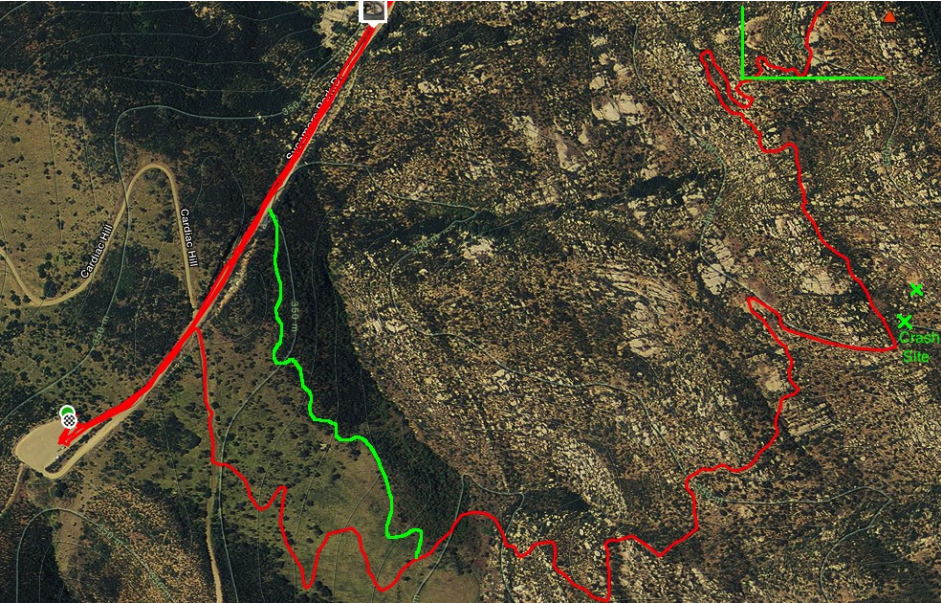
Seth Hanson

Show less









Letter 67. Yan Huang

From: [Yan "Ian" H](#)
Sent: Monday, August 21, 2023 7:21 PM
To: CEQA, CountyParks
Subject: [External] Support Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan

To Whom It May Concern,

(a) I'm writing to you to support the expansion plan of Sycamore Canyon/Goodan Ranch Preserve, which will benefit mountain bikers and hikers.

Thanks
Yan Huang

Response to Comment 67-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 68. George Hulley

From: [George Hulley](#)
Sent: Monday, August 21, 2023 7:57 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

Hi,

I am writing to express my support for the proposed Public Access Plan for the Sycamore Canyon/Goodan Ranch trail network.

I believe the proposed changes will be beneficial to all users who desire sustainable public access trail networks. In particular, the trails will be useful for hikers and mountain bikers. The plan also maintains sustainable natural resources present in the area, and will help with connections to trails on adjacent properties including the Trans-County Trail. I hope the proposed changes will pass.

Regards,

George Hulley

Response to Comment 68-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 69. Scott Irwin

From: [Scott Irwin](#)
Sent: Monday, August 21, 2023 9:41 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

SD County Staff,

I wanted to share my support for allowing public access to the Sycamore Canyon/Goodan Ranch area for mountain bike enthusiasts. As an avid mountain biker, I enjoy accessing this part of our county. Multi-use trails are a great way to allow all types of nature lovers access to public space. This area of our county is exceptionally beautiful. Everyone should be given opportunities to explore and appreciate the area. I believe the plan will support healthy physical activity while protecting our natural environment. This plan also takes into consideration the existing trail network, and allows riders to transfer from one set of trails to another.

I am proud we are beginning to embrace and support mountain bike riders. For many decades, official support for our sport was extremely limited. I learned this fact was unique to our county. While visiting my wife's parents in Colorado, I was impressed with their city and county run mountain bike trail networks. They understand mountain biking brings revenue to local businesses while protecting the priceless environment. This plan is an excellent step in this direction for our local area.

Thank you for your leadership in creating sustainable options for our citizens.

