Addendum 2 to the Ramona Grasslands Preserve Project Mitigated Negative Declaration

SCH # 2011111054

Date: September 17, 2025

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Attachments

Attachment 1: Mitigated Negative Declaration for the Ramona Grasslands Preserve Project (SCH #2011111054). Adopted August 7, 2013.

Attachment 2: Addendum to the Mitigated Negative Declaration for the Ramona Grasslands Preserve Project. Approved May 10, 2018.

1.0 Introduction

1.1. Overview

This document has been prepared to serve as an Addendum to the previously adopted Mitigated Negative Declaration (MND) for the Ramona Grasslands Preserve Project (Approved Project). This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

This Addendum addresses the Revised Project, which incorporates a trail closure and reroute, not previously included in the Approved Project. Sections 2.0 and 3.0 of this Addendum discuss the physical environmental effects associated with the closure of a portion of the Old Survey Road 97 trail and trail reroute, which were not previously addressed in the MND.

The analysis will demonstrate that the proposed project changes have no new adverse impacts or increased severity of adverse impacts and provides evidence that the Addendum is the appropriate document.

Because the modifications made to the project do not raise new issues about the potential for effects on the environment, the County of San Diego (County) Department of Parks and Recreation (DPR) has determined that this project is adequately covered by this Addendum to the Mitigated Negative Declaration.

1.2. Background (Project History)

The MND for the Ramona Grasslands Preserve Project (SCH #2011111054) (Adopted MND) (Attachment 1) was approved by the San Diego County Board of Supervisors on August 7, 2013. The Approved Project included four components:

1) Ramona Grasslands Preserve Resource Management Plan (RMP);
2) Ramona Grasslands Preserve Vegetation Management Plan (VMP);
3) Establishment of a multi-use trail within the Preserve consistent with the Ramona Grasslands Preserve Public Access Plan (PAP); and
4) Construction of supporting infrastructure improvements

The Adopted MND identified significant impacts to biological and cultural resources and included mitigation measures that would reduce each of these impacts to below a level of significance. The draft MND was circulated for public review from November 17, 2011, through January 17, 2012, and 64 comment letters were received. One comment from the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) (herein referred to collectively as the Wildlife Agencies) requested complete removal of the north/south trail in the northwest portion of the Preserve (i.e.,

“Old Survey Road 97”) from the proposed trail system or only opening the trail for docent-led tours at appropriate times of the year, due to the possibility of impacting foraging habitat for golden eagles and/or impacting the success of an offsite golden eagle nest in Bandy Canyon.

Although the County CEQA analysis and findings did not support this assertion, in spirit of partnership and collaboration with the Wildlife Agencies, the County made the following change to the project description in the final MND: 1) Old Survey Road 97 was removed from the year-round planned trail system, with the exception that the trail could be opened for docent-led tours during the golden eagle non-breeding season (August 15 – November 15) . Also, additional changes were made to the project related to golden eagles, including the addition of eagle-specific avoidance and minimization measures. Subsequently, minor edits were made to the project impacts and proposed mitigation in response to changes made to the proposed trail system. These changes did not require recirculation of the draft MND because the greater project impacts and proposed project mitigation had already been analyzed, and the County of San Diego Board of Supervisors adopted the revised project description with the final MND.

1.2.1 Addendum 1

On May 10, 2018, County DPR approved an addendum to the Ramona Grasslands Preserve Project MND (herein after referred to as Addendum 1), (Attachment 2). Addendum 1 revised the project to allow hiking, biking and horseback riding on Old Survey Road 97 during the golden eagle non-breeding season (August 15 – November 15), on one additional day each week (2 days total, Saturday and Sunday) and removed the requirement that use of the trail be with a docent. As stated in Addendum 1, the change was implemented for two reasons:

1) Allow trail users sufficient opportunity to access regional trails from the Preserve (i.e., the Coast to Crest Trail in San Pasqual Valley to the north) pursuant to the deed restrictions and the conservation easements encumbering the property; and
2) To meet the intent of the trails system proposed in the original MND while still avoiding impacts to sensitive resources.

Measures to ensure that no impacts to golden eagles occurred were incorporated into the project and included:

- Seasonal closure of the trail;
- A permit system that required trail users to watch an educational training video before DPR issued a trail permit and allowed access to the trail;
- Limited trail users to 50 per day;

- Closed and passively restored the southern spur of Old Survey Road 97 nearest the eagle nest site;
- Discouraged off-trail activities that would bring trail users close to the off-site golden eagle nest;
- Added educational signage and increased ranger presence to ensure trail users were permitted and no more than 50 attended per day;
- Conducted educational outreach to neighboring landowners as well as hiking/biking/equestrian/ rock climbing communities;
- Continued maintenance to control the spread of invasive species within the Preserve; and
- Enhanced foraging habitat within the preserve.

1.2.2 Current Status

For the past eight seasons (2018-2025) DPR has implemented the permit-based seasonally restricted trail use for Old Survey Road 97. During this time, DPR has monitored the number of trail users, compliance with the permit system, and conducted patrolling and monitoring for unauthorized uses of the area. In addition, DPR has continued golden eagle monitoring of both the offsite nest for success and use of the Preserve by golden eagles and other raptors. The results of the ongoing Ramona Grasslands Raptor Surveys demonstrate a continued use of the Preserve by golden eagles in areas where human use occurs, including the northwestern portion of the Preserve during the fall season when the Old Survey Road 97 trail is open, and the preferential use of the Preserve's grassland vegetation communities for foraging (ESA 2024).

At the time the 2018 Addendum was approved, the California Department of Fish and Wildlife (CDFW) expressed their support for pursuing an alternate route to connect trails in the Preserve to San Pasqual Valley (Coast to Crest Trail) and offered to collaborate with DPR to explore a potential trail reroute that would move the trail alignment outside of the 4,000-foot (ft) avoidance area from golden eagle nests identified in the MSCP Plan (CDFW 2018).

Since 2023, DPR has worked collaboratively with the Wildlife Agencies to review potential options for the reroute of the trail that would provide further setback from the offsite golden eagle nest in Bandy Canyon and would allow a potential future connection to the regional Coast to Crest trail system in San Pasqual Valley. An assessment of biological, cultural, and aquatic resources was developed by DPR to support the planning process (DPR 2025). After significant study, and in consultation with the Wildlife Agencies, DPR selected an alignment that would reroute a section of the

existing trail to the least environmentally sensitive area practicable and provide further setback from the golden eagle nest.

The Revised Project would implement the rerouted trail alignment and close the section of the existing Old Survey Road 97 trail within the 4,000-ft nest avoidance area. Additionally, because the rerouted trail is outside of the 4,000-ft nest avoidance area required under the County's Multiple Species Conservation Program (MSCP) during times when golden eagle nests are active, the rerouted trail will be open year-round.

1.3. Basis for Decision to Prepare an Addendum

When a negative declaration has been adopted for a project, California Public Resources Code Section 21166 and CEQA Guidelines Section 15162 and 15164 set forth the criteria for determining whether a subsequent Environmental Impact Report (EIR), subsequent negative declaration, addendum, or no further documentation be prepared in support of further agency action on the project. Section 15162 of the CEQA Guidelines contains the following criteria for preparation of a subsequent negative declaration:

> **(a)** When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
>
> > **(1)** Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
> >
> > > **FINDING:** No substantial changes are proposed in the project which will require major revisions of the previously adopted MND due to the involvement of significant environmental effects or a substantial increase in the severity of the previously identified significant effects.
> >
> > **(2)** Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
> >
> > > **FINDING:** No substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions to the MND due to the involvement of new significant

environmental effects or a substantial increase in the severity of previously identified significant effects.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined will be substantially more severe than shown in the previous MND;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

FINDING: No new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined will be substantially more severe than shown in the previous MND;

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

1.4. Summary of Findings

As demonstrated in the environmental analysis in Section 3.0, the changes to the approved project analyzed in the Adopted MND would not result in new significant impacts or substantially increase the severity of significant impacts previously identified in the Adopted MND. Additionally, the mitigation measures set forth in the Adopted

MND are still applicable, and no new mitigation measures are required to mitigate the changes to the Approved Project. Therefore, County DPR, as the Lead Agency, has determined that, consistent with the CEQA Guidelines Sections 15162 and 15164, an Addendum to the MND is sufficient and appropriate. Public review of this Addendum is not required per the CEQA Guidelines Section 15164.

2.0 Project Description

2.1. Project Location

The Preserve is located within the western portion of the Valle de Pamo (or Santa Maria Valley), part of the historic Santa Maria Rancho, 6 miles east of Interstate 15, approximately 1.5 miles south of State Route 78, approximately 1.4 miles north of State Route 67, and approximately 2.0 miles west of downtown Ramona, California.

The Preserve's 3,867[1] acres are divided among four distinct pieces shown in Figure 1:

- The northeast (NE) portion is bounded to the south by the Ramona Airport, west by Ramona Municipal Water District (RMWD) land and rural residential development, north by rural residential development, and east by planned residential development and associated proposed open space.
- The southeast (SE) portion is bounded to the south primarily by rural residential development, west by Rangeland Road and the SW portion of the Preserve, north by RMWD land and the Ramona Airport, and east by undeveloped land.
- The southwest (SW) portion is bounded to the south by Highland Valley Road, west by rural residential development, northeast by RMWD land, and east by Rangeland Road.
- The northwest (NW) portion is bounded to the south by an unpaved road and RMWD land, and by rural residential development, agriculture, and open space along its other boundaries.

Since the adoption of the MND, County DPR has expanded the NW portion of the preserve through several acquisitions. These include acquisitions that occurred in 2019, 2020, and 2022.

The proposed modifications to the Project covered by this Addendum are within the NW portion of the Preserve.

2.2. Proposed Changes to the Project

County DPR is proposing to modify the Approved Project from the original approval and Addendum 1. Component 3 of the Project, the trails plan, specifically for the NW portion of the Preserve, would be modified to address Wildlife Agency concerns discussed in

[1] The County reports both Assessor's and GIS (Geographic Information System) acreages for conserved lands. Assessor's acreage is the formal unit of measurement the County utilizes internally for real estate acquisitions, accounting, and reporting. However, GIS acreage is calculated using data provided by the San Diego Geographic Information Source (SanGIS). Assessor's and GIS acreage totals can differ as records of the legal acreage of parcels are plotted on paper and then converted into GIS. For consistency, SanGIS data is used in this document when calculating acreage for the Preserve, such as land use, habitat, or vegetation areas, within the Preserve. Based on SanGIS parcel data, the total Preserve acreage is 3,862 acres. However, the official Preserve acreage is 3,867 acres.

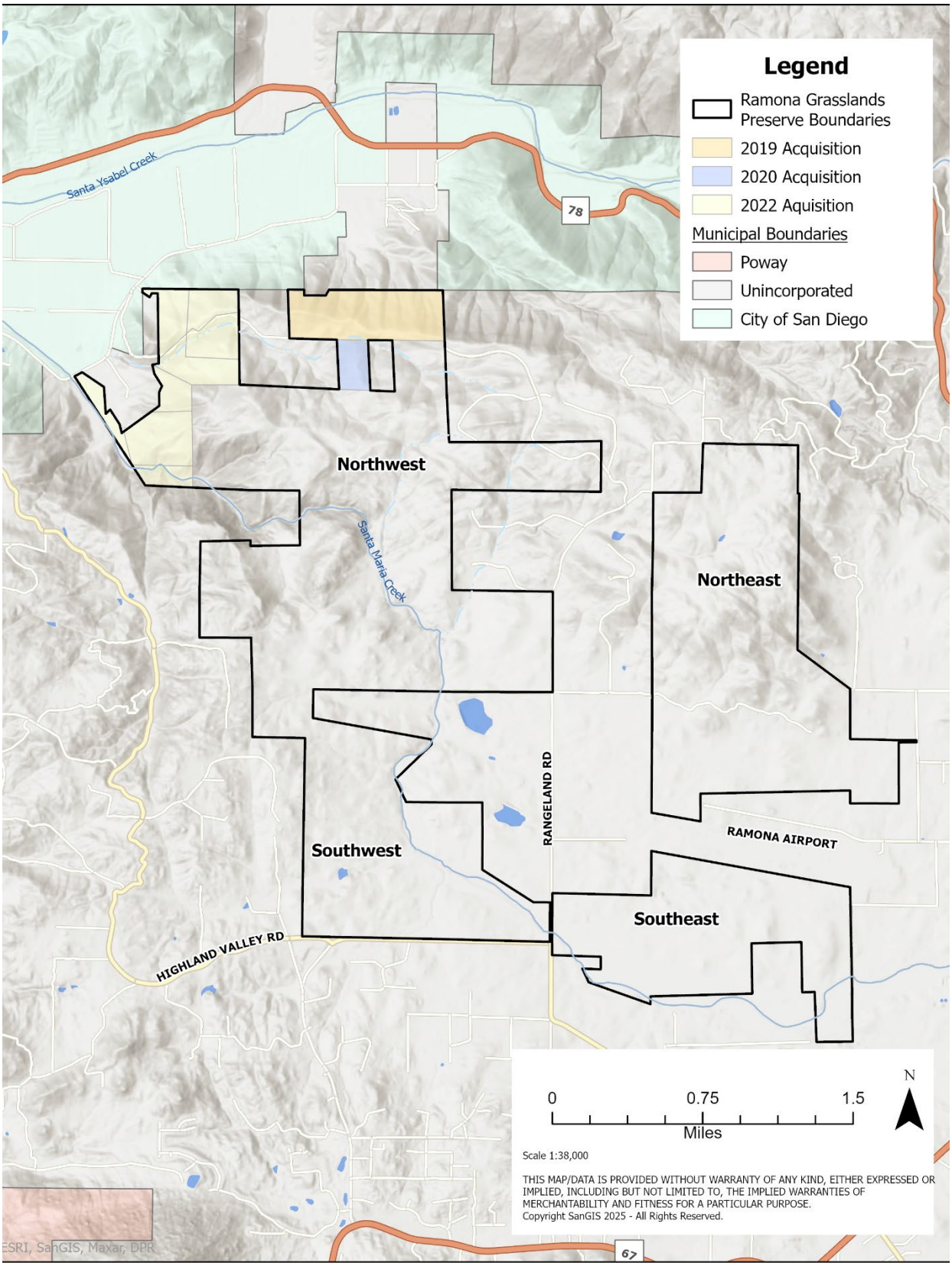


Figure 1. Preserve Local Vicinity and Sections

Section 1.2.2, while still meeting the original intent of the trail system proposed in the original MND, continuing to avoid impacts to sensitive resources to the maximum extent feasible, and allow trail users sufficient opportunity for potential future access to the regional Coast to Crest Trail in San Pasqual Valley to the north.

Components 1, 2, and 4 of the Approved Project listed in Section 1.2 will remain unchanged, and do not require additional analysis under CEQA.

The existing Old Survey Road 97 trail in the NW portion of the Preserve would be modified to close the western-most 1.1 miles of the trail to provide further setback from the offsite golden eagle nest. Measures to close the trail would include fencing, vertical mulch and signage. The closed section of the trail would be allowed to passively revegetate. The closure and passive restoration would be completed in accordance with the mitigation measures (MMs) and implementation measures (IMs) set forth in the MND and RMP respectively.

The section of the Old Survey Road 97 trail to remain open would connect to a newly constructed 1.3-mile rerouted trail alignment. The new trail alignment is routed to the least environmentally sensitive area practicable and avoids impacts to federally and/or state-listed species and identified cultural resources. The alignment was designed to remain out of the 4,000-ft nest avoidance buffer and to provide visual and auditory topographic buffers from the golden eagle nest site as the trail continues north out of the 1-mile buffer. Following meetings in 2023 and 2025, DPR received verbal concurrence from the Wildlife Agencies on moving forward with the proposed rerouted alignment. This approach is consistent with 2021 USFWS golden eagle buffer zone recommendations[2] (USFWS 2021).

Trail specifications and construction methods will be in accordance with guidelines set forth in the RMP and the Community Trails Master Plan (CTMP). The rerouted trail will be a 4-ft tread natural surface CTMP Type C trail, with travel way vegetation maintenance within an additional foot on either side of the trail (6-ft total) and 12 feet of vertical clearance (County 2009). Unavoidable impacts to sensitive vegetation communities will be mitigated offsite in accordance with MM A-8 (see Table 2). Known cultural resources have been avoided through reroute alignment design and cultural monitoring will take place during trail construction. MM B-1 through MM B-4 will be followed during vegetation clearing and ground disturbing activities.

The rerouted trail will require crossing one non-wetland water of the state (CDFW, RWQCB), the ‘Northern Drainage’. An aquatic resource assessment was conducted for

[2]The 2021 USFWS guidance generally recommends a 1-mile buffer for pedestrian and non-motorized activity including hiking, biking and horseback riding; however, the guidance provides for the buffer to be reduced in consultation with USFWS when activities are not in line-of-sight of the nest.

the drainage as part of the reroute alignment development. This drainage had not previously been assessed because the Old Survey Road 97 trail was not in proximity to the drainage. At this location, a 4-ft unimproved dry weather crossing is proposed, encompassing 24 square feet of impact area. No trees are proposed to be removed, but trees may be trimmed for vertical clearance for equestrians and understory vegetation may be cut to ground level and poison oak will be treated in the travel way. Per MND MM A-9, prior to impacting regulated waters, DPR will secure all required permits and mitigation measures will be developed through the permitting process.

North of the Northern Drainage crossing the rerouted section would provide a connection to an existing 4-ft unimproved trail, known as Kearny Trail at the northeastern end of the Preserve. Kearny Trail is not accessible to the public and access to the trail would only be from the rerouted alignment. A portion of Kearny Trail on the Preserve would be open for public access and maintained, specifically a short section to a viewpoint of San Pasqual Valley. At this point, the trail would end with a bench, access control and interpretive signage. The Diegan coastal sage scrub (CSS) around Kearny Trail is occupied coastal California gnatcatcher habitat. All trail maintenance activities would be conducted in accordance with the MND MMs and applicable RMP IMs to ensure impacts to gnatcatcher are avoided. To date, Kearny Trail has not been formally evaluated for significance and therefore consistent with the RMP, considered to be a significant cultural resource. In accordance with IM E.2.2 maintenance, erosion control and/or opening Kearny Trail shall not occur prior to completion of an approved mitigation program, such as data recovery or capping.

Following closure and passive restoration of the 1.1-mile segment of the Old Survey Road 97 trail and the completion of construction of the first segment of the rerouted alignment (Segment A 0.6-miles), the remaining portion of the Old Survey Road 97 trail and the initial reroute would be opened, consistent with the original intent for the Old Survey Road 97 trail, as an out and back multi-use (hiking, biking, equestrian use) year-round trail. The weekend and seasonal trail restrictions and permit requirements enacted as part of Addendum 1 would be removed at the same time. Completion of the remaining segments would be phased in over the subsequent three to five years. DPR will continue to conduct golden eagle and other species monitoring and will continue to evaluate public access to ensure there are no impacts to the onsite natural resources. If any impacts are identified, DPR will implement adaptive management strategies consistent with the RMP.

Table 1 summarizes the changes to the trail plan in the NW portion of the Preserve proposed in the Revised Project in redline/strikeout. Figure 2 displays a map of the proposed Revised Project and Figure 3 depicts the planned segments for phasing.

Table 1. Original MND and Revised Project Trail Miles for NW Portion of the Preserve

Trail Segment	Trail/Pathway Miles			Notes
	Existing	New	Total	
Old Survey Road 97 and public road easement connection from Rangeland Road	~~2.9~~ 1.8	0.0	~~2.9~~ 1.8	1.06 miles of existing 2.9 miles to be closed and passively restored
Reroute for Old Survey Road	0.0	1.3	1.3	1.26 miles of new construction will utilize project design measures, and existing MMs and IMs.
Kearny Trail	0.2	0.0	0.2	Reroute will connect to the existing unimproved Kearny Trail, maintenance (vegetation trimming) and erosion control will be conducted along a 0.38-mile segment. Only 0.23 miles will be open to the public.
NW-SW Connector and Proposed Creek Crossing	0.0	0.8	0.8	No change to mileage. This trail segment has not been completed to date.
New NW Trail Total	**~~2.9~~ 2.0**	**~~0.8~~ 2.1**	**~~3.7~~ 4.1**	
Net Change	-0.9	+1.3	+0.4[1]	

Note:

1. Column totals may not sum to the new trail total due to mileage being rounded to the nearest tenth. The proposed net increase in trail miles is 0.43 miles.

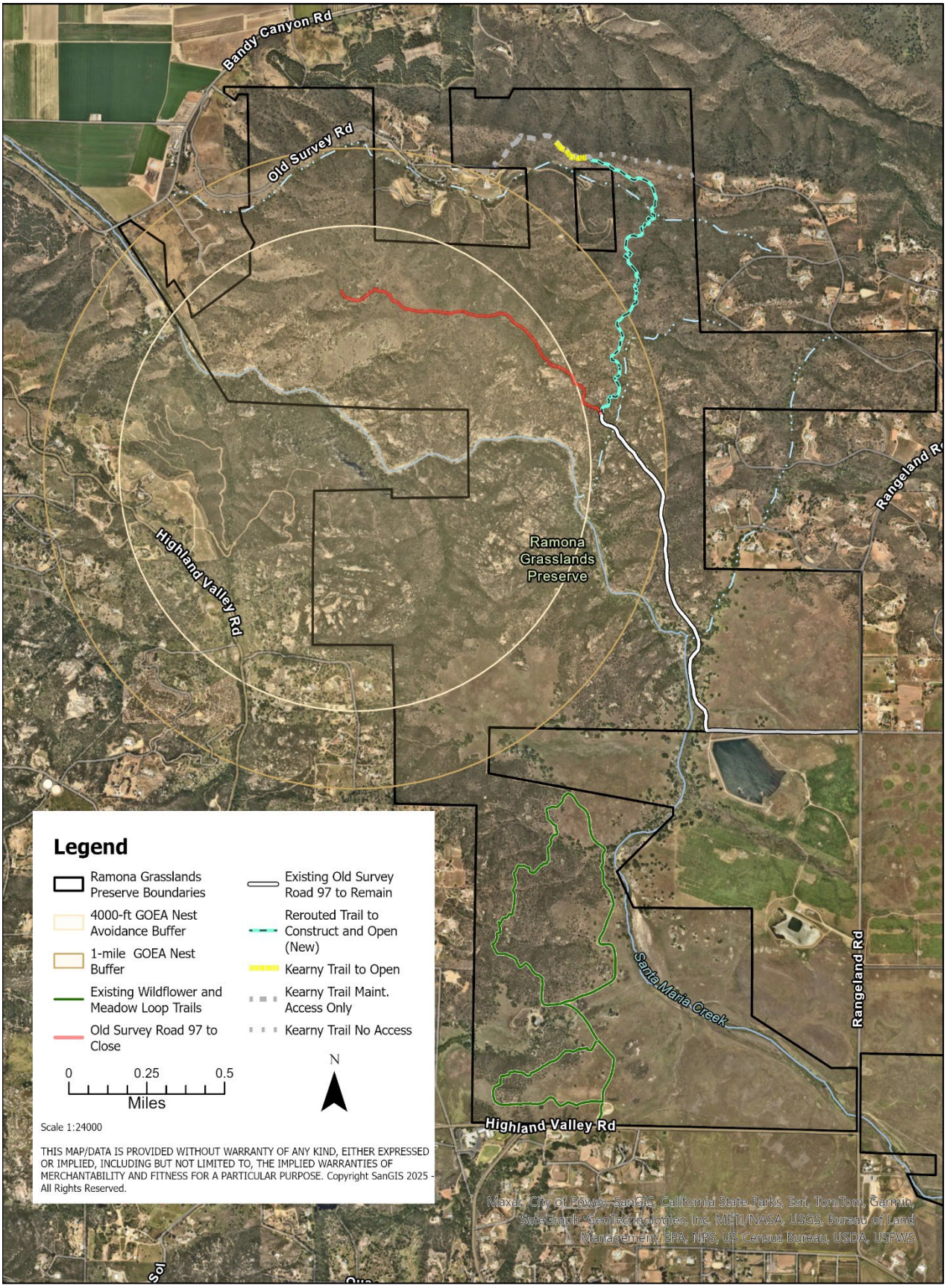


Figure 2. Revised Project Overview -Old Survey Road 97 Trail Closure, Trail Reroute and Connection to the Existing Kearny Trail

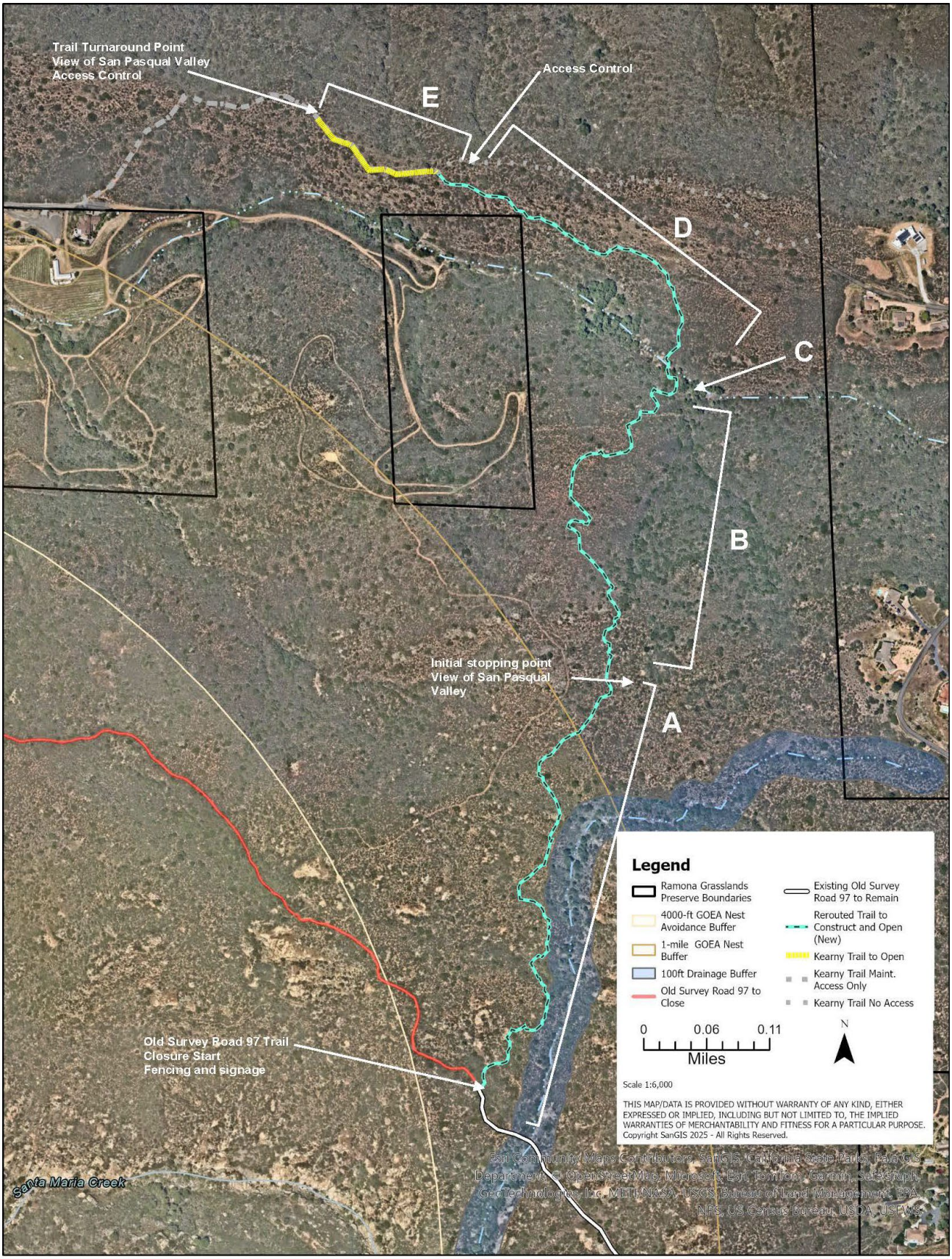


Figure 3. Trail Segments A through E for Phasing

2.3. Mitigation and Implementation Measures

Mitigation measures identified for the Approved Project listed in Table 2 would be sufficient in addressing the requirements for the Revised Project. There are no new impacts beyond what was addressed in the Adopted MND. Lastly, there are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162.

Applicable Management Directives and Implementation Measures (IMs) of the RMP and Mitigation Measures (MMs) from the Adopted MND are listed in Table 2 and Table 3. In some cases, the language of the applicable IMs and MMs in this Addendum has been updated to reflect minor changes as shown in redline/strikeout. Pursuant to MM A-8, Table 4 lists the additional mitigation acreage by vegetation community as a result of construction of the 1.3-mile rerouted trail alignment and maintenance activities (vegetation trimming, erosion control) along Kearny Trail.

In addition to the IMs and MMs, specific project design measures that ensure no impacts on golden eagles and other sensitive resources have been incorporated into the project and will include the following:

- All Revised Project activities will occur outside of the 4,000-ft nest buffer.
- The rerouted trail alignment is within 1-mile of the nest but in accordance with USFWS recommendations as discussed in Section 2.2, the trail is not within line of sight of the nest and is routed so that there are continual visual and auditory topographic buffers between the trail and the nest site. The alignment route is also minimized within 1 mile of the nest to the maximum extent feasible.
- Closure and passive restoration of 1.1 miles of Old Survey Road 97 to ensure access control and enhance onsite habitat.
- Additional access control and educational signage will include cultural resource and wildlife interpretive elements including specific information on golden eagle protection and sensitivity.
- Trail usage and compliance with the trail closure will be monitored through trail counters. Trail cameras and DPR staff patrols will also be used.
- The Ramona Grasslands Raptor Study will continue through DPR's Targeted Monitoring Program. Monitoring data will inform any future adaptive management activities.
- A 50-100-ft buffer from Drainage 3 provides further resource protection.
- Utilize the existing disturbed road (Kearny Trail) and disturbed footpaths to connect to Kearny Trail to minimize additional impacts from ground disturbance.

- Prior to conducting activities in coastal California gnatcatcher occupied CSS, a qualified biologist will conduct focused monitoring for gnatcatcher and flag areas for avoidance.
- Archeological and biological pre-construction surveys will be conducted prior to all ground disturbing activities.
- Construction personnel will be required to attend cultural and biological resource awareness and sensitivity training prior to commencement of reroute alignment construction.

Table 2. Applicable Mitigation Measures from the Adopted MND

MM	Description	Revised Project's Consistency
BIOLOGICAL RESOURCES (A)[1]		
MM A-1	In order to avoid potential impacts on federally and/or state-listed plant species, the following measures shall be implemented: a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by listed plant species to ensure avoidance. b. Focused surveys for listed plant species shall be conducted within the offsite east-west trail easement that connects the eastern and western portions of the Preserve and within the vicinity of the proposed new offsite trail segment on the Ramona Municipal Water District (RMWD) property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trail in these offsite locations shall avoid impacts on listed plant species.	The Revised Project has been designed to avoid areas occupied by federally and/or state listed plant species. No federally and/or state listed plant species have been identified in the NW portion of the Preserve.
MM A-2	In order to avoid potential impacts on County List A and/or B plant species, the following measures shall be implemented: a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by County List A and B plant species to ensure impacts are avoided or minimized to the extent feasible. b. Focused surveys for County List A and B plant species shall be conducted within the offsite east-west trail easement that connects the eastern and western portions of the Preserve, and within the vicinity of the proposed offsite trail segment on the RMWD property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trails in these offsite locations shall avoid impacts on County List A and B plant species to the maximum extent feasible.	The Revised Project has been designed to avoid areas occupied by County List A and/or B plant species. San Diego Milkvetch (List A) has been documented in the NW portion of the preserve but not within 2,000 feet of the project area. A biological monitor shall inspect plant species in the project area during pre-construction surveys.
MM A-6	Vegetation clearing or grading shall be restricted during the breeding season for migratory birds (approximately January 15 through September 15 annually) unless pre-construction surveys by a qualified biologist determine no nesting birds protected by the MBTA are located within grading/vegetation clearing areas. If active nests are identified within the impact area on site, vegetation clearing activities shall not occur within 300 feet of active migrant songbird nests, 500 feet of active tree nesting raptor nests, 300 feet of active burrowing owl burrows, and 800 feet of other ground-nesting raptor nests until either the breeding season has ended or the nest is no longer active.	This measure will be followed. Construction and clearing are planned to occur outside of bird breeding season. However, should activities be required to occur during bird breeding season, a qualified biological monitor will conduct a pre-construction nesting bird survey to confirm no active nests are identified or implement the listed avoidance measures (i.e., applicable active nest buffers).
MM A-8	Significant impacts on sensitive natural communities resulting from unavoidable impacts will be offset by the offsite preservation of habitat, the purchase of mitigation credits within an approved mitigation bank, or in accordance with County Board Policy I-138 at established mitigation ratios (e.g., in accordance with ratios outlined in the county's adopted MSCP or, when adopted, the North County Plan).	DPR will offset unavoidable impacts to sensitive natural communities from the reroute alignment construction through offsite preservation of habitat, or in accordance with County Board Policy I-138 at the established mitigation ratios.
MM A-9	Prior to impacting regulated waters, including wetlands, the following permits/approval would be required to be obtained: (1) USACE, CWA, Section 404 permit for placement of dredged or fill material within waters of the U.S.; (2) RWQCB, CWA, Section 401 State water quality certification/waiver for an action that may result in degradation of waters of the State; (3) CDF~~G~~ Streambed Alteration Agreement. If a span bridge is constructed for the proposed crossing of Santa Maria Creek (or if the alternative crossing of Santa Maria Creek on the RMWD property is utilized), impacts would be avoided and no mitigation would be required. While the construction of a trail/dry weather crossing of Santa Maria Creek would result in impacts; wetland creation is not proposed. The impact area, and immediately adjacent areas, is currently unvegetated and after project implementation, would continue to convey water. Mitigation for impacts on jurisdictional wetlands (disturbed wetland and non-vegetated channel) and non-wetland waters is proposed to consist of offsite restoration and/or enhancement. The details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB.	MM A-9 will be followed for the Northern Drainage crossing and the associated anticipated 24 square feet of impact to State non-wetland waters.
MM A-11	The following avoidance and minimization measures for golden eagle shall <u>be implemented:</u> a. Closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known location. b. On-going monitoring and adaptive management of the Preserve to facilitate docent led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known offsite nest locations to determine occupancy during the breeding period (December through June). c. DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts on golden eagles.	MM A-11 will be followed. A-11 (a) and (d) were previously completed with the closure of the southern spur of the Old Survey Road 97 trail in 2018-2019. A-11 (b) on-going monitoring and adaptive management of the Preserve initially supported the facilitation of docent led tours, but monitoring and adaptive management will continue. Consistent with A-11 (f), 1.1 miles of the Old Survey Road 97 trail closest to the

	d. Planting of cactus thickets along the portion of the trail within the NW portion of the Preserve closest to the known off-site golden eagle nesting location to deter off-trail use. e. Installation of fencing, signage or other barriers to avoid off-trail disturbance to known breeding locations, foraging habitat, and preferred perch spots. f. Development and implementation of passive and/or active restoration of abandoned trails and other areas that may encourage off-trail activities. g. Continued maintenance to control the spread of invasive exotic plant species within the Preserve.	nest site will be abandoned and passive restoration will be implemented. Fencing and signage A-11 (e.) will be used to block the 1.1-mile closure area in addition to vertical mulch (see also IM B.1.1).
CULTURAL RESOURCES (B)		
MM B-1	Prior to any ground-disturbing activities prescribed in the RMP and VMP, including fire management, invasive nonnative plant removal efforts, and revegetation, the proposed area of activity will be reviewed for cultural resources. If cultural resources occur in the area, ground disturbing impacts in the area of the resource should be avoided, thereby fulfilling the management directives for cultural resources. To avoid impacts, the RMP and VMP generally stipulate the use of techniques that would not disturb the ground, such as passive habitat restoration and vegetation removal. If avoidance and non-destructive methods are infeasible, the affected resource should be evaluated for significance by a qualified archaeologist, per County guidelines.	MM B-1 will be followed. The revised project was designed to avoid CA-SDI-19561. Impacts to P37-030845 will be minimized through MM B-2. Impacts to Kearny Trail (Record ID # pending) will be minimized through IM E.2.2, MMs B-2 and B-3.
MM B-2	Prior to the construction of any new trail segments or the proposed bridge, all of which were located to avoid cultural resources, the locations of new construction shall be field checked by a qualified archaeologist to ensure that they do indeed avoid known cultural resources. To avoid adverse impacts on P-37-030845 (County Survey Road 97), a federal, state, and locally significant resource, a passive form of revegetation shall be adopted for restoration of the southern loop trail and the northwestern 1.1 miles of County Survey Road 97. For CA-SDI 127010270, a resource located along the proposed east- west connector trail on non-Preserve land, the location of the site shall be confirmed in the field by a qualified archaeologist and the trail shall be rerouted if possible to avoid impacts. If avoidance is infeasible, the resource should be evaluated for significance by a qualified archaeologist, per County guidelines. The location of the proposed viewing pavilion/kiosk in the NE portion of the Preserve shall be designed to avoid the one cultural resource in the area, CA-SDI-16628. All trail signs, markers, fencing, and gates in the Preserve should be placed in areas that avoid known cultural resources. If this recommendation cannot be met, ~~MM-4~~ MM-3[2] shall be followed during installation.	MM B-2 will be followed. The 1.3 mile new trail segment proposed in the Revised Project including associated signage was located to avoid cultural resources.
MM B-3	All ground-disturbing activity related to implementation of the project, including installation of trail signage, potential building removal, trenching, grading associated with trail installation, etc., shall be monitored by a qualified archaeologist and, where the resource involved is a prehistoric archaeological site, by a Native American representative. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until a qualified archaeologist can evaluate the find and make appropriate recommendations for treatment.	MM B-3 will be followed. A qualified archeologist and Native American monitor will be present for all ground-disturbing activities associated with the Revised Project.
MM B-4	Any ground-disturbing activities on the Preserve must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to CEQA Guidelines Section1 5064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance. Should Native American human remains be identified during ground disturbing activities related to the project, whether during construction, maintenance, or any other activity as outlined in the RMP and VMP, State and County mandated procedures shall be followed for the treatment and disposition of those remains, as follows: In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DPR will ensure that the following procedures are followed: a. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains, until: 1. A County (DPR) official is contacted. 2. The County Coroner is contacted to determine that no investigation of the cause of death is required. 3. If the Coroner determines the remains are Native American, then: i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. iii. The Most Likely Descendent (MLD) may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in PRC Section 5097.98. b. Under the following conditions, the landowner or its authorized representative shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further disturbance: 1. The NAHC is unable to identify a MLD or the MLD fails to make	For all ground-disturbing activities associated with the Revised Project, MM-B-4 will be followed.

	a recommendation within 24 hours after being notified by the NAHC. 2. The MLD fails to make a recommendation. 3. The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner. c. Any time human remains are encountered or suspected and soil conditions are appropriate for the technique, ground penetrating radar (GPR) will be used as part of the survey methodology. In addition, the use of canine forensics will be considered when searching for human remains. The decision to use GPR or canine forensics will be made on a case-by-case basis through consultation among the County Archaeologist, the project archaeologist, and the Native American monitor. d. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as: 1. Cremations, including the soil surrounding the deposit. 2. Interments, including the soils surrounding the deposit. 3. Associated grave goods. In consultation among the County archaeologist, project archaeologist, and Native American monitor, additional measures (e.g., wet-screening of soils adjacent to the deposit or on site) may be required to determine the extent of the burial.	

Table Notes:

1. The mitigation measure table in the Adopted MND did not include the ‘A’ biological and ‘B’ cultural alpha identifier; these identifiers have been added to the table for clarity.
2. Errata correction, Adopted MND numbering of cultural mitigation measures changed between the original and adopted, the numbering was corrected, except in this reference. Original cultural MM-4 became MM-3 in the Adopted MND.