Scott Irwin
4533 Saratoga Ave.
San Diego, Ca. 92107

Response to Comment 69-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 70. Dan Jordan

From: [Dan Jordan](#)
Sent: Monday, August 21, 2023 3:22 PM
To: CEQA, CountyParks
Subject: [External] Support of proposed plan[SUSPECTED SPAM]

Hi,

My name is Dan Jordan and wish to provide my support to the proposed plan for developing sustainable public access to maintain and increase my trail riding experiences. This plan is good for all stakeholders and provides the opportunity for future sustainable improvements. I really like how all stakeholders have come together to develop a plan which provides recreational appeal while supporting the conservation of natural resources. To me this plan includes all the critical trail connectors for the Trans-County trails.

Please accept my support for this plan.

Best,
Dan

Response to Comment 70-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 71. Edward Kallal

From: [Edward Kallal](#)
Sent: Monday, August 21, 2023 7:43 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update comments

(a)

Hi, with the ongoing mental health and obesity struggles across our society, it is more important than every to provide plentiful, efficient access to healthy, engaging outdoor recreation. The plans buildup of mountain biking trails is a good step in that direction. Getting people outside and exercising will reduce the amount of time on social media and the negative effects associated with that.

The plan develops sustainable public access and trail opportunities that provide an enjoyable experience for all. It also provides unique mountain biking opportunities while maintaining multi-use trails and while conserving natural resources and educating visitors.

It is also great to see the plan taking into account crucial trail connections on adjacent properties including connections for the Trans-County Trail

Thanks

Ed Kallal
San Diego resident

Response to Comment 71-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 72. Mike Lowry

From: [Mike Lowry](#)
Sent: Monday, August 21, 2023 2:01 PM
To: CEQA, CountyParks
Subject: [External] Comments regarding the IS/MND for the Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update

(a)

I am a cyclist and hiker and volunteer trail worker at Sycamore Goodan Ranch Preserve which is one of my local trail systems. I had a chance to review the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Sycamore Canyon/Goodan Ranch Preserve Resource Management Plan Update and support the planned updates. Having officially sanctioned trails that connect to adjacent properties, including the potential connections to Fanita Ranch and the Trans County Trail are crucial for access and at the same time will reduce the cutting of unofficial trails in less than favorable habitats. Reroutes of existing trails to help with erosion problems make the trails more sustainable. For myself and my family we look forward to the park updates and thank you for the dedication to both conservation and access to local open spaces.

Respectfully,
Mike Lowry

Response to Comment 72-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 73. Brian Nixon

From: [Brian Nixon](#)
Sent: Monday, August 21, 2023 4:03 PM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan
Comment

Hello,

- (a) Thank you for the opportunity to comment on the Sycamore Canyon/Goodan Ranch Public Access Plan. In general the plan looks good and develops sustainable public access and trail opportunities. This will help improve the experience for those visiting the park.
- (b) A few specific comments:
Trail #4: "It is recommended that this trail remains closed until the City of Poway authorizes access onto their property and that existing barriers to deter use remain". Recommend removing physical barriers and install signage warning trail is not authorized within the City of Poway.
- Trail #14: Highly recommend several reroutes in steep areas
- Trail #21: Highly recommend several reroutes in steep areas
- (c) Trail #22: Reroutes should be limited to those only needed to avoid private property and the existing trail changed as little as possible. Installation of peeler core fencing along switchbacks in grassland slope at southern end to avoid off-trail traffic(hikers & bikers) should be as visibly unobtrusive as possible. I would also suggest mountain bike traffic be limited to clockwise(N to S) direction and hikers counter clockwise (S to N) direction. Horses should not be allowed.
- Parking #33: Recommend NOT allowing parking in this area. While no proposed disturbance, it would very likely lead to additional disturbance due to people parking off road. Already plenty of parking space in large lot at south end of 0(main access road).
- Thank You,
Brian Nixon
San Diego

Response to Comment 73-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's general support for the proposed project is acknowledged. This introductory comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 73-b

As noted by the commenter with regard to Trail 4, the PAP notes that this potential future trail connection would only occur if public trail use of the tunnel is authorized by the City of Poway. The comment, however, recommends removal of physical barriers. If there is no legal access leading off of the Preserve, Trail 4 would not be authorized. Until legal access is available, DPR would use signage and potentially barriers, as appropriate, to prohibit access. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

Response to Comment 73-c

The comment suggests several modifications to trail routes and proposed parking. Please refer to MR-1 regarding the process undertaken to identify proposed trail alignments. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 74. Robert Ponting

From: [Bob Ponting](#)
Sent: Monday, August 21, 2023 4:18 PM
To: CEQA, CountyParks
Subject: [External] Support for Draft Sycamore Canyon/Goodan Ranch Public Access Plan

To whom it may concern:

My name is Robert Ponting and I am writing to express my support for the Public Access Plan in the Draft Sycamore Canyon/Goodan Ranch Resource Management Plan that is being considered for adoption by San Diego County.