Table 3 Applicable RMP Implementation Measures (IMs)

Management Directive	IM	Description	Revised Project's Consistency
Biological Resources Element (A)			
A.4	Provide for management and monitoring of Draft North County Plan and MSCP Subarea Plan covered species and County Group A and B plant species		
	A.4.1 through A.4.33	DPR will implement habitat-based and in some cases species-specific monitoring and management including monitoring for risks/threats. IMs for each of the covered species are listed in the RMP. [Golden eagle IMs were revised through Addendum 1]	Management Directive A.4 includes measures for golden eagle, Engelmann oak, and other covered species. Monitoring and habitat maintenance activities associated with the Revised Project are consistent with Directive A.4 IMs as modified for golden eagle by Addendum 1.
Vegetation Management Element (B)			
B.1	Restore degraded habitats to protect and enhance populations of rare and sensitive species through stabilization of eroded lands and strategic revegetation		
	B.1.1	…If determined to be necessary, vertical mulching, or another type of barrier will be applied at the end points of closed trails to prevent public access into trail restoration areas.	Vertical mulch will be placed behind fencing to obstruct the trail to prevent public access to the Old Survey Road 97 restoration area.
Public Use, Trails, and Recreation Element (C)			
C.2	Manage public access in sensitive biological and cultural resource areas within the Preserve		
	C.2.2	DPR will provide sufficient signage to clearly identify public access to the Preserve when open to the public. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. The appropriate types of barriers to be used will be determined based on location, setting, and use. Monitor new developments adjacent to the Preserve to enforce non-authorized trail use.	Fencing will be used to close the section of trail, signage will be modified at kiosks to communicate the new closure. Signage will be used at control points to communicate authorized and unauthorized access points. Educational interpretive signage will also be used.
	C.3.3	DPR will monitor the number and types of trail users and identify peak usage times. Data will help determine if seasonal restrictions on public trail use should apply.	DPR monitoring of the trail reroute will include use of trail counters, wildlife cameras and monitoring by staff.
C.5	Properly maintain trails for user safety, to protect natural and cultural resources, and to provide high-quality user experiences.		
	C.5.1	DPR will discourage Preserve users from using any redundant or unnecessary trails that currently exist on the Preserve by obstructing trailheads with brush, fencing or rocks, etc.	See C.2.2. above
	C.5.2	DPR will monitor trails for degradation and off trail access and use and provide necessary repair/maintenance per the Community Trails Master Plan.	C.5.2 will be followed for the all trails in the Preserve including those established through the Revised Project.
	C.5.4	DPR will restore degraded habitats and reduce detrimental edge effects through maintenance and stabilization of trails and strategic revegetation.	C.5.4 will be followed for all trails including those associated with the Revised Project.
	C.5.7	Trail maintenance activities will be conducted and monitored such that impacts on federally or state listed species and County List A and B plant species, including arroyo toad, San Diego fairy shrimp, and southern tarplant are avoided.	C.5.7 will be followed for activities associated with the Revised Project.
	C.5.11	Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic.	C.5.11 will be followed for activities associated with Revised Project.
Operations and Facility Maintenance Element (D)			
D.6	Retain unnamed tributaries to Santa Maria Creek in their natural condition		
	D.6.1	No additional activities will be proposed adjacent to the unnamed tributaries that exist in the SW ~~and NW~~ portion~~s~~ of the Preserve. Potential threats to jurisdictional waters from any activities including trail use shall be identified and impacts avoided to the maximum extent practicable.	This implementation provides for impact identification and avoidance from trail impacts. The rerouted alignment considered unnamed tributaries/drainages and the trail was sited to reduce and avoid impacts to the maximum extent practicable by utilizing existing drainage crossings, designing the reroute outside a buffer from Drainage 3 and limiting the drainage crossing to one location. In addition, the location of Northern Drainage crossing was selected to coincide to avoid impacts on wetlands. The crossing will be a dry weather

Management Directive	IM	Description	Revised Project's Consistency
			unimproved crossing with vegetation removal to surface level only. The final mitigation for the anticipated 24 square feet of impact to non-wetland waters of the State will be determined in accordance with MM A-9.
Cultural Resources Element (E)			
E.1	Identify, record, and assess the significance of cultural resources within the Preserve in areas over 20 percent slope		
	E.1.1	DPR will identify and record cultural resource sites in those areas of the Preserve where, if in the future, brush is removed as a result of wildfire or planned ground-disturbing activities including clearing, grubbing, or new trail development efforts. […] a County-approved cultural resources consultant and Native American monitor will be on site during the survey of areas where planned ground disturbing activities or brush removal will occur.	Prior to ground disturbing activities associated with the Revised Project a County-approved cultural resources consultant and Native American monitor will be on site during a pre-construction survey of the areas where ground disturbing activities or brush removal will occur.
E.2	Preserve and protect significant cultural resources to ensure that sites are available for appropriate uses by present and future generations.		
	E.2.2	All management activities within the Preserve, including but not limited to, trail construction and maintenance, placement of fencing and gates, and active habitat restoration will take into consideration potential impacts on cultural resources and shall avoid adverse impacts on any cultural resources to the maximum extent possible. No ground disturbing activities will be allowed on or in any cultural resource site within the preserve until the impacts have been assessed. If avoidance of significant sites is not feasible, appropriate mitigation measures will be established and consultation with Native American tribes will occur. Removal or disturbance of cultural resources shall not occur prior to completion of an approved mitigation program, such as data recovery or capping. Preservation in place is the preferred mitigation measure.	E.2.2 will be followed in conjunction with MM B-1
E.5	Develop and implement proper protocols in the event that Native American human remains are found during grading, brush removal, or other construction and maintenance activities.		
	E.5.1	In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DPR will ensure that the established procedures are followed (see RMP for additional detail).	E.5.1 see further details under MM B-4.

Table 4 Sensitive Vegetation Community Mitigation per MM A-8 for the Revised Project Activities

Vegetation Community	Holland Code	MSCP Tier	Impact Acreage (MSCP Subarea)	Impact Acreage (Draft NC Plan Area)	Total Impact Acreage	Mitigation Ratio[1,2]	Required Mitigation (Acres)
Sensitive Vegetation Communities							
Dense Coast Live Oak Woodland	71162	I	0.02	-	0.02	2:1	0.04
Coastal Sage-Chaparral Scrub	37G00	II	0.26	0.20	0.46	1.5:1	0.69
Diegan Coastal Sage Scrub	32500	II	0.25	0.07	0.32	1.5:1	0.49
Scrub Oak Chaparral	37900	III	-	0.09	0.09	1:1	0.09
Total			**0.53**	**0.36**	**0.89**	-	**1.31**
Other							
Disturbed Habitat (Road)	11300	IV	0.04	-	0.04	None	-

Notes:

1. The Preserve is a biological resource core area (BRCA) and the ratio shown is based on mitigation occurring on land that meets the criteria for a BRCA.
2. Should the North County Plan become adopted prior to the implementation of construction in the portion of the Preserve within the North County Plan area, the mitigation ratios may change in accordance with the plan.
3. Redline rows- the CSS vegetation community impacts were analyzed in the original MND but removed from the Adopted MND table. Scrub oak chaparral community is a new entry. Vegetation community mitigation associated with trail reroutes was analyzed in the Adopted MND and ratios are consistent with MM A-8.

3.0 Environmental Analysis

As described in Section 2.0, Project Description, a change to the Approved Project has been proposed since the preparation of the MND. As such, the following comparative analysis has been undertaken pursuant to the provisions of CEQA Guidelines Sections 15162 and 15164 to provide the factual basis for determining whether changes in the Approved Project, changes in circumstances, or new information since adoption of the MND would require additional environmental review. It should be noted that in accordance with CEQA Guidelines 15007(c), this Addendum to the Adopted MND is not required to conform to new requirements established by Guideline amendments since the MND entered public review. This analysis focuses on whether the impact significance conclusions identified in the Adopted MND would change under the Revised Project.

The environmental analysis provided in the Adopted MND remains current and applicable to the Approved Project in areas unaffected by the Revised Project for the environmental topics detailed in this section. An overview of the Approved Project and Revised Project impacts in relation to the Adopted MND is provided in Table 5.

Table 5. Impact Summary Table

Environmental Issue	Adopted MND	Revised Project[1]	New Mitigation?
Aesthetics	Less than significant	No new impacts	No
Agricultural and Forestry Resources	Less than significant	No new impacts	No
Air Quality	Less than significant	No new impacts	No
Biological Resources	Less than significant with mitigation	No new impacts[2]	No
Cultural Resources	Less than significant with mitigation	No new impacts[2]	No
Geology and Soils	Less than significant	No new impacts	No
Greenhouse Gas Emissions	Less than significant	No new impacts	No
Hazards and Hazardous Materials	Less than significant	No new impacts	No
Hydrology and Water Quality	Less than significant	No new impacts	No
Land Use Planning	Less than significant	No new impacts	No
Mineral Resources	Less than significant	No new impacts	No
Noise	Less than significant	No new impacts	No
Population and Housing	Less than significant	No new impacts	No
Public Services	Less than significant	No new impacts	No
Recreation	Less than significant	No new impacts	No
Transportation/Traffic	Less than significant	No new impacts	No
Utilities and Service Systems	Less than significant	No new impacts	No
Mandatory Findings of Significance	Less than significant with mitigation	No new impacts	No

Table notes:
1. This response indicates that there would be no new significant impacts or no substantial increase in the severity of previously identified significant impacts
2. Mitigation measures as described in the MND will be followed.

3.1. Aesthetics

The Adopted MND for the Approved Project identified that there would be less than significant impacts to aesthetics. The changes to the multi-use trail system proposed in the Revised Project would not result in additional impacts on aesthetics beyond those identified for the multi-use trail system in the Adopted MND.

3.2. Agriculture and Forestry Resources

The Adopted MND for the Approved Project identified that there would be less than significant impacts to agriculture and forestry resources. The Revised Project would not result in additional impacts on agriculture and forestry resources beyond those identified in the Adopted MND.

3.3. Air Quality

The Adopted MND for the Approved Project identified that there would be less than significant impacts to air quality. The analysis was based on the consideration of project activities including the multi-use trail system and year-round public use of the Old Survey Road 97 trail in the NW portion of the Preserve. Short-term trail construction and grading were also analyzed. Therefore, the Revised Project would not result in additional impacts on air quality beyond those identified in the Adopted MND.

3.4. Biological Resources

The Adopted MND analyzed impacts to biological resources associated with implementation of the Approved Project and identified areas of potential impact, including adverse effects on special-status species, sensitive natural communities, locally significant species, and wetlands. MMs were established to reduce the level of impact to less than significant.

The Revised Project occurs in the same area with the exception of a portion located on parcels acquired after 2013 (2019 and 2020 acquisitions). These parcels expanded the preserve boundaries and are subject to the RMP Management Directives and IMs.

Species found within the parcels and habitat types are consistent with those addressed in the RMP and Adopted MND and the Revised Project would be subject to similar biological conditions. Impacts to biological resources from the Revised Project would be similar to those analyzed in the Adopted MND for the Approved Project, specifically the multi-use trail system. MMs identified in the Adopted MND together with RMP IMs and project design measures would ensure that the severity of impacts to biological resources from the Revised Project are not substantially different and are consistent with the Adopted MND. Impacts from the Revised Project would be reduced to a less

than significant level through the Adopted MND MMs and no new measures are required.

The comparison of potential impacts of the Approved and Revised Project in relation to the Adopted MND are described further below. The analysis focuses on the NW portion of the Preserve where the Revised Project activities are proposed to occur.

The Revised Project includes trail closure, passive restoration of the closed section of trail, rerouted trail alignment construction, and maintenance of an existing trail. There are no potentially significant impacts to biological resources from the trail closure and associated passive restoration alone. Therefore, this analysis discusses the potential impacts associated with the reroute and trail maintenance activities.

Sensitive Plant Species

Sixteen special status plant species have been documented in the Preserve. Of the sixteen species, four were found within the NW section of the Preserve as shown in Table 6.

Adopted MND: The analysis concluded that construction of the new trail segments within the Preserve would not result in direct impacts on special-status plant species as none were observed within the proposed impact areas during any of the surveys conducted at the Preserve. The Adopted MND also considered the future need to reroute trails, while specifically noted for erosion, the conclusion is applicable to reroutes implemented for other reasons because the focus is on new ground disturbance. The Adopted MND concluded that potential direct impacts on special-status plant species would not occur as a result of such activities as trails would be rerouted to the least environmentally sensitive areas and would avoid previously surveyed populations

Table 6. Sensitive Wildlife Species Detected within the Preserve

Common (Scientific) Name	Sensitivity Status[1]
San Diego thornmint (*Acanthomintha ilicifolia*)	Federal: Threatened State: Endangered CRPR: 1B.1 County: List A; South and Draft North County Plan Covered; MSCP Narrow Endemic
Palmer's sagewort (*Artemisia palmeri*)[2]	CRPR:4.2 County: List D
San Diego milkvetch (*Astragalus oocarpus*)[2]	CRPR: 1B.2 County: List A
Round leaved filaree (*California macrophylla*)	County: List B
Coulter's saltbush (*Atriplex coulteri*)	CRPR: 1B.2 County: List A
Parish's brittlescale (*Atriplex parishii* var. *parishii*)	CRPR: 1B.1 County: List A
Ramona spineflower (*Chorizanthe leptotheca*)	CRPR: 4.2 County: List D

Common (Scientific) Name	Sensitivity Status[1]
Small-flower bindweed (*Convolvulus simulans*)	CRPR: 4.2 County: List D
Southern tarplant (*Centromadia parryi* ssp. *australis*)	CRPR: 1B.1 County: List A
Graceful tarplant (*Holocarpha virgata* ssp. *elongata*)	CRPR: 4.2 County: List D
Southwestern spiny rush (*Juncus acutus* ssp. l*eopoldii)*	CRPR: 4.2 County: List D
California adder's tongue (*Ophioglossum californicum*)	CRPR: 4.2 County: List D
Vernal barley (*Hordeum intercedens*)	CRPR: 3.2 County: List C
Spreading navarretia (*Navarretia fossalis*)[3]	Federal: Threatened CRPR: 1.B.1 County: List A, Draft North County Plan Covered
Engelmann oak (*Quercus engelmannii*) [2]	CRPR: 4.2 County: List D, Draft North County Plan Covered
Rush-like bristleweed (*Xanthisma junceum*) [2]	CRPR:4.3 County: List D

Table Notes:

1. Status Legend:

County of San Diego Sensitive Plant List

- List A: Plants rare, threatened or endangered in California or elsewhere
- List B: Plants rare, threatened or endangered in California but more common elsewhere
- List C: Plants which may be quite rare, but need more information to determine their true rarity status
- List D: Plants of limited distribution and are uncommon, but not presently rare or endangered

California Rare Plant Ranks (CRPR, formally known as CNPS (CNPS 2016))

- 1A: Plants presumed extirpated in California and either rare or extinct elsewhere
- 1B: Plants rare, threatened or endangered in California or elsewhere
- 2A: Plants presumed extirpated in California, but common elsewhere
- 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
- 3: Plants about which more information is needed — a review list
- 4.1: Plants of limited distribution; seriously threatened in California
- 4.2: Plants of limited distribution; moderately threatened in California
- 4.3: Plants of limited distribution; not very threatened in California

2. Species documented in the NW portion of the Preserve (**bold text**)
3. Not documented on preserve but known to occur on adjacent parcels in SE portion of the Preserve

Revised Project:

State and/or Federally Listed Species: Two state and/or federally listed special status plant species have been documented in the Preserve. These species and their critical habitat have not been documented to occur in the NW portion of the Preserve. Therefore, there are no direct or indirect impacts to State or Federally listed plant species from the Revised Project.

County List A and B Plant Species: Of the List A and B plant species documented in the Preserve, one List A species is known to occur within the NW quadrant, San Diego milkvetch. Observed occurrences are a minimum of 2,000 feet from the proposed trail reroute. Therefore, the Revised Project does not introduce new direct or indirect impacts to County List A and B species.

MSCP, Draft North County Plan Covered and County List D and C Plant Species:
Three County List D including one draft North County (NC) Plan covered species occur within the NW portion of the Preserve. Of these species, Engelmann oak and rush-like bristleweed occur within the trail reroute project area covered under the Revised Project.

- Direct impacts to Engelmann oak (County List D, Draft NC Plan) trees will be avoided through the trail reroute. Three trees were identified in proximity to the new trail route during resource evaluation. The first is outside of the trail and a 50-ft trail buffer area. The trail is downslope from the tree. The remaining two are within the dripline of the Northern Drainage that the trail will cross. Prior to trail construction near the drainage, the trees will be flagged by a qualified biologist to ensure avoidance, and an appropriate buffer will be established around them.
- Rush-like bristleweed (County List D) occurs in close proximity to the trail reroute. While individual occurrences are avoided, the species is locally abundant. To avoid direct impacts from construction, a qualified biologist will conduct a pre-construction survey to flag known occurrences that would be avoided during construction. The species is known to favor growing in margins in cleared areas within the habitat, therefore direct and indirect impacts from trail construction and usage have the potential to occur. However, per the California Rare Plant Rank designation of 4.3 and County D listing, the species is not rare or endangered locally and impacts would not reach a threshold of significance because the trail would not impact the local long-term survival of the List D species.
- Palmer sagewort (County List D) occurrences are greater than 3,000 feet from the rerouted trail and therefore no direct or indirect impacts from trail construction and usage have the potential to occur.

Sensitive Wildlife Species
Forty-five special status wildlife species have been documented in the Preserve (Table 7). Of these species, 35 have been observed in the NW portion of the Preserve. Others, such as San Diego fairy shrimp have not been documented in the NW portion of the Preserve where there is a lack of suitable habitat. A resource assessment was conducted for the reroute effort. Existing occurrence information was compiled along with results from new biological surveys. This analysis focuses on species found or with potential to occur in the NW quadrant and project area.

Adopted MND: The Adopted MND for the Approved Project concluded that construction of new trail segments as part of the multi-use trail system has the potential for direct and indirect impacts to sensitive wildlife species. Impacts to sensitive wildlife species would be mitigated to less than significant levels through use of multiple MMs such as biological monitoring. Additionally, the Adopted MND concluded that the long-term

implementation of the RMP, which involves long term maintenance and adaptive management of the Preserve, including the multi-use trail system, includes management directives to protect and benefit species

Table 7. Sensitive Wildlife Species Detected within the Preserve

Common (Scientific) Name	Sensitivity Status (Federal/State/County Covered)[1]
Invertebrates	
San Diego fairy shrimp (*Branchinecta sandiegonensis*)	Federal: Endangered County: Group 1, South and North County Plan Covered MSCP Narrow Endemic
Reptiles & Amphibians	
Orange-throated whiptail (*Aspidoscelis hyperythra beldingi*)[2]	State: WL County: Group 2; South County Plan Covered
Coastal whiptail (*Aspidoscelis tigris stejnegeri*) [2]	State: SSC County: Group 2
Red diamond rattlesnake (*Crotalus ruber ruber*)	State: SSC County: Group 2
Coronado skink (*Eumeces skiltonianus interparietalis*) [2]	State: WL County: Group 2
Coastal rosy boa (*Charina trivirgata roseofusca*)[2]	County: Group 2
Blainville's (coast) horned lizard (*Phrynosoma blainvillii*) [2]	State: SSC County: Group 2, South and North County Plan Covered
Arroyo toad (*Bufo microscaphus californicus*) [2]	Federal: Endangered State: SSC County: Group 1, South and North County Plan Covered; MSCP Narrow Endemic
Western spadefoot *(Spea hammondi)*[2]	State: SSC County: Group 1, North County Plan Covered
Two-striped garter snake (*Thamnophis hammondii hammondii*)[2]	State: SSC County: Group 1, North County Plan Covered (Indicator Species)
Avian	
Cooper's hawk (*Accipiter cooperii*) [2]	State: WL County: Group 1, South County Plan Covered
Ferruginous Hawk (*Buteo regalis*)	State: WL County: Group 1, South County Plan Covered
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)[2]	State: WL County: Group 1, South County Plan Covered
Golden eagle (*Aquila chrysaetos*)[2,3]	State: FP, WL County: Group 1, North County Plan Covered, MSCP Narrow Endemic
Burrowing owl (*Athene cunicularia*)	State: SSC County: Group 1, South and North County Plan Covered, MSCP Narrow Endemic
Red-shouldered hawk (*Buteo lineatus*)[2]	County: Group 1
Turkey vulture (*Cathartes aura*) [2]	County: Group 1
Northern harrier (Circus hudsonious)[2]	Federal: BCC State: SSC County: Group 1, South and North County Plan Covered (Indicator Species)

Common (Scientific) Name	Sensitivity Status (Federal/State/County Covered)[1]
California horned lark (*Eremophila alpestris actia*)	State: WL County: Group 2
Bald eagle (*Haliaeetus leucocephalus*) [2]	Federal: BCC State: FP, Endangered County: Group 1, North County Plan Covered
Coastal California gnatcatcher (*Polioptila californica californica*) [2]	Federal: Threatened State: SSC County: Group 1, South and North County Plan Covered
Yellow warbler (*Setophaga petechia*)[2]	State: SSC County: Group 2
Western bluebird (*Sialia mexicana*)[2]	County: Group 2, South County Plan Covered
Barn owl (*Tyto alba*)[2]	County: Group 2
Great blue heron (*Ardea herodias*)	County: Group 2
Vermillion flycatcher (*Pyrocephalus rubinus*)	State: SSC County: Group 1
Loggerhead shrike (*Lanius ludovicianus*)	State: SSC County: Group 1, North County Plan Covered
Grasshopper sparrow (*Ammodramus savannarum*)	County: Group 1, North County Plan (Indicator Species)
Tricolored blackbird (Agelaius tricolor)	Federal: BCC State: Threatened, SSC County: Group 1, South and North County Plan Covered
Mammals	
Pallid bat *(Antrozous pallidus)* [2]	State: SSC County: Group 2, North County Plan Covered
Dulzura pocket mouse *(Chaetodipus californicus femoralis)* [2]	County: Group 2
Northwestern San Diego pocket mouse *(Chaetodipus fallax fallax)* [2]	County: Group 2
Townsend's big-eared bat *(Corynorhinus townsendii)* [2]	State: CT, SSC County: Group 2, North County Plan Covered
Western mastiff bat (*Eumops perotis*) [2]	State: SSC County: Group 2
Western red bat *(Lasiurus blossevillii)* [2]	State: SSC County: Group 2
Western yellow bat *(Lasiurus xanthinus)* [2]	State: SSC
Western small-footed myotis *(Myotis ciliolabrum)* [2]	County: Group 2
Yuma myotis *(Myotis yumanensi)* [2]	County: Group 2
San Diego desert (Bryant's) woodrat *(Neotoma bryanti intermedia)*[2]	State: SSC County: Group 2
Pocketed free-tailed bat *(Nyctinomops femorosaccus)* [2]	State: SSC County: Group 2
Big free-tailed bat *(Nyctinomops macrotis)*[2]	State: SSC County: Group 2
Western long-eared myotis (*Myotis evotis*)	County: Group 2

Common (Scientific) Name	Sensitivity Status (Federal/State/County Covered)[1]
Stephens' kangaroo rat (*Dipodomys stephensi*)	Federal: Threatened State: Threatened County: Group 1, North County Plan Covered
Southern mule deer *(Odocoileus hemionus*) [2]	County: Group 2, South County Plan Covered. North County Plan (Indicator Species)
Mountain lion *(Puma concolor*) [2]	County: Group 2, South and North County Plan Covered

Table Notes:
1 **Status Legend**:
Federal Status Abbreviation: BCC: Bird of Conservation Concern, (USFWS, 2021)
State Status Abbreviations: CT: Candidate Threatened; FP: Fully Protected; SSC: Species of Special Concern; WL: Watch List
Local: MSCP Subarea Plan (South County Plan), Draft North County Plan (North County Plan)
2. Documented in the NW portion of the Preserve (**bold text**)
3. MSCP Narrow Endemic status for golden eagle applies to nesting.

Revised MND: The Revised Project has been designed to minimize impacts to special status wildlife species to the maximum extent practicable and project activities do not occur in areas of the Preserve designated by USFWS as critical habitat. The changes proposed by the Revised Project would not result in additional impacts or substantially increase the severity of impacts to sensitive wildlife species. Impacts from the Revised Project would be reduced to a less than significant level through the Adopted MND MMs and no new measures are required.

State Listed, Federally Listed and Fully Protected Species

Arroyo toad: The NW portion of the preserve contains USFWS arroyo toad critical habitat. Arroyo toads are present in Santa Maria Creek and upland aestivation habitat. The trail reroute location is sited outside of designated arroyo toad critical habitat, and outside of occupied or suitable habitat. While the reroute commences within 0.62 miles of wetlands (0.15-miles) of occupied stretches of Santa Maria Creek, topographically, the location is 770 feet in elevation above the stream channel, significantly greater than the 80 feet in elevation most often used by Wildlife Agencies and amphibian experts for an elevation threshold for habitat suitability (County of San Diego 2010). Therefore, the Revised Project will not result in impacts on arroyo toad.

Coastal California gnatcatcher: The Revised Project is not located in gnatcatcher critical habitat. The CSS habitat within the vicinity of Kearny Trail is occupied by gnatcatcher. Potential impacts on coastal California gnatcatcher from Kearny Trail maintenance would be avoided through seasonal restrictions on work during breeding season or pre-construction surveys and appropriate buffer establishment as well as the presence of a biological monitor during major maintenance activities to ensure avoidance of impacts in accordance with MM A-6, IM C.5.7 and RMP Management Directive A.4.

Stephen's kangaroo rat (SKR): SKR have not been documented in the NW portion of the Preserve. Grassland habitat does exist in a portion of the NW portion of the

Preserve; however, the trail reroute is located outside of suitable habitat in chaparral, oak woodland, and CSS communities.

San Diego fairy shrimp: San Diego fairy shrimp have not been documented in the NW portion of the preserve. The Revised Project's activities are located outside of occupied or suitable habitat.

Western spadefoot: Spadefoot have been documented in the NW portion of the Preserve in and near Santa Maria Creek. However, the drainages in the project area are ephemeral not wetland waters and there is a lack of standing water and suitable pools to support the species. The trail reroute is located outside of occupied or suitable habitat. Therefore, the Revised Project will not result in impacts to western spadefoot.

Tricolored blackbird: Tricolored blackbird has not been documented in the NW portion of the preserve. The Revised Project's activities are located outside of occupied or suitable habitat.

Golden eagle: DPR works to manage and conserve habitat for golden eagles at the Preserve through RMP and Targeted Monitoring Program implementation. Since 2013, DPR has conducted focused studies of eagle and other raptor behavior at the Preserve and monitored the success of the offsite golden eagle nest in Bandy Canyon. During the survey period, (2013-2016, 2018-2025) the Preserve has consistently supported one golden eagle territory (ESA 2024). The grassland habitats at the Preserve are known as preferred foraging habitat for golden eagles nesting offsite in Bandy Canyon.

The original MND for the Approved Project identified that there would be less than significant impacts to golden eagles. The evaluation was based on the consideration of activities associated with the multi-use trail system including year-round use of the Old Survey Road 97 trail in the NW portion of the Preserve as part of the Preserve's trail system. As discussed in detail in Section 1.2, the trail was removed from the year-round muti-use trail system in the Adopted MND and opened for seasonal use in 2018 following the 2018 MND Addendum.

The Revised Project proposes to reroute a section of the existing Old Survey Road 97 trail to a less sensitive area to further avoid and minimize impacts to the offsite Bandy Canyon golden eagle nest, thereby supporting the wildlife habitat, conservation and biological values of the property. The trail reroute includes closing 1.1 miles of the existing Old Survey Road 97 trail within the 4,000-ft nest avoidance area identified in the MSCP Subarea Plan. The closed section of trail would be rerouted and consistent with 2021 USFWS buffer recommendations, the 1.3-mile-long new trail alignment would be constructed in an area with no line-of-sight to the nest due to topography; which also provides an auditory barrier. Less than half a mile of the 1.3-mile long reroute alignment would be within one-mile of the nest.

The 1.3-mile reroute would then connect to an existing dirt trail (Kearny Trail). The reroute trail and connection to Kearny Trail is only accessible through the existing trailhead on Rangeland Road and the alignment would remain an out-and-back trail. While a future connection to the Coast to Crest Trail from Kearny Trail is envisioned, no connections to the Coast to Crest Trail system have been identified at this time. The Coast to Crest Trail proposed segment in San Pasqual Valley is under initial study by the San Dieguito River Park Joint Powers Authority and no specific plans have been made (SDJPA 2024). The rerouted trail alignment also does not include a charismatic feature (e.g., waterfall, unique rock formation) that would substantially increase the draw to this trail.

Through the ongoing Raptor Study, the data show persistent use of the grasslands by golden eagle for foraging and other behaviors (ESA 2024). These include areas where year-round human use occurs, such as the multi-use trail in the SW portion of the Preserve, NW and SE grasslands where ranchers have access for grazing management, areas under management for habitat restoration and invasive species control and where regular monitoring occurs. Additionally, documented use of the NW grasslands in the Preserve were highest in the fall, when the Old Survey Road 97 trail is open for public use.

DPR monitoring and maintenance activities in all quadrants of the Preserve include the use of trucks and side-by-side utility vehicles along with on-foot and bike patrols on established trails and access roads. Side-by-sides (SxS) (e.g., Gator, Ranger) and their uses are differentiated from recreational all-terrain vehicles (ATVs) and do not mimic recreational off-highway vehicle use. SxSs are used by DPR for specific land management-related tasks such as transporting biologists for monitoring or equipment and staff for trail maintenance. In addition, they are driven at lower speeds and have predicable driving patterns. In limited cases, a quad may be used for trail maintenance activities on narrow trails or for search and rescue. The Revised Project will not result in a substantial increase in the use of trucks or SxSs over the long term. In addition, the Raptor Study data show a continued use of all quadrants of the Preserve by golden eagles where this vehicle use occurs. Following closure of the 1.1-mile section of Old Survey Road 97 trail no vehicles will enter the 4,000-ft MSCP golden eagle nest avoidance buffer and within the 1-mile buffer, topography precludes line-of-sight to the golden eagle nest and provides an auditory buffer.

MM A-11 stipulates minimization and avoidance measures specific to golden eagle (see Table 2). MM A-11 (a) and (d) were previously completed with the closure of the southern spur of the Old Survey Road 97 trail in 2018-2019. A-11 (b) on-going monitoring and adaptive management of the Preserve initially supported the facilitation of docent led tours, but monitoring and adaptive management will continue to ensure no adverse impacts on golden eagle occur from the multi-use trail system. Consistent with

A-11 (f), 1.1 miles of the Old Survey Road 97 trail closest to the nest site will be abandoned and passive restoration will be implemented. Fencing and signage A-11 (e.) will be used to block the 1.1-mile closure area in addition to vertical mulch (see also IM B.1.1). Barriers and access will be monitored in accordance with IM C.2.2, and per A-11 (c) and IM C.3.3. DPR will monitor the number and types of trail users and identify peak usage times. The monitoring data will be used in adaptive management to determine if seasonal or other restrictions are required in the future. Trail use monitoring will include use of trail counters and camera traps in addition to DPR patrols. DPR will also continue the Raptor Study and offsite nest success monitoring. Lastly, DPR will develop educational and interpretive signage for use at the Preserve and revised website content to educate trail users on resource protection, the significance of golden eagles and overall biological and cultural value of the Preserve.

Therefore, MMs identified in the Adopted MND together with RMP IMs and project design measures would ensure that the potential impacts on golden eagle from the Revised Project are not substantially different and are consistent with the Adopted MND as amended. Impacts from the Revised Project would be reduced to a less than significant level through the Adopted MND MMs and no new measures are required.

Bald eagle: Bald eagles have been documented in all quadrants of the Preserve and on adjacent land. They have been shown through the Raptor Study to have high activity level on portions of the Preserve near Ramona Municipal Water District effluent ponds for foraging and have nested in the NE portion of the Preserve since 2021 (ESA, 2024). There are no additional impacts to bald eagle from the Revised Project and MMs identified in the Adopted MND along with RMP IMs would be sufficient to ensure potential impacts on bald eagle from the Revised Project are reduced to a less than significant level. Specifically, adherence to MM A-6 for raptor breeding season (January 15 to July 15) and IMs C.2.2, C.3.3 and C.5.2 which include Preserve monitoring of trail usage to determine if seasonal closures are necessary, ranger led education and interpretation, and signage and other access control will reduce potential impacts to a less than significant level.

Other Species of Concern (State and/or Federal), County Group 1 and 2, MSCP Subarea Plan and/or Draft North County Plan Covered Species

Raptors: In addition to golden and bald eagles discussed above, there is documented use of the Preserve for foraging and/or nesting by raptor species shown in Table 7 including northern harrier, Cooper's hawk and turkey vulture. Adherence to MM A-6 for raptor breeding season (January 15 to July 15) and IMs C.2.2, C.3.3 and C.5.2 which include monitoring trail usage in the Preserve to determine if seasonal closures are necessary, ranger led education and interpretation, and signage and other access control will reduce potential impacts to a less than significant level.

Other Sensitive Bird Species: Impacts to sensitive bird species (not specifically discussed above) from trail construction and maintenance activities will be avoided through breeding season restrictions (February 15-September 15). If activities must be conducted during the breeding season, MM A-6 will be followed, pre-construction surveys will be conducted by a qualified biologist, appropriate buffers placed around active nests and no activities will be allowed to occur within the buffers until the breeding season has ended or the nest is no longer active.

Other special status mammals and reptiles: Implementation of the trail reroute and trail maintenance as part of the Revised Project could result in ground disturbance and impacts on suitable occupied habitat for other special status reptile and mammal species not discussed above. Potential direct and indirect impacts to species will be avoided to the maximum extent practicable and habitat-based mitigation (discussed in Sensitive Habitats below) would benefit species and provide mitigation. Ground disturbing activities would occur in the fall and winter outside of breeding season. Wildlife movement across the trail corridor would not be restricted and trail use will be limited to Preserve hours typically 8am-sunset. Public access would largely avoid peak activity periods for crepuscular species and nocturnal species such as bats, Bryant's wood rat, San Diego pocket mouse and Dulzura pocket mouse and therefore not impact foraging activities. RMP IMs will be followed for access control and monitoring for off trail use. One Bryant's wood rat nest was documented in the project area near the Northern Drainage. Prior to construction the nest will be surveyed by a qualified biologist to determine activity, or it will be assumed active, and an appropriate buffer will be established around the nest to ensure avoidance.

The 1.1-mile trail closure would benefit special status species through a net increase in CSS and other native vegetation communities from the Revised Project. Additionally, specific measures implemented under the RMP focus on the preservation and long-term maintenance and management of the Preserve which would benefit special-status wildlife species and their habitats, contributing to their long-term survival.

Sensitive Habitats

Adopted MND: The analysis in the Adopted MND concluded that construction of the new trail segments associated with the muti-use trail system within the Preserve would result in direct impacts to sensitive native and naturalized habitats. The Adopted MND also addressed potential impacts to sensitive habitats from the future need to reroute trails. While specifically noted for erosion, the conclusion is applicable to reroutes implemented for other reasons. The Adopted MND concluded that future rerouting of a trail section could result in impacts on sensitive natural communities and offsite preservation at established ratios would reduce these impacts to a less-than-significant level.

Revised Project: The Revised Project has been designed to minimize impacts to sensitive vegetation communities and habitats to the maximum extent possible. While not mitigation, the closure and passive restoration of 1.1 miles of Old Survey Road 97 will benefit sensitive habitats and associated species. The passive restoration is projected to result in revegetation of 1.21 acres of native habitats including 0.56 acres of CSS and 0.26 acres of southern mixed chaparral.

The 1.3-mile trail reroute alignment was designed to occur in the least environmentally sensitive area feasible. Despite this, the trail construction will impact the sensitive habitats and associated acreages shown in Table 8. The increased impacts in acreage to these sensitive natural communities do not represent a substantial increase in the severity of the effects that changes the findings of the Adopted MND or requires new mitigation. By following MM A-8 in the Adopted MND, the impacts to sensitive vegetation communities would be reduced to a less than significant level through offsite habitat preservation or in accordance with County policy I-138. It should be noted that the deed restrictions on parcels purchased by the County known as 'Gildred Ranch' do not allow for mitigation within these parcels. However, preserve acquisitions completed in 2019, 2020, 2022 are not encumbered by deed restrictions or a conservation easement. Therefore, impacts on CSS habitat will be mitigated with conservation of CSS within the non-restricted County properties that are part of the Preserve.

Kearny Trail is an existing disturbed trail and only maintenance activities (vegetation trimming and erosion control) will be conducted. Should more substantial maintenance activities be required, impacts to sensitive habitats will be mitigated in accordance with MM A-8.

Table 8 Sensitive Vegetation Community Mitigation per MM A-8 for the Revised Project Activities

Vegetation Community	Holland Code	MSCP Tier	Impact Acreage (MSCP Subarea)	Impact Acreage (Draft NC Plan Area)	Total Impact Acreage	Mitigation Ratio[1,2]	Required Mitigation (Acres)
Sensitive Vegetation Communities							
Dense Coast Live Oak Woodland	71162	I	0.02	-	0.02	2:1	0.04
Coastal Sage-Chaparral Scrub	37G00	II	0.26	0.20	0.46	1.5:1	0.69
Diegan Coastal Sage Scrub	32500	II	0.25	0.07	0.32	1.5:1	0.49
Scrub Oak Chaparral	37900	III	-	0.09	0.09	1:1	0.09
Total			**0.57**	**0.36**	**0.89**		**1.31**
Other							
Disturbed Habitat (Road)	11300	IV	0.04	-	0.04	None	-

Notes:

1. The Preserve is a biological resource core area (BRCA) and the ratio shown is based on mitigation occurring on land that meets the criteria for a BRCA.

2. Should the North County Plan become adopted prior to the implementation of construction in the portion of the Preserve within the North County Plan area, the mitigation ratios may change in accordance with the plan.

Wetlands

Adopted MND: Three drainage features associated with Old Survey Road 97 were determined to be non-wetland waters regulated by CDFW, United States Army Corps of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB). Drainages 1 and 2 cross under the Old Survey Road 97 trail in existing culverts. The Drainage 3 channel supports a mesic vegetation community providing evidence of intermittent water flow. Maintenance of the existing road was identified to impact 18 square feet of the drainage. However, the potential impacts were smaller than standard mapping units and no mitigation was proposed.

Building out other portions of the multi-use trail system were determined to have the potential to result in impacts to jurisdictional waters. These impacts would be reduced to less-than-significant levels through (1) acquisition of permits, (2) preservation of remaining portions of Santa Maria Creek, and (3) offsite-restoration and/or enhancement; details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) would be finalized as part of the permitting process with USACE, CDFW, and the RWQCB.

Revised Project: The rerouted trail alignment has been designed to avoid and minimize impacts on jurisdictional wetlands/waters and associated buffers. There are no proposed modifications to the three existing drainages along Old Survey Road 97 addressed in the Adopted MND. These drainages occur along the section of the existing Old Survey Road 97 trail that will remain open. The rerouted trail alignment will follow topographic contours to the northwest of Drainage 3. No new direct or indirect impacts to the drainage will occur as a result of the Revised Project. The rerouted trail alignment is predominately more than 100 feet and at all times greater than 50 feet from the drainage.

The rerouted trail alignment will require crossing a Northern Drainage that was not analyzed in the Adopted MND. An aquatic resource survey was conducted for this resource and was determined to be an ephemeral non-wetland water of the state subject to CDFW and RWQCB jurisdiction. The narrow corridor of oak woodland surrounding the drainage is also subject to CDFW jurisdiction. A 4-ft unimproved dry weather crossing is proposed that would result in impacts to 24 square feet of State jurisdictional resources. Consistent with the Adopted MND, jurisdictional impacts from muti-use trail construction would be reduced to a less than significant level through MM A-9 (acquisition of permits and any required restoration and enhancement finalized through the permitting process).