I am an avid mountain biker and hiker who lives in the Del Cerro area of San Diego, and I have been riding all of the trails that are currently available in the Sycamore Canyon/Goodan Ranch Preserve since 1998. I am particularly pleased that the proposed Public Access Plan would provide for building of new multi-use trails in the preserve and replace some of the current fire roads with single track trails that give trail users a more intimate hiking and riding experience. I am also glad to see that the plan provides for a much-needed connection to the Trans-County Trail. The Preserve is already connected to the West Sycamore portion of Mission Trails Regional Park and to the Stowe Trail, so it is a key component of several long trail rides for bikers, hikers and equestrians.

Sycamore Canyon/Goodan Ranch is a beautiful public property, and the draft Public Access Plan provides for sustainable recreation while protecting the flora and fauna in the reserve. I fully support the draft Resource Management Plan and the Public Access Plan.

Respectfully,

Robert Ponting
5762 Calvin Way
San Diego, CA 92120
858-210-5084

Response to Comment 74-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 75. Jacob Robertson

From: [Jacob Robertson](#)
Sent: Monday, August 21, 2023 4:16 PM
To: CEQA, CountyParks
Subject: [External] Requesting better access and trails in Sycamore Canyon/Goodan ranch

Dear County Parks,

I would like to contribute my voice in support of expanding the trail network and improving trail connectivity in the Sycamore Canyon / Goodan Ranch area. While this area already has some lovely trails, I have had multiple experiences of getting lost or running up against US military property boundaries while trying to bike through there. Other times I have had to make my way along fire roads made of baseball- to baby-head-sized rocks, which were barely passable by bike.

I appreciate having this open space for multi use recreation, and I have a feeling that more local residents would find things to appreciate about it with improvement to the trails, especially those that will make it easier to cross through the area by bike without trespassing on military trails.

Thank you,
Jacob

--

Jacob Robertson
PhD Student, NSF Graduate Research Fellow
Hwa Research Group
Division of Biological Sciences
University of California, San Diego

Office: Natural Sciences Building 2121
Lab: NSB 2106A
Cell: (814) 860-6262
<https://www.linkedin.com/in/robertsonjacob/>

Response to Comment 75-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 76. Gary Siebenlist

From: [Gary Siebenlist](#)
Sent: Monday, August 21, 2023 9:29 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Preserve - public access plan comments

(a)

Thank you for your significant efforts to improve the public land at Sycamore Canyon / Goodan Ranch. As an avid mountain biker, there is a pressing need for biking specific trail systems that represent the kind of riding that me and my group of friends will actually ride. Please do not create boring trails that are 'multi-use' for hiking, biking, horseback riding. These trails will not be utilized by anyone of us who only ride 'fun' trails. Having read the draft plan, and viewed the proposed trail maps, I am concerned that this public access plan will not represent the types of recreation that is sorely needed in San Diego county. My friends and I are aware that this land is for the use of all, not just mountain bikers, and we are also aware that building multi-use trails causes problems for all because hikers and bikers sharing the same trail is dangerous, prone to collision risks, and not fun for either the hikers or the bikers. A much better plan would be to build a shared climbing (up direction) trail since bikers and hikers are traveling at similar speeds on the uphill direction. For the down trails, building separate trails makes much more sense. Modern mountain bikes have gotten so much more capable and fun at handling big drops, rock gardens, jumps, and high speed berms. Other states (Oregon, Nevada, Arizona, Utah) have figured out how to do this and bring large groups of mountain bikers to enjoy these types of fun trails, and also manage to make it fun for hikers in the same trail network. This is done by directional trails, activity specific trails for when the terrain calls for it, and a heavy use of accurate and easy to understand signage, with the common difficulty ratings: Green, Blue, Black, Double Black. San Diego county is being left behind as a decent place to ride mountain bikes. We need to catch up and building "shared use" boring trails will not get it done.