3.5. Cultural Resources

The Adopted MND for the Approved Project identified significant effects on cultural resources that would be reduced to less than significant through mitigation. Impacts to cultural resources from the Revised Project would be similar to those analyzed in the Adopted MND for the Approved Project, specifically the multi-use trail system. MMs identified in the Adopted MND together with RMP IMs and project design measures would ensure that the severity of impacts to cultural resources from the Revised Project are not substantially different and are consistent with the Adopted MND. Impacts from the Revised Project would be reduced to a less than significant through mitigation.

The Revised Project proposes to close 1.1 miles of the existing Old Survey Road 97 trail (P-37-040845). To avoid impacts, in accordance with MM B-2, passive restoration will be used. Wood fencing will be installed to formally close the trail. Access control signage will also be installed and vertical mulch placed behind the fence to further conceal the trail and deter unauthorized access. Qualified archeological and Native American monitors will be present during the fence and signage installation in accordance with MM B-3 and IM E.5.1.

The 1.3-mile rerouted trail alignment proposed as part of the Revised Project has been designed to avoid known cultural resources. In accordance with MM B-3, qualified archeological and Native American monitors will be present during ground disturbing activities associated with construction of the routed alignment. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until the qualified archaeologist can evaluate the find and make appropriate recommendations for treatment. All sites will be recorded in accordance with IMs E.1.1 and E.5.1.

The existing Kearny Trail (record ID pending) was evaluated in previous assessments for the Preserve through its association with Old Survey Road 97. It is an assumed significant cultural resource. Prior to maintenance activities and opening Kearny Trail to public use, a data recovery and mitigation plan will be developed in accordance with IM E.2.2 and in conjunction with MM B-1.

Any ground-disturbing activities on the Preserve as part of the Revised Project will be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to CEQA Guidelines Section 15064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance. In the event human remains or suspect human remains are found, the procedures and protocols as outlined in MM B-4 will be followed.

The Revised Project proposes to include interpretive educational elements such as signage that does not disclose sensitive information but highlights the Native American history associated with the Preserve as well as cultural resource awareness and sensitivity.

3.6. Geology and Soils

The Adopted MND for the Approved Project identified that there would be less than significant impacts to geology and soils. The Revised Project would not result in additional impacts on geology and soils beyond those identified in the Adopted MND.

3.7. Greenhouse Gas Emissions

The Adopted MND for the Approved Project identified that there would be less than significant impacts to greenhouse gas emissions. The analysis was based on the consideration of project activities including those associated with the multi-use trail system and year-round use of the Old Survey Road 97 trail. The Revised Project would not result in a significant increase in greenhouse gas emissions or related impacts to global climate or conflict with applicable climate change plans, policies, or regulations.

3.8. Hazards and Hazardous Materials

The Adopted MND for the Approved Project identified that there would be less than significant impacts related to hazards and hazardous materials. Year-round use and construction activities associated with multi-use trail improvements were included in the evaluation. The Revised Project would still be required to comply with mandated regulations applicable to the Original Project for hazards and hazardous materials. Given the similarity in construction activities and maintenance requirements, the Revised Project would not result in new or greater impacts beyond those identified in the Adopted MND.

3.9. Hydrology and Water Quality

The Adopted MND for the Approved Project identified that there would be less than significant impacts to hydrology and water quality. The Revised Project would still be required to comply with all applicable water quality regulations during and following construction activities. The Revised Project would not result in additional impacts on hydrology and water quality beyond those identified in the Adopted MND.

3.10. Land Use and Planning

The Adopted MND for the Approved Project identified that there would be less than significant impacts to land use and planning. The Revised Project would not result in

additional impacts to land use and planning beyond those identified in the Adopted MND.

3.11. Mineral Resources

The Adopted MND for the Approved Project identified that there would be less than significant impacts on mineral resources. The Revised Project would not result in additional impacts on mineral resources beyond those identified in the Adopted MND.

3.12. Noise

The Adopted MND for the Approved Project identified that there would be less than significant impacts to noise. The evaluation was based on the consideration of activities including the year-round multi-use of the Old Survey Road 97 trail in the NW portion of the Preserve. Trail construction and grading were also analyzed. Construction of the reroute will produce noise on a temporary basis and will not exceed allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards. The Revised Project would not result in additional impacts on noise beyond those identified in the Adopted MND.

3.13. Population and Housing

The Adopted MND for the Approved Project identified that there would be less than significant impacts to population and housing. The Revised Project would not result in additional impacts on population and housing beyond those identified in the Adopted MND.

3.14. Public Services

The Adopted MND for the Approved Project did not identify any potentially significant impacts to public services. The Revised Project would not result in operational changes to the project beyond those evaluated in the MND for the Approved Project. It would also not result in adverse physical effects on the environment through project design and biological and cultural mitigation measures discussed in Section 2.0 and Section 3.5 above. Therefore, the Revised Project would not result in additional impacts on public services beyond those identified in the Adopted MND.

3.15. Recreation

The Adopted MND for the Approved Project identified that there would be less than significant impacts to parkland and recreational facilities. The evaluation was based on the consideration of activities associated with the multi-use trail system, including year-round use of the Old Survey Road 97 trail in the NW portion of the Preserve. The

Revised Project would not result in additional impacts on recreation beyond those identified in the Adopted MND.

3.16. Transportation/Traffic

The Adopted MND for the Approved Project identified that there would be less than significant impacts to transportation and traffic. The evaluation was based on the consideration of activities associated with the multi-use trail system including year-round use of the Old Survey Road 97 trail in the NW portion of the Preserve in the Preserve's trail system. The Revised Project would not result in additional impacts on transportation and traffic beyond those identified in the Adopted MND.

3.17. Utilities and Service Systems

The Adopted MND for the Approved Project identified that there would be less than significant impacts to public utilities and service systems. The Revised Project would not increase demand or effects on utility and service systems from what was analyzed in the Adopted MND.

3.18. Mandatory Findings of Significance

As demonstrated in the environmental analysis in Section 3.0, the changes to the approved project analyzed in the Adopted MND would not result in new significant impacts or substantially increase the severity of significant impacts previously identified in the Adopted MND. Additionally, the mitigation measures set forth in the Adopted MND are still applicable, and no new mitigation measures are required to mitigate the changes to the approved project. Therefore, the County of San Diego, as the Lead Agency, has determined that, consistent with the CEQA Guidelines Section 15162, an Addendum to the MND is sufficient and appropriate. Public review of this Addendum is not required per the CEQA Guidelines Section 15164.

4.0 References

County of San Diego, 2009. *Community Trails Master Plan*. Original 2005, revised in 2009.

County of San Diego, 2010. *Guidelines for Determining Significance Biological Resources.* Revised September 15, 2010.

County of San Diego, Department of Parks and Recreation (DPR), 2013. *Ramona Grasslands Preserve Resource Management Plan*. Prepared by ICF. February 2013.

DPR 2013. *Adopted Mitigated Negative Declaration for the Ramona Grasslands Preserve Project*. August 2013.

DPR 2018. *Addendum to the Ramona Grasslands Preserve Project Mitigated Negative Declaration.* May 2018.

DPR 2025. *Resource Assessment for the Old Survey Roud 97 Reroute*. September 2025.

California Department of Fish and Wildlife (CDFW) 2018. Unpublished letter to Supervisor Dianne Jacob regarding public use at Ramona Grasslands Preserve. August 2018.

Environmental Science Associates (ESA), 2024. *Ramona Grasslands Preserve Raptor Surveys Monitoring Report 2023-2024*. Prepared for the County of San Diego Department of Parks and Recreation. November 2024. Available at: https://www.sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/management-documents/ramona-grasslands/raptor-monitoring-results/Ramona_RaptorAnnualReport_2023-24_Final_Website.pdf

United States Fish and Wildlife Service (USFWS), 2021. *Recommended Buffer Zones for Ground-based Human Activities Around Nesting Sites of Golden Eagles in California and Nevada*. USFWS California Great Basin Region Migratory Birds Program. May 2021.

Attachment 1 - Adopted MND

August 7, 2013

ADOPT MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT (DISTRICT: 2)

County of San Diego

Department of Parks and Recreation

5500 Overland Ave., Suite 410

San Diego, CA 92123

PARKS AND RECREATION
COUNTY OF SAN DIEGO

COUNTY OF SAN DIEGO

LAND USE AGENDA ITEM

BOARD OF SUPERVISORS

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Fifth District

DATE: August 7, 2013 **03**

TO: Board of Supervisors

SUBJECT: ADOPT MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT (DISTRICT: 2)

Overview

The Ramona Grasslands Preserve Project will create a 5.5-mile multi-use trail system that will connect to an existing 3.8 miles of trail within the Ramona Grasslands Preserve, providing the public with access to a total trail system of 9.3 miles. The proposed project also includes the construction of a crossing of Santa Maria Creek, a small staging area, and supporting infrastructure including a maintenance building, viewing pavilion/visitor kiosk and two volunteer pads. The project will implement the management directives identified in the Ramona Grasslands Preserve Resource Management Plan and will be constructed in phases. The project at Ramona Grasslands Preserve is located primarily just west of the Ramona Airport and east and north of Highland Valley Road in the unincorporated community of Ramona (2010 Thomas Guide pages 1152, B-5; 1151, G-4, G-7, and J7).

Today's requested action is to adopt the Mitigated Negative Declaration and the Mitigation Monitoring and Reporting Program for the Ramona Grasslands Preserve Project.

Recommendation(s)

CHIEF ADMINISTRATIVE OFFICER

1. Find, on the basis of the whole record, that there is no substantial evidence that the project will have a significant effect on the environment. Consider the Mitigated Negative Declaration dated February 4, 2013, together with the comments received during public review, and adopt it, finding that it reflects the independent judgment and analysis of the Board of Supervisors.

2. Adopt the Mitigation Monitoring and Reporting Program for the project and direct the Director, Department of Parks and Recreation, to implement the mitigation measures identified.

Fiscal Impact

There is no fiscal impact associated with today's requested action to adopt the Mitigated Negative Declaration. A full fiscal impact statement will be included when this item is brought before the Board at a later date for approval to advertise and award a construction contract.

SUBJECT: ADOPT MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT (DISTRICT: 2)

Business Impact Statement
N/A

Advisory Board Statement
The Ramona Grasslands Preserve Project incorporates trails and pathways included in the Ramona Community Trails and Pathway Plan approved by the Ramona Planning Group on September 4, 2008.

Background
The Ramona Grasslands Preserve (Preserve) consists of approximately 3,490 acres located within the unincorporated community of Ramona. The Preserve, which includes a significant portion of the remaining undeveloped portion of the Santa Maria Creek watershed, supports a mosaic of habitat types such as coastal sage scrub, chaparral, oak woodlands and vernal pools. Many rare animals make their home in this area, including Stephen's kangaroo rat and fairy shrimp. The southwest portion of the Preserve currently has a staging area and a 3.8-mile non-motorized multi-use trail system that is open to the public.

The Ramona Grasslands Preserve Project proposes the addition of a 5.5-mile multi-use trail system for hiking, biking, and equestrian users, a crossing of Santa Maria Creek, a staging area up to three acres in size, a maintenance building, viewing pavilion/visitor kiosk and two volunteer pads. The proposed trail system utilizes existing ranch roads and trails to the greatest possible extent, with construction of approximately 1.2 miles of new trail and a new crossing of Santa Maria Creek. The trail system will connect to 3.8 miles of the recently constructed Oak Country II Trails, forming a total trail system of 9.3 miles. Approximately 2.1 miles of pathways are also proposed within the road right of way to increase connectivity between trail systems.

Trail and infrastructure construction and recreational use within the Preserve is proposed in three phases:

- Phase I will include the establishment of 2.8 miles of existing trails and construction of a staging area and associated infrastructure (maintenance building, viewing pavilion/visitor kiosk, and 2 volunteer pads) in the northeast portion of the Preserve. Funding will be sought for Phase I during FY 2013-14. If funding is secured, construction could be expected to occur in the fall of 2014.
- Phase II will involve connecting the existing Oak Country II Trail system to Phase I. This will include the establishment of 1.5 miles of existing trail, construction of 0.8 miles of new trail with a crossing of Santa Maria Creek within the northwest portion of the Preserve, construction of a 0.7-mile pathway on the west side of Rangeland Road, and installation of road crossing signage and construction of 0.4 miles of new trail within a public access easement on Ramona Municipal Water District property located east of Rangeland Road. Phase II proposes a total of 2.7 miles of trail and 0.7 miles of pathway. It is not expected that Phase II will be pursued until Phase I has been completed, monitored and adaptively managed to ensure public use of the Preserve is consistent with the intent of existing deed restrictions and conservation easements.
- Phase III, if feasible, will construct 1.3 miles of pathway along the southern portion of

Rangeland Road and along Highland Valley Road, ultimately connecting the northwest and northeast portions of the Preserve to the existing Oak Country II staging area. Phase III is considered a future phase as it will likely involve relocation of utilities within the road right of way.

The proposed project is consistent with the South County Multiple Species Conservation Program (MSCP) Subarea Plan, draft North County Plan, and the deed restrictions and conservation easements associated with the federal and state grants used to acquire the Preserve.

A Resource Management Plan (RMP) has been prepared for the Preserve. The RMP establishes baseline conditions, guides the management and monitoring of onsite biological and cultural resources to protect their values, guides vegetation management, serves as a guide for appropriate onsite public uses, and provides an overview of the operation and maintenance requirements to implement management goals.

Environmental Statement

The Mitigated Negative Declaration (MND) prepared for this project (Attachment B) identified significant impacts to biological and cultural resources. The MND includes mitigation measures that reduce each of these impacts to below a level of significance. With the implementation of the mitigation measures, the proposed project will not cause any significant environmental impacts. The MND was circulated for public review from November 17, 2011 through January 17, 2012, and 64 comment letters were received. The public comments and staff responses to each comment are included in Attachment D.

Changes were made to the project description in response to comments by the Wildlife Agencies, including the following: the proposed north/south trail in the northwest portion of the Preserve was removed from the planned trail system, with the exception that the trail can be opened for docent-led tours at appropriate times of the year; phasing development of the trail system was added; the proposed staging area has been clarified to be "up to a maximum" of three acres; proposed staging area parking spaces for vehicles and vehicles with horse trailers have been reduced; proposed amenities in the northeast portion, including a ranger station/interpretive center/restroom facility, primitive amphitheatre, picnic areas, and horse arena, were removed from the project; and the proposed alternative trail segment, which was designed to avoid an eroded section of trail and proximity of the trail to perched raptors in the northeast portion of the Preserve, has been removed and the original proposed trail segment has been added back.

Changes were made to the MND in response to comments by the Wildlife Agencies, including the following: clarification of when construction can occur within arroyo toad breeding habitat; clarification of the number of arroyo toad surveys conducted before construction can begin; Resource Management Plan (RMP) implementation measures for Stephens' kangaroo rats were included; and avoidance and minimization measures for golden eagles from the RMP were included. Minor edits were made to the project impacts and proposed mitigation in response to changes made to the proposed trail system. These changes do not require recirculation of the MND.

The documents and other material that constitute the record of proceedings on which the decision

is based are available for public viewing at the Department of Parks and Recreation located at 5500 Overland Avenue, Suite 410, San Diego, California 92123 and the Clerk of the Board of Supervisors located at 1600 Pacific Highway, Room 402, San Diego, California. The custodian of the documents is the Clerk of the Board of Supervisors and the Department of Parks and Recreation.

Linkage to the County of San Diego Strategic Plan
Today's proposed action to adopt the Mitigated Negative Declaration for the Ramona Grasslands Preserve Project supports the Sustainable Environments and Healthy Families Strategic Initiatives in the County of San Diego's 2013-2018 Strategic Plan by promoting natural resource management strategies that ensure environmental preservation, and providing park amenities that improve and enrich our residents' quality of life.

Respectfully submitted,

Sarah Aghassi

SARAH E. AGHASSI
Deputy Chief Administrative Officer

SUBJECT: ADOPT MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT (DISTRICT: 2)

ATTACHMENT(S)
Attachment A: Ramona Grasslands Trails Plan Map
Attachment B: Mitigated Negative Declaration dated February 4, 2013
Attachment C: CEQA Initial Study – Environmental Checklist dated February 4, 2013
Attachment D: Public Comments and Response
Attachment E: Mitigation Monitoring and Reporting Program

SUBJECT: ADOPT MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT (DISTRICT: 2)

AGENDA ITEM INFORMATION SHEET

REQUIRES FOUR VOTES: [ ] Yes [X] No

WRITTEN DISCLOSURE PER COUNTY CHARTER SECTION 1000.1 REQUIRED
[ ] Yes [X] No

PREVIOUS RELEVANT BOARD ACTIONS: N/A

BOARD POLICIES APPLICABLE: N/A

BOARD POLICY STATEMENTS: N/A

MANDATORY COMPLIANCE: N/A

ORACLE AWARD NUMBER(S) AND CONTRACT AND/OR REQUISITION NUMBER(S): N/A

ORIGINATING DEPARTMENT: Parks and Recreation

OTHER CONCURRENCES(S): N/A

CONTACT PERSON(S):

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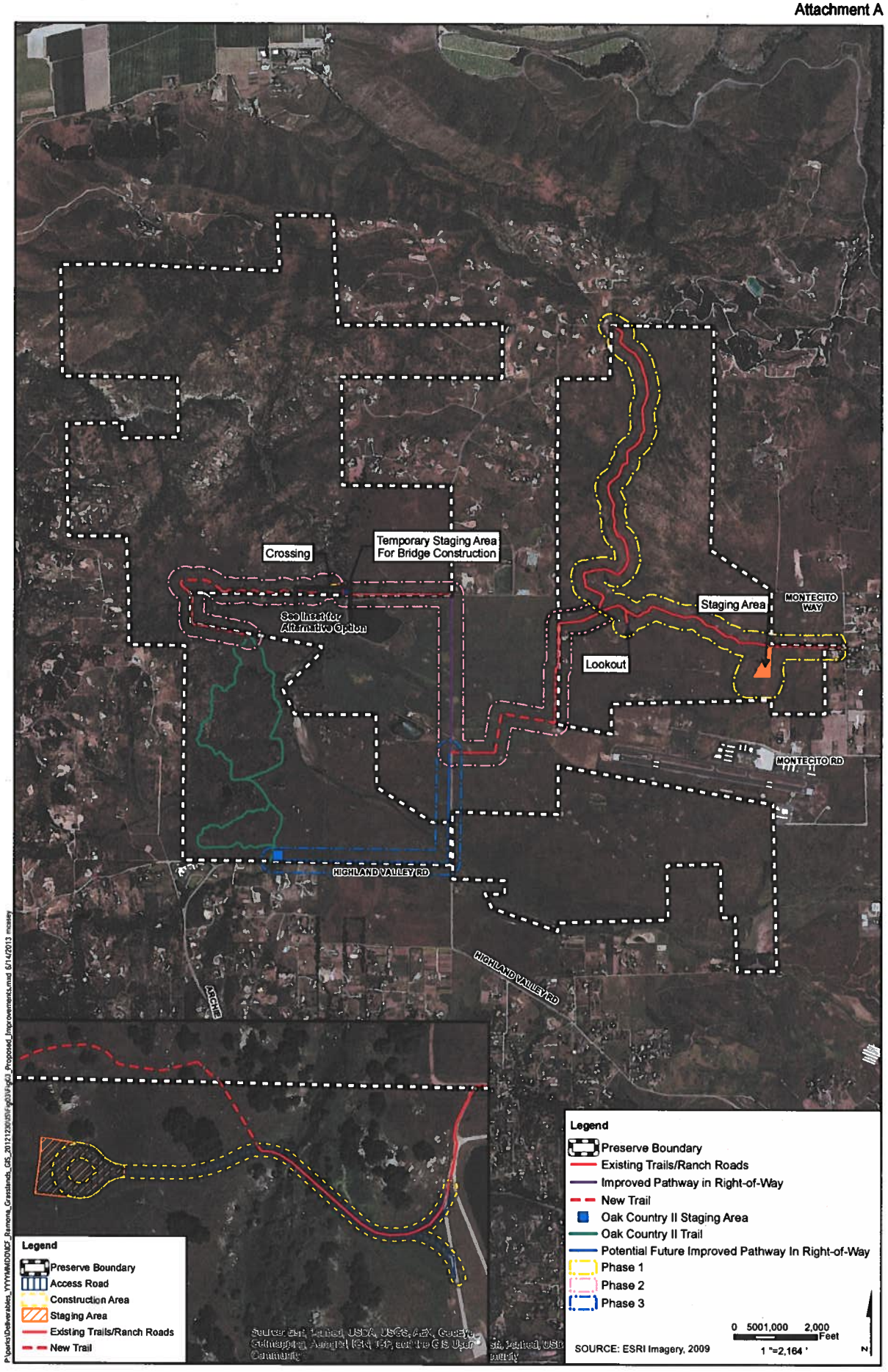


Figure 3
Revised Proposed Trails and Infrastructure Improvements
Initial Study for the Ramona Grasslands Preserve Project

County of San Diego

BRIAN ALBRIGHT
DIRECTOR

DEPARTMENT OF PARKS AND RECREATION
Administrative Office: (858) 694-3030
Fax: (858) 495-5841
Reservations: (858) 565-3600

MITIGATED NEGATIVE DECLARATION

~~November 8, 2011~~Revised February 4, 2013
Project Name: Ramona Grasslands Preserve

This Document is Considered Draft Until it Is Adopted by the Appropriate County of San Diego Decision-Making Body

This Mitigated Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

a. Initial Study Form
b. Environmental Analysis Form and attached extended studies for Biological Resources (including a Jurisdictional Delineation Report) and Cultural Resources
c. Attached Resources Management Plan and Vegetation Management Plan

1. California Environmental Quality Act Mitigated Negative Declaration Findings:

   Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

   Refer to the attached Environmental Initial Study for the rationale requiring the following measures:

   A. Biological Resources

   1. In order to avoid potential impacts on federally and/or state-listed plant species, the following measures shall be implemented:
      a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by listed plant species to ensure avoidance.
      b. Focused surveys for listed plant species shall be conducted within the offsite east–west trail easement that connects the eastern and western portions of the Preserve and within the vicinity of the proposed new offsite trail segment on the Ramona Municipal Water District (RMWD) property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trail in these offsite locations shall avoid impacts on listed plant species.