Sincerely,
Gary Siebenlist

Response to Comment 76-a

The County appreciates the comment submitted on the Draft IS/MND. This comment suggests separation of trails for hikers and mountain bikers. Please refer to MR-1 regarding the process undertaken to identify proposed trail alignments. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 77. Evan Sollberger

From: [Evan S](#)
Sent: Monday, August 21, 2023 8:34 AM
To: CEQA, CountyParks
Subject: [External] Comments on Draft IS/MND for Sycamore Canyon - Goodan Ranch

Thanks for the opportunity comment on this plan.

The trail additions and changes will provide much improved access to Sycamore/Goodan Ranch and a better user experience for all trail users by increasing trail mileage and making existing trails more sustainable and more fun.

I especially like the additions in the north end of the park, in particular #3, 4, 5, 6, 7, 9, 26, 30, and 31. These short loops will add variety and help improve connectivity within the park. Even better if the Hanson Aggregate parcels or an easement through them can be acquired.

The addition of #22 Rock and Roll Trail is very important to mountain bikers. Thank you for including it. This trail fills a major need for technical mountain biking in the park. The reroute to start the trail on Sycamore Park Dr to avoid the private property is good. The powerlines above the existing route (#25) and this route's width do not provide a good nature experience. Please route the new trail to incorporate technical rock features as much as possible.

I don't have a strong preference for either #22a or #22b options, but being slightly longer and having fewer switchbacks, 22b is likely the better option. The existing trail there has many switchbacks, which are more difficult to maintain and prone to hikers shortcutting the trail. 22b would not have that issue since it mostly contours across the slope.

There are a number of places where I think the plan could use some improvements:

#4 – Northern Addition Northwest – this trail should remain open given it is a frequently used connector to access Poway Trails. Poway has not taken any action to indicate it intends to close the connecting trails on its side of Scripps Poway Pkwy. This is the best and most sustainable trail in the park.

#12 – Martha's Grove – the proposed re-route needs to be much longer than shown (likely 2-3 times longer), starting roughly where the middle "12" is on the map. It needs to replace the entire steep, eroded section all the way to the top of the subsequent short steep climb with less steep, more sustainable trail. Numerous attempts to fix the existing section have been made by installing large water bars and rock armoring. All of these attempts have failed. This section is simply too steep to be sustainable even with frequent maintenance.

#14 – Ridge Trail – I like the re-routes to bypass peaks on the ridgeline which will reduce grades. However, the trail needs a more extensive re-route where it drops from the ridgeline down

Response to Comment 77-a

The County appreciates the comment submitted on the Draft IS/MND and the commenter's support for certain elements of the proposed project is acknowledged. The comment also suggests several trail modifications. Please refer to MR-1 regarding the process undertaken to identify proposed trail alignments. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

(a)



(a)

toward the Stowe Trail in the valley bottom. This section is unsustainably steep with an average grade of 13%, resulting in an eroded trail bed that fills with loose cobbles. Please keep the trail to singletrack width. At 8-12ft wide this will be a road, not a trail.

#15 – Ridge Trail South – The south end of this segment should be extended to the MCAS property line in the plan as “Potential Future Trail Connection” in case there is an opportunity to acquire MCAS lands that include Stowe Trail and the south end of this ridge. As with the rest of Ridge Trail, re-routes to bypass peaks on the ridge should be incorporated into the proposed alignment to reduce trail grades.

There is a major need for an additional trail connection to the Fanita Ranch project. The only connection available to all trail users is #21 Slaughterhouse Canyon Trail. (Stowe Trail permits are not available to non-US Citizens or those who cannot pass a background check, which is a sizeable portion of San Diego's population.) Please keep the trail to singletrack width. At 8-12ft wide this will be a road, not a trail.

#21 – Slaughterhouse Canyon Trail – the description mentions “Existing to Remain (with Reroutes)” but no reroutes are shown on the map. As with #14/15, this trail is in need of reroutes to bypass steep sections of the existing fire road. These steep parts are plagued by loose cobbles which are miserable to navigate by foot or bicycle and present a fall hazard.

#27 – Cardiac Hill – can we please get a singletrack bypass for this trail???