   2. In order to avoid potential impacts on County List A and/or B plant species, the following measures shall be implemented:
      a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by County List A and B plant species to ensure impacts are avoided or minimized to the extent feasible.
      b. Focused surveys for County List A and B plant species shall be conducted within the offsite east–west trail easement that connects the eastern and western portions of the Preserve, and within the vicinity of the proposed offsite trail segment on the RMWD property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trails in these offsite locations shall avoid impacts on County List A and B plant species to the maximum extent feasible.

   3. During construction of all proposed new trail segments in the vicinity of suitable/occupied arroyo toad habitat in the NW portion of the Preserve (unless deemed unsuitable for toad), including the crossing (bridge or dry weather crossing) of Santa Maria Creek arroyo toad avoidance and minimization measures will be implemented. Measures will be finalized during consultation under the Federal Endangered Species Act, but could include the following:

a. ~~No c~~Construction within ~~activities would take place during the~~ arroyo toad breeding habitat will take place outside of the arroyo toad breeding season (defined as March 15 through July 31). Construction within arroyo toad upland aestivation habitat will take place during the ~~within suitable~~ arroyo toad breeding season (defined as March 15 through July 31)~~habitat~~.

b. Access to the project sites ~~should~~will be via existing access routes to the greatest extent possible. Project-related vehicle travel would be limited to daylight hours as arroyo toads use roadways primarily during nighttime hours

c. Activities that attract small insects (e.g., ants) and toad predators should be minimized by keeping the project sites as clean as possible. All food-related trash should be placed in sealed bins or regularly removed from the site

d. Dust control (i.e., water truck spraying) should be performed in a manner that does not attract toads into the action area and by performing when the toad exclusion fence is up and minimizing overspray.

e. Arroyo toad exclusion fencing would be installed around the perimeter of all work areas within suitable arroyo toad upland habitat prior to construction. The purpose of the fence is to exclude arroyo toads from the work sites. Such fencing would consist of fabric or plastic as least two feet high, staked firmly to the ground with the lower one foot of material stretching outward along the ground and secured with a continuous line of gravel bags. No digging or vegetation removal will be associated with the installation of this fence and all fencing materials (i.e., mesh, stakes, etc.) would be removed following construction within the work area. Ingress and egress of equipment and personnel will use a single access point to the site. This access point will be as narrow as possible and will be closed off by exclusionary fencing when personnel are not on the project site.

f. Within the week prior to commencement of construction activities, but after exclusionary fencing has been installed, at least ~~two~~ three surveys for arroyo toads ~~would~~ will be conducted on consecutive nights within the fenced areas by a USFWS-approved biologist. Surveys would be conducted during appropriate climatic conditions and during the appropriate time of day or night to maximize the likelihood of encountering toads. If climatic conditions are not appropriate for arroyo toad movement during the surveys, a qualified biologist may attempt to illicit a response from the arroyo toads (during the night [i.e., at least 1

hour after sunset] with temperatures above 50 degrees Fahrenheit), by spraying the project area with water to simulate a rain event. If arroyo toads were found within the project area they would be captured and translocated, by the biologist, to the closest area of suitable habitat along Santa Maria Creek. The biologist would coordinate with the County and the USFWS to determine a specific translocation site prior to moving any arroyo toads. The date, time of capture, specific location of capture (using GPS), approximate size, age, and health of the individual would be recorded and provided to the USFWS within 2 weeks of the translocation in both hard copy and digital format.

g. Excavations will be properly covered to prevent toads from entering any open pits.

h. The USFWS-approved biologist would be on call and available as needed at other times in the event that a toad was encountered during the activities. The USFWS-approved biologist would be present on site full-time, for 2-3 days, following any measurable rainfall.

i. If, during project implementation there is a toad sighting, the USFWS-approved biologist will halt work and contact the County. The County would contact the USFWS directly. Any type of "take" of toads, which includes digging up, handling (i.e., relocating the toad), injury, or death would be reported immediately to the USFWS.

j. If determined to be necessary, a biological monitor shall be present during major trail maintenance within suitable/occupied arroyo toad habitat to ensure potential impacts are avoided to the extent feasible.

4. In order to avoid potential impacts on Stephens' kangaroo rats (SKR), the following measures shall be implemented:

   a. Prior to initiating any construction work at the staging area, SKR exclusionary fencing shall be installed.

   b. Once fencing is installed, focused surveys for SKR will be conducted prior to construction of the staging area.

   c. In order to render the staging area unsuitable for SKR (i.e., minimize the risk of attracting additional SKR into the staging area impact area), the County will first initiate the import and placement of 10 to15 cm (4 to 6 in) of decomposed granite (DG) on the driving and parking surfaces.

   d. If SKR are found, prior to importing and placing the DG, a qualified SKR biologist will complete 3 nights of exclusion trapping at least 24 hours, and no more than 72 hours, in advance of the ground disturbing

activity. All traps will be placed within the staging area. Prior to the first night of trapping, and each subsequent night of trapping, the entrances to all potential SKR burrows within the staging area will be cleared of debris and brushed to clear away all signs of activity. All burrows will be checked in the morning following trapping to determine if there was SKR activity at the burrow during the trapping session. Following the final night of trapping, the number of burrows showing SKR activity will be quantified and reported to the USFWS's Carlsbad Fish and Wildlife Office and California Department of Fish and Game (CDFG). SKR that are trapped are expected to be held for a period of no more than 72 hours, until the import and placement of DG within the staging area is initiated. SKR procurement and holding conditions will follow the 2007 "Guidelines of the American Society of Mammalogists for the Use of Wild Mammals in Research" (Gannon et al. 2007). Animals will be kept in solitary enclosures while in captivity to reduce the potential for injury or disease transmission and will be released into the SKR management area at Oak Country, the emergency access mowed area or other location determined in consultation with the USFWS Carlsbad Fish and Wildlife Office and the CDFG. The release will be into artificial burrows as designed and previously approved for Oak Country.

e. Prior to importing and placing DG, the qualified SKR biologist will determine the status of burrows within the staging area, if any, and if it is practicable to avoid, will flag any potential SKR burrows and create a 3 to 4.5-meter (m) [10 to 15-foot (ft)] buffer around the burrow to encompass the entire underground portion of the burrow complex. All areas to be avoided will be clearly marked on project maps and provided to the contractor. The qualified SKR biologist will be on site daily while construction and/or surface disturbing activities are taking place to ensure compliance with these avoidance and minimization measures.

~~a.~~ f. A biological monitor shall be present during all trail and staging area construction and major trail/staging area maintenance within suitable/occupied SKR habitat to ensure avoidance of occupied burrows.

~~b.~~ g. Prior to conducting trail/staging area maintenance activities in areas known to support SKR, a qualified biologist shall mark all occupied or potentially occupied burrows. Marked burrows shall be avoided by a distance of no less than a 10-15-foot buffer around the burrow to encompass the entire underground portion of the burrow complex~~5 feet when using mechanical equipment~~.

~~c.~~ h. Trail maintenance will not create berms 5 inches or higher.

~~d.~~ i. Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic.

5. A pre-construction burrowing owl survey to identify any active burrows shall be conducted within the vicinity of the offsite east–west trail easement that connects the eastern and western portions of the Preserve and within the vicinity of the offsite trail segment on RMWD property if the alternative Santa Maria Creek crossing is utilized. Pre-construction surveys must be completed no more than 30 days before initial brushing, clearing, grubbing, or grading of this new trail section. The final trail alignment in this location shall avoid impacts on occupied burrows and, if occupied burrows are found within 300-feet of the proposed trail, trail construction shall occur outside of the breeding season for this species (i.e., September 1 to January 31).

6. Vegetation clearing or grading shall be restricted during the breeding season for migratory birds (approximately January 15 through September 15 annually) unless pre-construction surveys by a qualified biologist determine no nesting birds protected by the MBTA are located within grading/vegetation clearing areas. If active nests are identified within the impact area on site, vegetation clearing activities shall not occur within 300 feet of active migrant songbird nests, 500 feet of active tree nesting raptor nests, 300 feet of active burrowing owl burrows, and 800 feet of other ground-nesting raptor nests until either the breeding season has ended or the nest is no longer active.

7. The final alignment and design of the southern section of the pathway along Rangeland Road and the pathway along Highland Valley Road will avoid impacts on sensitive natural communities/riparian habitat to the maximum extent feasible. Where unavoidable impacts are proposed, they will be quantified and mitigated at established mitigation ratios (e.g., in accordance with ratios outlined in the County's adopted MSCP or, when adopted, the North County ~~MSCP~~Plan; See tables 1 and 2 below).

8. Significant impacts on sensitive natural communities resulting from unavoidable impacts will be offset by the offsite preservation of habitat, the purchase of mitigation credits within an approved mitigation bank, or in accordance with County Board Policy I-138 at established mitigation ratios (e.g., in accordance with ratios outlined in the county's adopted MSCP or, when adopted, the North County ~~MSCP~~Plan; See tables 1 and 2 below).

9. Prior to impacting regulated waters, including wetlands, the following permits/approval would be required to be obtained: (1) USACE, CWA, Section 404 permit for placement of dredged or fill material within waters of the U.S.; (2) RWQCB, CWA, Section 401 State water quality

certification/waiver for an action that may result in degradation of waters of the State; (3) CDFG Streambed Alteration Agreement. If a span bridge is constructed for the proposed crossing of Santa Maria Creek (or if the alternative crossing of Santa Maria Creek on the RMWD property is utilized), impacts would be avoided and no mitigation would be required. While the construction of a trail/dry weather crossing of Santa Maria Creek would result in impacts; wetland creation is not proposed. The impact area, and immediately adjacent areas, is currently unvegetated and after project implementation, would continue to convey water. Mitigation for impacts on jurisdictional wetlands (disturbed wetland and non-vegetated channel) and non-wetland waters is proposed to consist of offsite restoration and/or enhancement. The details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB.

10. The final alignment and design of the southern section of the pathway along Rangeland Road and the pathway along Highland Valley Road will avoid impacts on jurisdictional wetlands and waters. Where unavoidable impacts are proposed, a formal wetland delineation will be conducted of the impact area, the impacts will be quantified, and impacts will be mitigated. Mitigation for impacts on jurisdictional wetlands (disturbed wetland and non-vegetated channel) and non-wetland waters is proposed to consist of offsite restoration and/or enhancement. The details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB.

11. The following avoidance and minimization measures for golden eagle shall be implemented:

    a. Closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known nesting location.

    b. On-going monitoring and adaptive management of the Preserve to facilitate docent led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known offsite nest locations to determine occupancy during the breeding period (December through June).

    c. DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts on golden eagles.

d. Planting of cactus thickets along the portion of the trail within the NW portion of the Preserve closest to the known off-site golden eagle nesting location to deter off-trail use.

e. Installation of fencing, signage or other barriers to avoid off-trail disturbance to known breeding locations, foraging habitat, and preferred perch spots.

f. Development and implementation of passive and/or active restoration of abandoned trails and other areas that may encourage off-trail activities.

g. Continued maintenance to control the spread of invasive exotic plant species within the Preserve.

Table 1. Habitat/Vegetation Communities Impacts and Proposed Mitigation (Proposed Creek Crossing)

Vegetation Community/Land Cover Type	Impact Acreage	Mitigation Ratio[1]	Required Mitigation Acreage	Acres Preserved[2]
Scrub and Chaparral				
Diegan Coastal Sage Scrub	–	–	–	151.02
Disturbed Diegan Coastal Sage Scrub	0.13–	2:1–	0.26–	47.8497
Coastal Sage-Chaparral Scrub	0.03–	2:1–	0.06–	201.3134
Southern Mixed Chaparral	0.11	0.5:1	0.055	1,228.00
Disturbed Southern Mixed Chaparral	–	–	–	157.80
Chamise Chaparral	–	–	–	18.81
Scrub Oak Chaparral	–	–	–	57.80
Subtotal	*0.2711*		*0.375055*	*1,862.5874*
Grasslands				
Valley Needlegrass Grassland	–	–	–	8.1614.22
Saltgrass Grassland	–	–	–	15.4563
Nonnative Grassland	6.27 4.77	1:1	6.27 4.77	1,390.111,361368.08 42 1,369.92
Subtotal	*6.27 4.77*		*6.27 4.77*	*1,398.271,390.95 1,399.77*
Wetlands				
Open Water	–	–	–	0.84
Alkali Marsh	–	–	–	8.81
Emergent Wetland	–	–	–	0.84
Disturbed Wetland	0.006	3:1	0.018	0.804
Non-Vegetated Channel	0.002	3:1	0.006	0.348
Southern Coast Live Oak Riparian Forest	–	–	–	9.37
Mule Fat Scrub	–	–	–	23.2658.532

Vegetation Community/Land Cover Type	Impact Acreage	Mitigation Ratio[1]	Required Mitigation Acreage	Acres Preserved[2]
Southern Willow Scrub	–	–	–	14.26
Subtotal	*0.008*		*0.024*	*58.532*
Woodlands				
Nonnative Woodland	–	–	–	1.02
Eucalyptus Woodland	–	–	–	16.10
Open Coast Live Oak Woodland	0.08	3:1	0.24	20.50
Dense Coast Live Oak Woodland	–	–	–	82.13
Subtotal	*0.08*		*0.24*	*119.75*
Other Land Cover Types				
Agriculture	–	–	–	17.88
Developed Lands	–	–	–	1.50
Subtotal			–	*43.2592*
Total	**6.6347 4.97**		**6.9159 5.09**	**3,482.393,416482.55 70 3,484.05**

1 – These ratios are subject to change if the North County MSCPPlan is approved prior to project implementation.

2 – Acreage within the Preserve not impacted as part of the proposed project does not count towards the necessary impacts on sensitive vegetation communities

Table 2. Habitat/Vegetation Communities Impacts and Proposed Mitigation (Alternative Creek Crossing)

Vegetation Community/Land Cover Type	Impact Acreage	Mitigation Ratio[1]	Required Mitigation Acreage	Acres Preserved[2]
Scrub and Chaparral				
Diegan Coastal Sage Scrub	–	–	–	151.02
Disturbed Diegan Coastal Sage Scrub	0.13–	2:1–	0.26–	47.8497
Coastal Sage-Chaparral Scrub	0.03–	2:1–	0.06–	201.3134
Southern Mixed Chaparral	0.10	0.5:1	0.05	1,228.01
Disturbed Southern Mixed Chaparral	–	–	–	157.80
Chamise Chaparral	–	–	–	18.81
Scrub Oak Chaparral	–	–	–	57.80
Subtotal	*0.2610*		*0.3705*	*1,862.5975*
Grasslands				
Valley Needlegrass Grassland	–	–	–	8.1614.22
Saltgrass Grassland	–	–	–	15.4563
Nonnative Grassland	5.43 3.93	1:1	5.43 3.93	1,390.951,362369.12 26 1,370.76
Subtotal	*5.43 3.93*		*5.43 3.93*	*1,399.111,391.79 1,400.61*
Wetlands				
Open Water	–	–	–	0.84
Alkali Marsh	–	–	–	8.81
Emergent Wetland	–	–	–	0.84
Disturbed Wetland	–	–	–	0.81
Non-Vegetated Channel	–	–	–	0.35
Southern Coast Live Oak Riparian Forest	–	–	–	9.37
Mule Fat Scrub	–	–	–	23.26
Southern Willow Scrub	–	–	–	14.26

Vegetation Community/Land Cover Type	Impact Acreage	Mitigation Ratio[1]	Required Mitigation Acreage	Acres Preserved[2]
Subtotal	–		–	*58.54*
Woodlands				
Nonnative Woodland	–	–	–	1.02
Eucalyptus Woodland	–	–	–	16.10
Open Coast Live Oak Woodland	0.07	3:1	0.21	20.51
Dense Coast Live Oak Woodland	–	–	–	82.13
Subtotal	*0.07*		*0.21*	*119.75*
Other Land Cover Types				
Agriculture	–	–	–	17.88
Developed Lands	–	–	–	1.50
Subtotal	–		–	*43.2592*
Total	**5.7660 4.10**		**6.015.69 4.19**	**3,483.253,476.2783. 41 3,484.91**

1 – These ratios are subject to change if the North County MSCPPlan is approved prior to project implementation.

2 – Acreage within the Preserve not impacted as part of the proposed project does not count towards the necessary impacts on sensitive vegetation communities

Table 1. Impacts to Sensitive Vegetation Communities (Proposed Project) – Trail Phasing

Vegetation Community[1]	New trail segment in NW portion of the Preserve (Phase II)	Dry Weather Crossing of Santa Maria Creek (NW Portion of Preserve) (Phase II)	Temporary Staging Area (NW Portion) (Phase II)	New off-site trail segment (east-west connector trail) (Phase II)	Staging Area (NE Portion) (Phase I)	**Impact Totals**	Mitigat Ratio
NNG	0.18	--	0.86	0.22	3.51	**4.77**	**1:1**
OCLOW	0.08	--	--	--	--	**0.08**	**3:1**
Disturbed Wetland	--	0.006	--	--	--	**0.006**	**3:1**
Non-Vegetated Channel	--	0.002	--	--	--	**0.002**	**3:1**
SMC	0.11	--	--	--	--	**0.11**	**0.5:1**
Totals	**0.37**	**0.008**	**0.86**	**0.22**	**3.51**	**4.968**	

1 NNG – Non-native Grassland; OCLOW – Open Coast Live Oak Woodland; SMC – Southern Mixed Chaparral

2 These ratios are subject to change if the North County Plan is approved prior to project implementation

Table 2. Project Impacts to Sensitive Vegetation Communities (Alternative Santa Maria Creek Crossing) – Trail Ph

Vegetation Community[1]	New trail segment in NW portion of the Preserve (Phase II)	New off-site trail segment (on RMWD property) (Phase II)	New off-site trail segment (east-west connector trail) (Phase II)	Staging Area (NE Portion) (Phase I)	**Totals**
NNG	0.17	0.03	0.22	3.51	**3.93**
OCLOW	0.07	--	--	--	**0.07**
SMC	0.10	--	--	--	**0.10**
Totals	**0.34**	**0.03**	**0.22**	**3.51**	**4.10**

1 NNG – Non-native Grassland; OCLOW – Open Coast Live Oak Woodland; SMC – Southern Mixed Chaparral

2 These ratios are subject to change if the North County Plan is approved prior to project implementation

B. Cultural Resources

~~1.~~ 1. Prior to any ground-disturbing activities prescribed in the RMP and VMP, including fire management, invasive nonnative plant removal efforts, and revegetation, the proposed area of activity will be reviewed for cultural resources. If cultural resources occur in the area, ground disturbing impacts in the area of the resource should be avoided, thereby fulfilling the management directives for cultural resources. To avoid impacts, the RMP and VMP generally stipulate the use of techniques that would not disturb the ground, such as passive habitat restoration and vegetation removal. If avoidance and non-destructive methods are infeasible, the affected resource should be evaluated for significance by a qualified archaeologist, per County guidelines.

~~2.~~ 2. Prior to the construction of any new trail segments or the proposed bridge, all of which were located to avoid cultural resources, the locations of new construction shall be field checked by a qualified archaeologist to ensure that they do indeed avoid known cultural resources. To avoid adverse impacts on P-37-030845 (County Survey Road 97), a federal, state, and locally significant resource, a passive form of revegetation shall be adopted for restoration of the southern loop trail of County Survey Road 97.

For CA-SDI-~~127~~10270, a resource located along the proposed east-west connector trail on non-Preserve land, the location of the site shall be confirmed in the field by a qualified archaeologist and the trail shall be rerouted if possible to avoid impacts. If avoidance is infeasible, the resource should be evaluated for significance by a qualified archaeologist, per County guidelines.

The location of the proposed viewing pavilion/kiosk in the NE portion of the Preserve shall be designed to avoid the one cultural resource in the area, CA-SDI-16628.

All trail signs, markers, fencing, and gates in the Preserve should be placed in areas that avoid known cultural resources. If this recommendation cannot be met, MM-4 shall be followed during installation.

~~3. Permanent split rail fencing with signage (e.g., signs that read "Please Stay on Trail") shall be placed along the trail route in the NW portion of the Preserve in the vicinity of CA-SDI-19558, a sensitive cultural resource identified by Native American representations. The fencing should be placed along that portion of the trail from which the site can be accessed. The purpose would be to protect the resource from unauthorized visitation.~~

~~4.~~ 3. All ground-disturbing activity related to implementation of the project, including installation of trail signage, potential building removal, trenching, grading associated with trail installation, etc., shall be monitored by a qualified archaeologist and, where the resource involved is a prehistoric archaeological site, by a Native American representative. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until a qualified archaeologist can evaluate the find and make appropriate recommendations for treatment.

~~5.~~ 4. Any ground-disturbing activities on the Preserve must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to CEQA Guidelines Section15064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance.

Should Native American human remains be identified during ground disturbing activities related to the project, whether during construction, maintenance, or any other activity as outlined in the RMP and VMP, State and County mandated procedures shall be followed for the treatment and disposition of those remains, as follows:

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DRP will ensure that the following procedures are followed:

a~~1~~. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains, until:

1~~a~~. A County (DPR) official is contacted.

2~~b~~. The County Coroner is contacted to determine that no investigation of the cause of death is required.

3~~c~~. If the Coroner determines the remains are Native American, then:

i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American.

iii. The Most Likely Descendent (MLD) may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in PRC Section 5097.98.

b~~2~~. Under the following conditions, the landowner or its authorized representative shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further disturbance:

1~~a~~. The NAHC is unable to identify a MLD or the MLD fails to make a recommendation within 24 hours after being notified by the NAHC.

2~~b~~. The MLD fails to make a recommendation.

3~~c~~. The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner.

c~~3~~. Any time human remains are encountered or suspected and soil conditions are appropriate for the technique, ground penetrating radar (GPR) will be used as part of the survey methodology. In addition, the use of canine forensics will be considered when searching for human remains. The decision to use GPR or canine forensics will be made on a case-by-case basis through consultation among the County Archaeologist, the project archaeologist, and the Native American monitor.

d~~4~~. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as:

1~~a~~. Cremations, including the soil surrounding the deposit.

2~~b~~. Interments, including the soils surrounding the deposit.

3~~c~~. Associated grave goods.

In consultation among the County archaeologist, project archaeologist, and Native American monitor, additional measures (e.g., wet-screening of soils adjacent to the deposit or on site) may be required to determine the extent of the burial.

3. Critical Project Design Elements That Must Become Conditions of Approval:

While the management directives and implementation measures outlined in the Resource Management Plan and Vegetation Management Plan are

technically not mitigation measures, the implementation of these plans must be assured to avoid potentially significant environmental effects. The Resource Management Plan and Vegetation Management Plan are attached as part of this Mitigated Negative Declaration.

ADOPTION STATEMENT: This Mitigated Negative Declaration was adopted and above California Environmental Quality Act findings made by the:

_____(Decision-Making Body)

On _____(Date/Item #)

Megan Hamilton, Group Program Manager
Department of Parks and Recreation

County of San Diego

DEPARTMENT OF PARKS AND RECREATION

BRIAN ALBRIGHT
DIRECTOR

Administrative Office: (858) 694-3030
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~~November 8, 2011~~Revised February 4, 2013

(Based on the State CEQA Guidelines, Appendix G Rev. March, 2010)

1. Project Name/Number:

   Ramona Grasslands Preserve

2. Lead agency name and address:

   County of San Diego, Department of Parks and Recreation
   5500 Overland Drive, Suite 410
   San Diego, CA 92123

3. a. Contact: Megan Hamilton, Group Program Manager

   b. Phone number: (858) 966-1377

   c. E-mail: Megan.Hamilton@sdcounty.ca.gov

4. Project Location:

   The project is located approximately 6.0 miles east of Interstate 15 (1-15), 1.5 miles north of State Route 78 (SR-78), and 2.0 miles west of downtown Ramona in unincorporated San Diego County (see attached Figures 1 through 3). The project is primarily just west of the Ramona Airport and east and north of Highland Valley Road. The project is within the western portion of the Valle de Pamo (or Santa Maria Valley, T 13S, R 1E and R 1W), part of the historic Santa Maria Rancho,

   The Project's 3,490 acres are divided into four distinct portions:

   - The northwest (NW) portion is bounded to the south by an unpaved road and RMWD land, and by rural residential development and open space along its other boundaries.

- The southwest(SW) portion is bounded to the south by Highland Valley Road, west by rural residential development, northeast by Ramona Municipal Water District (RMWD) land, and east by Rangeland Road.
- The northeast (NE) portion is bounded to the south by the Ramona Airport, west by RMWD land and rural residential development, north by rural residential development, and east by planned residential development and associated proposed open space.
- The southeast (SE) portion is bounded to the south primarily by rural residential development, west by Rangeland Road and the SW portion of the Preserve, north by RMWD land and the Ramona Airport.

Thomas Brothers Coordinates: Pages 1151, 1152, 1171, and 1172 (spans multiple grids)

5. Project Applicant name and address:

   County of San Diego, Department of Parks and Recreation
   5500 Overland Drive, Suite 410
   San Diego, CA 92123

6. General Plan Designation

   (18) Multiple Rural Use

   (19) Intensive Agriculture

   (20) General Agriculture

   (21) Specific Plan Area

   (22) Public/Semi-Public

7. Zoning

   (S88) Specific Planning Area

   (A70) Limited Agricultural Use

8. Description of Project:

   The proposed Ramona Grasslands Preserve Project (Project) would provide resource management and recreational use improvements to enhance the existing Ramona Grasslands Preserve (Preserve). The 3,490-acre Preserve was acquired in sections starting in 2003.The Preserve is operated, administered, and managed by the County Department of Parks and Recreation (DPR).

   The project has four components including implementation of the management directives identified in the Ramona Grasslands Preserve

Resource Management Plan (RMP)(ICF 2011a; provided as an attachment to this report) and the Ramona Grasslands Preserve Vegetation Management Plan (VMP)(ICF 2011b; provided as an attachment to this report); establishment of a multi-use trail system within the Preserve consistent with the Ramona Grasslands Preserve Public Access Plan (PAP)(WRT 2010); and construction of supporting infrastructure improvements. The RMP and VMP have both been developed by DPR to guide the management and preservation of biological and cultural resources within the Preserve. Each of these four project components is discussed in more detail below.

Resource Management Plan

The proposed RMP provides Area-Specific Management Directives (ASMDs) that is anticipated to meet the requirements of the Draft North County ~~MSCP~~ Plan (County 2011) and the associated Draft North County ~~MSCP~~ Plan Framework Resource Management Plan (County 2011). Specifically, the RMP establishes baseline conditions from which adaptive management will be determined and success will be measured; guides the management and monitoring of biological and cultural resources to protect and enhance their values; serves as a guide for appropriate onsite public uses; and provides an overview of the operation and maintenance requirements to implement management goals.

The RMP includes management directives and implementation measures to meet MSCP goals and objectives under the following elements: A) Biological Resources; B) Vegetation Management; C) Public Use, Trails, and Recreation; D) Operations and Facility Maintenance; and E) Cultural Resources. Specific management directives are listed below. Detailed implementation measures associated with each management directive can be found in the RMP. Specific implementation measures that may result in physical environmental effects are identified below and discussed in more detail throughout this Initial Study as appropriate.

Biological Resources

The following management directives focus on biological monitoring; ~~South~~ MSCP Subarea Plan and Draft North County ~~MSCP~~ Plan covered species-specific monitoring and management; nonnative invasive wildlife species control; and future research.

Management Directive A.1 – Conduct habitat monitoring to ensure MSCP goals and DPR objectives are met.
Management Directive A.2 – Meet the corridor monitoring requirements of the MSCP.
Management Directive A.3 – Prepare biological monitoring report.

Management Directive A.~~3~~ 4 – Provide for management and monitoring of Draft North County ~~MSCP~~ Plan and ~~South County~~ MSCP Subarea Plan covered species and County Group A and B plant species.

Management Directive A.~~4~~ 5 – Reduce, control, or where feasible eradicate invasive, nonnative fauna known to be detrimental to native species and/or the local ecosystem.

Management Directive A.~~5~~ 6 – Allow for future research opportunities for the academic and professional scientific and biologic activities within the Preserve.

Management Directives A.1, A.2, A.3, A.4, and A.5, and A.6 would not result in any physical environmental effects because associated implementation measures would be limited to monitoring and survey activities, trapping and removal of invasive wildlife species (a beneficial effect), equestrian education, and allowance of future research consistent with the RMP. Therefore, these directives are not discussed further in this Initial Study.

Implementation of Management Directive A.~~3~~ 4 would include habitat management measures such as invasive nonnative plant species control, grazing, habitat restoration, and fire control/threat reduction to maintain desired habitat qualities in the Preserve for special-status species. Therefore, physical environmental effects associated with this directive are considered further in this Initial Study.

Vegetation Management

The following management directives focus on habitat restoration and enhancement; invasive nonnative plant species removal and control; fire prevention, control, and management; and grazing.

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.

Management Directive B.2 – Reduce, control, or where feasible eradicate invasive, nonnative flora known to be detrimental to native species and/or the local ecosystem.

Management Directive B.3 – Manage and minimize the expansion of invasive, nonnative flora within the Preserve.

Management Directive B.4 – Provide for necessary fire management activities that are sensitive to natural and cultural resources protection.

Management Directive B.5 – Implement grazing regime within the Preserve to maintain and enhance biological resources.

Management Directive B.3 would not result in any physical environmental effects because associated implementation measures would be limited to education programs for visitors, adjacent residents, and equestrian users of the Preserve. Therefore, this directive is not discussed further in this Initial Study.

Implementation of Management Directives B.1, B.2, B.4, and B.5 would include habitat restoration activities, active treatment prescriptions for diseases and pests, invasive nonnative plant species control, grazing management, fire control/threat reduction (i.e., fuel modification zones and defensible spaces), and road/trail/emergency access maintenance. Therefore, physical environmental effects associated with these directives are considered further in this Initial Study.

Public Use, Trails, and Recreation

The following management directives focus on public access; fencing and gates; trail and access road maintenance; and signage and lighting.

Management Directive C.1 – Limit types of public uses to those that are appropriate for the site.
Management Directive C.2 – Manage public access in sensitive biological and cultural resource areas within the Preserve.
Management Directive C.3 – Provide appropriate interpretive and educational materials.
Management Directive C.4 – Install and maintain fencing and gates within the Preserve.
Management Directive C.5 – Properly maintain trails for user safety, to protect natural and cultural resources, and to provide high-quality user experiences.
Management Directive C.6 – Develop, install, and maintain appropriate signage to effectively communicate important information to Preserve visitors.

Management Directives C.1, C.2, and C.6 would not result in any physical environmental effects because associated implementation measures would be limited to identification of prohibited uses, monitoring the number and type of trail users, and placement and maintenance of appropriate signage. Therefore, these directives are not discussed further in this Initial Study.

Implementation of Management Directives C.3, C.4, and C.5 would include installation of educational kiosks, fence maintenance and installation, trail repair and maintenance, and habitat restoration of trail edge effects.

Therefore, physical environmental effects associated with these directives are considered further in this Initial Study.

Operations and Facility Maintenance

The following management directives focus on litter/trash and material storage; hydrological management; emergency, safety, and police services; and adjacent management issues.

Management Directive D.1 – Maintain a safe and healthy environment for Preserve users.
Management Directive D.2 – Publicize and enforce regulations regarding littering/dumping.
Management Directive D.3 – Retain Santa Maria Creek in its natural condition.
Management Directive D.4 – Monitor water quality and physical dimensions of Santa Maria Creek.
Management Directive D.~~4~~ 5 – Monitor Santa Maria Creek box culvert under Rangeland Road.
Management Directive D.~~5~~ 6 – Retain un-named tributaries to the Santa Maria Creek in their natural condition.
Management Directive D.~~6~~ 7 – Provide w~~W~~atershed education to promote water quality and water sustainability.
Management Directive D.~~7~~ 8 – Ensure the effectiveness of the existing earthen dam in the southwest portion of the Preserve.
Management Directive D.9 – Manage and monitor TNC Vernal Pool Mitigation Parcel and Two Acre Subset of the Ramona Airport Property Containing Vernal Pools C3w, C21a, C21, K3, R24, C20, K2, C2e, C3e, C19a, and R5.
Management Directive D.10 – Manage and monitor TNC Wetland Mitigation Parcel.
Management Directive D.~~8~~ 11 – Maintain or increase the ability of emergency response personnel to deal with emergencies within the Preserve or vicinity.
Management Directive D.~~9~~ 12 – Maintain emergency evacuation route for the public to use in the event of an emergency.
Management Directive D.~~10~~ 13 – Provide for a safe recreational experience for Preserve visitors.
Management Directive D.~~11~~ 14 – Coordinate with adjacent land managers with large areas of undeveloped land.
Management Directive D.15 – Coordinate with adjacent property owners with biological and open space easement and conserved lands.
Management Directive D.~~12~~ 16 – Enforce Preserve boundaries.

Management Directive D.~~13~~ 17 – Educate residents of surrounding areas regarding adjacency issues.

Management Directives D.1, D.2, D.3, D.4, D.5, D.6, D.7, D.8, D.9, D.10, D.11, ~~D.12, and~~ D.13, D.14, D.15, D.16, and D.17 would not result in any physical environmental effects because associated implementation measures would be limited to identification of restrictions for temporary storage of toxic materials and prohibition of permanent storage, litter monitoring and enforcement, fence installation and maintenance, culvert inspection, avoidance and protection of unnamed tributaries, interpretive signage, provision of accessibility for law enforcement and emergency agencies, coordination with adjacent land managers, enforcement of Preserve boundaries and removal of intrusions, and environmental education for local residents. Therefore, these directives are not discussed further in this Initial Study.

Implementation of Management Directive D.~~9~~ 12 would include maintenance mowing for the emergency access route. Therefore, physical environmental effects to biological resources and cultural resources associated with this directive is considered further in this Initial Study.

Cultural Resources

The following management directives focus on long-term preservation of cultural resources in the Preserve; opportunities for public interpretation; and opportunities for interaction with the Native American groups whose traditional territories encompass all or part of the Preserve.

Management Directive E.1 – Identify, record, and assess the significance of cultural resources within the Preserve in areas over 20 percent slope.

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

Management Directive E.3 – Promote the beneficial uses of cultural resources through interpretation and educational programs.

Management Directive E.4 – Honor Native American Heritage and promote Native American ceremonies, gathering, and cultural practices.

Management Directive E.5 – Develop and implement proper protocols in the event that Native American human remains are found during grading, brush removal, or other construction and maintenance activities.

Management Directives E.1, E.3, and E.4 would not result in any physical environmental effects because associated implementation measures would be limited to identification and recordation of previously unidentified cultural resources in unsurveyed areas should appropriate site conditions exist (i.e., ground visibility), public interpretation and education, and coordination with local tribes, and allowance of traditional tribal uses. Therefore, these directives are not discussed further in this Initial Study.

Implementation of Management Directive E.2 would include identification and potential mitigation of threats to cultural resources resulting from Preserve management actions. Therefore, physical environmental effects associated with this directive are considered further in this Initial Study. Implementation of Management Directive E.5 would include conditions for the treatment and handling of human remains. The cultural resource effects associated with this directive are considered further in this Initial Study.

Preserve Vegetation Management Plan

Similar to the RMP, the VMP provides management guidance through specific and adaptive management practices with its focus on the vegetative resources within the Preserve. The VMP will enhance appropriate habitat for native target species through removal and control of invasive nonnative species; provide a framework for the restoration of closed trails within the Preserve; provide a fire management strategy that plans for wildland fires; and provide a grazing management plan based on historic, current, and proposed grazing practices.

The VMP includes management directives under the following elements: invasive nonnative species management; habitat restoration; grazing; and fire management.

Invasive Nonnative Species Management

Directives for invasive nonnative plant species management focus primarily on the control of tamarisk (*Tamarisk ramosissima*), giant reed (*Arundo donax*), perennial pepperweed (*Lepidium latifolium*), artichoke thistle (*Cynara cardunculus*), milk thistle (*Silybum marianum*), and castor bean (*Ricinus communis*), as well as other targeted invasive nonnative plant species found within the Preserve. Invasive nonnative species management includes annual inspections of all previously infested Preserve areas and to document newly infested areas, followed by treatment (i.e., hand or mechanical removal and disposal, herbicide treatment, prescribed fire or grazing in grasslands) of individual invasive nonnative plants prior to flowering and seed set. Treated areas would be monitored to ensure effectiveness of treatment efforts.

Habitat Restoration

Habitat restoration directives support reestablishment of areas of the Preserve through natural processes (i.e., passive restoration) to the extent feasible. Active restoration activities would only occur following landscape changing disturbances that remove, damage, degrade, or alter the desired native habitats. Active restoration methods would be tailored to the type of disturbance and would require preparation of a detailed restoration plan. Management directives for habitat restoration include monitoring of invasive nonnative plant species removal sites to ensure passive natural recruitment is successful; monitoring habitat quality for sensitive wildlife species to determine if active restoration is necessary to return habitats to pre-fire habitat quality; and monitoring for the presence of disease or pest levels to determine outbreaks and prescribe appropriate treatment.

Grazing

Management directives related to grazing include 1) maintaining the condition of loamy grassland habitats suitable for species such as Stephens' kangaroo rat and raptors to ensure long-term persistence of these species; and 2) decreasing the cover of invasive nonnative annual grasses and forbs and the amount of thatch in the vernal pools to improve vernal pool functions.