#28a vs #28b – 28b is highly preferred because it starts near the high point on Martha's Grove Trail. This will reduce the overall grade of the trail to climb up to the Access Road. Trail grade is a major determining factor in sustainability. 28b also passes some interesting rock features.

#33 – Rock and Roll Trailhead parking. I don't see why this additional trailhead is needed at all. It would be better to avoid this additional disturbance and use any credits toward extra reroutes for #12 Martha's and #14 Ridge Trail. The existing staging area at the end of Sycamore Park Drive does not see a lot of use at present. More parking is not needed here.

Thank you for your consideration,

Evan Sollberger



Letter 78. Steven Splettssoesser

From: [Steve Splettssoesser](#)
Sent: Monday, August 21, 2023 7:26 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

(a)

This is a great opportunity for San Diego to be placed on the map for being a destination for mountain bike enthusiasts like myself. I have often traveled to many other destinations in search of riding experiences, the Sycamore Preserve developed trail system can help contribute to becoming one of those destinations that attract riders from afar. I encourage the pursuit of approval for this plan.

R,
Steve Splettssoesser

Sent from my iPad

Response to Comment 78-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 79. Ian Stenehjem

From: [Ian Stenehjem](#)
Sent: Thursday, August 17, 2023 6:25 PM
To: CEQA, CountyParks
Subject: [External] DRAFT Initial Study/Mitigated Negative Declaration the Sycamore Canyon/Goodan Ranch Resource Management Plan including the Public Access Plan.

To whom it may concern:

(a)

I support additional trails for multi use in the Sycamore Canyon/Goodan Ranch Area. The Public Access Plan Sycamore Canyon/Goodan Ranch Preserve will help achieve that goal. I regularly use the existing trails with friends and family for mountain biking and hiking, but more are needed. I believe the plan will help improve and increase sustainable public access for all San Diegans. This plan will provide unique mountain biking opportunities, and maintain multi-use trails. The additional appeal of added trails and trail connections like those to the Trans-County Trail and others will encourage more use and enhance opportunities to educate visitors about responsible outdoor recreation and conservation. Outdoor recreation and exercise is critical to our community's physical and mental health. I urge you to adopt this plan, and include access and additional trails for all users. Thank you for your time.

Ian Stenehjem
5481 Dorothy Drive
San Diego, CA

Response to Comment 79-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 80. Don Sutton

From: Don Sutton <dsonsut@gmail.com>
Sent: Monday, August 21, 2023 10:48 AM
To: CEQA, CountyParks
Cc: Susie Murphy
Subject: [External] Sycamore Canyon/Goodan Ranch Public Access Plan

Dear County rec people.

Thank you so much for putting together the access plan for the Sycamore Goodan ranch area. As a 40 year resident of San Diego county during which I have always ridden bicycles (mostly off-road) I am very excited about your current plans for the Sycamore Goodan ranch area. It is such a spectacular area and provides for some of the best riding in the county especially for gravel bikes on fireroad type surfaces. The amazing feature of the area is that it connects to so many other gravel riding areas allowing for riders to take on some great longer distance routes.

Im especially excited because your plan emphasizes connectivity to other surrounding trails and areas.

Thanks again,

Don Sutton

Response to Comment 80-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 81. Clark Weigand

From: [Clark Weigand](#)
Sent: Monday, August 21, 2023 7:40 PM
To: CEQA, CountyParks
Subject: [External] Sycamore canyon

(a) Hi,

I strongly support the initiative to expand sycamore canyon mountain bike trails.

Thanks,

Clark
--
Clark Weigand
clark.weigand@gmail.com
(509) 981-3939

Response to Comment 81-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.



Letter 82. Jerry Wolfe

From: [Jerry Wolfe](#)
Sent: Monday, August 21, 2023 10:56 AM
To: CEQA, CountyParks
Subject: [External] Sycamore Canyon MTB Trails

Hello,

Please consider improving trails and access for MTB use in Sycamore Canyon. Many residents ride and we need safe places to do that. Mixed use is right for these resources. MTB riders respect the land and traditionally help improve the trails. Connecting trails is important to give proper access to surrounding properties.

Thank you,

Jerry Wolfe

Response to Comment 82-a

The County appreciates the comment submitted on the Draft IS/MND and commenter's support for the proposed project is acknowledged. The comment is not related to the adequacy of the environmental document and no changes to the IS/MND are warranted.