Fire Management

Management directives related to fire management focus on the cooperation between Cal Fire, the Ramona Fire Department, and DPR for maintaining a safe fire environment at the Preserve. These directives include providing Cal Fire and the Ramona Fire Department with guidance regarding the natural resource and cultural values at risk during wildfires that threaten the Preserve; minimizing the disturbance of natural and cultural resources during fire suppression on the Preserve when feasible; providing defensible space within the Preserve adjacent to improvements through fuel modification zones; and limiting public access to the Preserve during periods of high wildland fire danger using methods such as seasonal closures; and limit potential of wildfires by posting no smoking signs.

Public Access Plan

An approximately ~~12~~9.3~~.4~~-mile multi-use trail system for hiking, biking, and equestrian users will be established connecting ~~the four~~ three portions of the Preserve consistent with the Preserve PAP recommendations (Figure 3- Revised, Table 1). The trail system would utilize existing ranch roads and trails to the greatest possible extent, with some new trail construction and a crossing of Santa Maria Creek to increase connectivity in the Preserve. The plan also involves an alternative route that would utilize a road and bridge

crossing on RMWD property, proposed to be constructed by RMWD in association with their yet to be approved Santa Maria Wastewater Treatment Plant Expansion project. If this alternative is chosen, DPR would be required to construct a short trail segment on RMWD land to connect to the road and bridge. Approximately ~~ten~~ eight (~~10~~8) miles of the proposed trail system already exists in the form of 4-10 foot wide dirt roads that either remain from prior ranching activity or were recently constructed as part of the previously approved Oak Country II Trails Project. New trail connections would be constructed in the NW ~~and NE~~ portions of the Preserve.

Table 1. Proposed Trails and Pathways

Location	Trail Segment	Trail/Pathway Miles		
		Existing	New	Total
SW	Oak Country II Trail	3.8	0.0	3.8
	SW Trail Total	**3.8**		**3.8**
NW	~~Old Survey Road 97 and public road easement connection from Rangeland Road~~	~~2.9~~ 0.0	~~0.0~~	
	NW – SW Connector and Proposed Creek Crossing and public road easement connection from Rangeland Road	~~0.0~~0.6	~~1.4~~0.8	1.4
	NW Trail Total	**~~2.9~~0.6**	**~~1.4~~0.8**	**~~4.3~~1.4**
NE	East-West Segment and North-South Segment	~~2.9~~3.2~~2~~.8	0.0	2.8
	~~Re-alignment along North-South Segment~~	~~0.0~~	~~0.3~~0.0	
	Trail Segment east of Proposed Staging Area	0.2	0.0	0.2
	Easement connection to Rangeland Road	0.~~5~~7	0.4	1.1
	NE Trail Total	**3.~~6~~9~~6~~7**	**0.~~7~~4**	**4.31**
	Total Trails for the Preserve	**~~10.3~~8.1**	**~~2.1~~1.8~~1~~.2**	**~~12.4~~9.3**
Pathways	Proposed Rangeland Road Pathway (from NW Portion south to Easement Connection with NE Portion)	0.0	0.7	0.7
	Potential Future Highland Valley Road Pathway Including Rangeland Road Pathway south of Easement Connection with NE Portion	0.0	1.3	1.3
	Pathway Total	**0.0**	**2.0**	**2.0**

Proposed trails and pathways are described below for each portion of the Preserve.

Trail and Pathway Alignments

Southwest Portion

Public access in this portion of the Preserve is provided by the previously approved and recently constructed Oak Country II trails, comprising approximately four miles of trails in two connected loops. The Oak Country II trail project includes a staging area off Highland Valley Road with two shaded picnic areas, ten vehicle parking spaces with overflow room and pull-through parking for four vehicles towing trailers. No additional trail improvements are proposed at the SW portion as part of this project, with the exception of the connection to the NW portion discussed below.

Northwest Portion

~~Approximately three miles of trails are proposed for this portion of the Preserve, including about 2.35 miles that trace part of Old Survey Road 97.~~ Construction of a new 1.4-mile trail segment will connect ~~the southern end of Old Survey Road 97 with the~~ Oak Country II trails in the SW portion of the Preserve to Rangeland Road. This connection would necessitate crossing Santa Maria Creek (see discussion below).

~~Near the northwest corner of the NW portion of the Preserve, the existing Old Survey Road 97 splits into a southern and northern route. The southern route would be closed and passively restored as habitat.~~

Access to the proposed trail in this portion of the Preserve from the east is via a 0.~~5~~7-mile public road easement (i.e., unpaved road) that lies between the NW portion of the Preserve and RMWD property. This unpaved road intersects with the proposed pathway along Rangeland Road. There would be no provisions for vehicle parking at this location. This trail access point would include a kiosk for visitor orientation and general information. The main access is from the west via the Oak Country II staging area.

~~Access would primarily occur via a proposed new trail segment connecting with the Oak Country II trails in the SW portion of the Preserve. Visitors would be able to reach this access point by using the existing Oak Country II staging area.~~

Public access in the NW portion of the Preserve includes a proposed crossing of Santa Maria Creek, which initially would be a dry weather crossing. At some point in time, an all-weather structural crossing (e.g., bridge) would be constructed for pedestrian, cyclist, and equestrian use. The structural crossing would have a maximum width of 12 feet and would consist of non-slip and all-weather materials consistent with the guidelines from the Community Trails Master Plan (San Diego County 2005; updated in 2009).

The structural crossing would be designed with sufficient length to span Santa Maria Creek with little to no direct impacts on federal and state jurisdictional waters or wetlands. A temporary construction staging area would be established during bridge construction. ~~Approximately 4.3 miles of trails are proposed for this portion of the Preserve, consisting of existing unpaved ranch roads and trails and new trail construction.~~

An alternative to the proposed crossing of Santa Maria Creek discussed above is to utilize a crossing proposed to be constructed by the Ramona Municipal Water District (RMWD) on their property associated with their yet to be approved Santa Maria Wastewater Treatment Plant Expansion project. The proposed crossing is located immediately south of the northwest portion of the Preserve. This alternative would require permission from RMWD and could be utilized after RMWD constructs the proposed crossing.

There is an existing ranch road that traverses the NW portion of the Preserve in a north, and then northwesterly direction, known as Old Survey Road 97. Although this route is no longer formally part of the proposed trail network it will possibly be open for public access during docent-led tours at appropriate times of the year—as determined by monitoring. Near the northwest corner of the NW portion of the Preserve, the existing Old Survey Road 97 splits into a southern and northern route. The southern route will be closed and passively restored as habitat.

Northeast Portion

Primary access to the proposed trails in the NE portion is from the east, which can be reached via an unpaved unnamed road extending west from Montecito Way. A new staging area would be constructed directly east of a vacant house with associated barn and rodeo corral. The staging area would be up to a maximum of approximately three acres in size and would include visitor parking for ~~30~~ 20 cars and ~~18~~ 10 vehicles with horse trailers with room for overflow parking, hitching rails, an informational kiosk, trash receptacles, bathrooms, and picnic tables or benches. Secondary access would occur from Rangeland Road via a 1-mile public access easement (i.e., unpaved road) through RMWD property. This access route utilizes a portion of an existing unpaved road, but would also require 0.4 mile of new trail construction where the easement is adjacent to the Ramona Airport property. Signage and fencing would be installed to keep visitors on the trail and off RMWD and Ramona Airport properties.

Trails proposed in the NE portion of the Preserve would follow existing ranch roads and trails~~, with the exception of an approximately 0.3-mile long section where the proposed trail will deviate from the existing road/trail to avoid public access within sight of a rocky outcrop frequently used by foraging raptors, in~~

~~addition to rerouting to avoid a severely eroded section. The new trail will loop around the west side of a small hill and then reconnect with the existing road/trail~~.

Southeast Portion

Because of existing deed restrictions and sensitive resources throughout the SE portion of the Preserve, most of this area is unavailable for public access. However, the southeastern tip (the former Hardy Ranch property) allows for connection to a future trail system associated with the proposed Cumming Ranch Development adjacent to the Preserve. If the Cumming Ranch Development, including trails, moves forward, there would be an approximately 0.3-mile trail connector segment within the SE portion. This segment is included in the Cumming Ranch Development Draft EIR and is not a part of this project, and therefore is not analyzed in this report.

~~*Trail Implementation Plan (Phases I, II & III)*~~

~~Trail construction and recreational use within the Preserve would proceed in three phases. Phase I will include the trails, staging area, and associated infrastructure in the NE northeast portion of the preserve. As discussed above this will include the establishment of a new staging area near Montecito Way (Figure XX3). Phase II will involve connecting the existing Oak Country II tTrail system to Phase I. This will include implementing the proposed Santa Maria Creek trail crossing or the proposed alternative RMWD crossing. Finally, Phase III will involve opening up the northwestNW portion of the Preserve to recreational trail use. The primary purpose for phasing the use of the trails at the Preserve is to allow sufficient time for additional studies to be completed at the Preserve. These studies will include an evaluation of trail use data within the existing Oak Country II portion of the Preserve. In addition the County will also further evaluate baseline raptor use at the Preserve. These raptor studies will concentrate on identifying high use foraging areas, perch sites and nesting locations. The combined studies will inform the County on how to best manage the trail system for both recreational use and raptor/golden eagle conservation.~~

Pathway

In addition to new trails, pathways are proposed along Highland Valley and Rangeland Roads located between the road paving and existing fencing within the right-of-way, with the pathway route as far from vehicle travel lanes as possible. Combined, the pathways total about two (2) miles in length. The northern 0.7-mile segment of the Rangeland Road pathway is proposed to be constructed in Phase II (see below). The Highland Valley Road pathway and the southern section of the Rangeland Road pathway may be constructed in the future. The Highland Valley Road pathway is approximately 0.8 mile and would be located on the north side of the road, so that users are adjacent to

the Preserve boundary and on the same side of the road as the Oak Country II staging area. The Rangeland Road pathway is approximately 1.2 miles and would be located on the west side of the road. The location of the pathway on the west side of Rangeland Road would necessitate trail crossing signage for trail users to cross Rangeland Road to reach the access point to the NE portion of the Preserve (via the RMWD easement).

Trail and Pathway Implementation Plan (Phases I, II & III)

Trail construction and recreational use within the Preserve is proposed in three phases (Figure 3-Revised):

- Phase I will include the trails, staging area, and associated infrastructure (maintenance building, viewing pavilion/visitor kiosk, and two volunteer pads) in the NE portion of the Preserve.
- Phase II will involve connecting the existing Oak Country II Trail system to Phase I in the NE portion of the Preserve. This will include ~~1.4~~0.8 miles of new trail with a crossing of Santa Maria Creek, construction of a pathway on the west side of Rangeland Road, installing road crossing signage and construction of 0.4 mile of new trail within the RMWD easement.
- Phase III is a future phase that, if feasible, will construct pathways along the southern portion of Rangeland Road and along Highland Valley Road ultimately connecting the NW and NE portion of the preserve to the Oak Country staging area.

Trail and Pathway Design

Existing Ranch Roads and Trails

Existing ranch roads that are currently used for vehicle access would be maintained to their current width. Other trails would be maintained to four feet wide.

~~In the NW portion, the southern portion of Old Survey Route 97 off of the 0.5-mile road easement would be maintained at its current width of approximately 15 feet for vehicle access for approximately one mile. The remainder of this road would be maintained to a trail width of four feet.~~

In the NE portion, the existing east-west ranch road would be maintained to its current width as needed for vehicle access. The existing dirt road that extends north-south to the northern property boundary would be maintained to four (4) feet wide. ~~Any new trail realignments to avoid eroded sections of the existing north-south dirt road would also be four (4) feet wide. Eroded sections of trails would be passively revegetated.~~

In the SE portion, the existing dirt road/trail in this area would be maintained to ~~four (4)~~its current width of approximately 15 feet wide to facilitate ranger patrol and ranching activity access. This road/trail is not a part of the proposed public trail system.

In the NW portion, the southern portion of Old Survey Road 97 off of the approximately 0.5-mile road easement would be maintained at its current width of approximately 15 feet for vehicle access for approximately one mile. The remainder of this road would be maintained to a trail width of four feet. This will allow for continued use of the ranch road for ranching activities as well as occasional docent-led tours for the public.

New Trails

Construction of new trails within the Preserve would meet the guidelines in the Ramona Community Trails and Pathways Plan and Community Trails Master Plan for Type C (Primitive) trails including four-foot tread width consisting of natural surface material, with brush management requirements of one foot on either side. The new trail segment associated with the RMWD public access easement that connects the northeast portion of the Preserve with Rangeland Road would follow the guidelines for Type C trails, except that it would be constructed the same width as the existing dirt road that it connects to (approximately ten feet wide).

New Pathways

Construction of the new pathways along Highland Valley Road and Rangeland Road would meet the guidelines in the Community Trails Master Plan for Type D pathways including 10-12 feet tread width consisting of decomposed granite, with brush management requirements only at the edge of the pathways.

Trail Use

Based on known trail usage at the California Department of Fish and Game's Hollenbeck Canyon Wildlife Area, a 5,000 acre Preserve which contains approximately 19 miles of double-track trails and an additional 2.4 miles of single-track trails open to public uses, anticipated trail usage at the Preserve is estimated to consist of no more than the following:

- 10-15 equestrian users per day during the week and 15-25 on weekend days,
- 5-10 hikers per day during the week and 20 on weekend days, and
- 5 mountain bikers per day during the week and 10 on weekend days.

Trail and Pathway Maintenance

Trails

Trails would be maintained at or near their original or intended standards, and includes various activities to keep trails in a safe, usable condition. Consistent with the RMP management directives, periodic assessments of trail conditions would be conducted to address surface material, drainage, vegetation clearing, signage, fencing, barriers and any necessary repairs. Trail maintenance activities would include mowing and brush removal, replacement of damaged signs, trail reconstruction and erosion control and stabilization.

Unauthorized trails will be blocked or covered with brush to camouflage them in order to discourage use, allow for revegetation and to protect sensitive habitats. Temporary trail closure may be necessary during maintenance. The trails would be marked with a temporary closed sign to ensure user safety.

Pathways

The San Diego County Department of Public Works (DPW) would be responsible for maintenance of designated pathways and would coordinate the maintenance with similar road maintenance activities involving clearing, grading, weed control, and maintenance of drainage control facilities. Pathway maintenance would include:

- Keeping the pathway free of weeds, brush, rocks, or other obstructions.
- Trimming trees and other vegetation to maintain a minimum vertical (overhead) clearance of 10 feet.
- Repairing erosion in a timely manner by grading, placement of new base material, or installing engineered drainage controls.

Other Infrastructure Improvements

Additional new infrastructure associated with the project includes a staging area, ~~ranger station/interpretive center/restroom facility,~~ a maintenance building, ~~a primitive amphitheatre, picnic areas,~~ a viewing pavilion/visitor kiosk, ~~utility trenching, a horse arena,~~ and two volunteer pads all proposed in the NE portion of the Preserve. ~~These improvements~~ The viewing pavilion/visitor kiosk would be open to the public between 8:00 am and sunset (variable from 5:00-8:00 pm). Each of these infrastructure improvements is described below:

~~Ranger Station/Interpretive/Restroom Facility~~

~~The existing house located southwest of an unpaved road extending west from Montecito Way would be refurbished or replaced to serve as a new ranger station/interpretive/restroom facility that meets federal Americans with Disabilities Act (ADA) Architectural Barriers Act (ABA) accessibility guidelines. A two-space ADA accessible parking lot constructed of decomposed granite would be located adjacent to the house to provide parking for DPR staff. Nighttime security motion sensor lighting would be installed on the building.~~

Maintenance Building

The existing barn structure would be removed and replaced by an approximate 40 foot X 30 foot x 12 foot tall prefab metal maintenance building placed on concrete foundation. Nighttime security motion sensor lighting would be installed on the maintenance building. No hazardous materials would be stored onsite.

~~Amphitheatre~~

~~A primitive amphitheatre would be constructed northeast of the proposed maintenance building and would consist of a 0.1 acre area with decomposed granite as the substrate and wooden bench seating in a semi-circle for up to 35 people. The amphitheatre would be ADA accessible. The amphitheatre would be used mostly for classroom education activities.~~

~~Picnic Areas~~

~~Two shaded picnic area structures (each approximately 10 feet X 20 feet) would be constructed near the amphitheater. Another shaded picnic area structure (10 feet X 20 feet) would be constructed north of the proposed horse arena. These structures would be unpaved.~~

Visitor Kiosk/Pavilion

A viewing pavilion and visitor kiosk, approximately 10 feet X 30 feet with a semi-shaded trellis structure would be constructed on the hill in the vicinity of the existing residence and within existing disturbed/developed areas. The visitor kiosk would be accessible by pedestrian traffic only.

~~Utility Trenching~~

~~Trenching of an existing water line would be completed to allow for a new water pipeline to be routed serving the existing residence on the hill, which is~~

~~proposed as a potential ranger residence/interpretive center. Trenching would originate at the previous trailer home location west of the existing residence.~~

~~Horse Riding Arena~~

~~The project would also include restoration of the existing rodeo corral to a horse riding arena, located south of the proposed staging area. DPR would enter into a Memorandum of Agreement (MOA)/Memorandum of Understanding (MOU), with the Ramona Trails Association (RTA) where the County owns the property and maintains the connecting trails, and the RTA operates and maintains the horse riding arena. The refurbished arena would measure 130 by 317 feet, operate during Preserve hours, and vary in usage from 5-10 users per day on weekdays and 10-25 on weekends. The concrete blocks and metal and wood debris associated with the existing rodeo corral area onsite would be removed as part of the DPR initial stewardship and land maintenance.~~

Volunteer Pads

Two volunteer pads would be constructed in the NE portion of the Preserve. Each pad will be approximately 100 feet X 100 feet, constructed with gravel, and include electrical and gas hook-up, water, and sewer. Utilities will connect to existing facilities at the site. The first pad will be constructed on the west side of the existing residence located at 944 Montecito Way and the second pad will be constructed on the west side of the hill where the existing residence is located at 942 Montecito Way.

9. Surrounding Land Uses and Setting:

The project area is within the Santa Maria Valley, which consists of a broad basin surrounded by gentle hills and rocky rises ranging in elevation from approximately 1,350 feet (ft) above mean sea level (AMSL) along the valley floor, to over 1,700 ft AMSL in the rocky hills of the northern sections of the Preserve. The Preserve consists of very high to high value natural communities including a large portion of Santa Maria Creek within the western and southern portions of the Preserve. Rangeland Road runs north/south to the west of the NE portion of the Preserve and continues north providing vehicular access to a private gated residential development that borders the northern portion of the Preserve. Several other residential properties exist on all sides of the Preserve. Other surrounding properties include the RMWD, which is located west of Rangeland Road and is bordered by the Preserve to the north, south, and west. Ranch land exists east of Rangeland Road and is bordered by the Preserve to the east and south. The Ramona Airport exists east of Rangeland Road and borders the Preserve to the north and south. Other areas around the periphery of the Preserve are used for dry farming, and small citrus and avocado orchards. Additionally, two

new residential communities are planned adjacent to the Preserve, both including open space areas that are proposed to be conserved as project mitigation.

The NW portion of the Preserve is characterized by rocky hills bisected by Bandy Canyon, through which the Santa Maria Creek flows. The SW portion consists of rolling hills with rocky outcrops with areas of oak woodlands and grasslands. The NE portion is characterized by rocky chaparral-covered hillsides and grasslands. The SE portion of the Preserve consists of rolling hills supporting grassland and rocky outcrops. The Santa Maria Creek channel follows the southern boundary in this area.

Several gates along or near Rangeland, Montecito, and Highland Valley Roads provide access to the Preserve.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	**Agency**
Biological Opinion	US Fish and Wildlife Service
Habitat Conservation Plan ~~Section 7 Consultation~~	US Fish and Wildlife Service
Section 404 Nationwide Permit	US Army Corps of Engineers
California Endangered Species Act Permit (Fish and Game Code Section 2081) or	CA Dept. of Fish and Game
Consistency Determination (Fish and Game Code Section 2080.1)	CA Dept. of Fish and Game
Section 1600 Streambed Alteration Agreement	CA Dept. of Fish and Game
Section 401 Water Quality Certification	San Diego Regional Water Quality Control Board

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

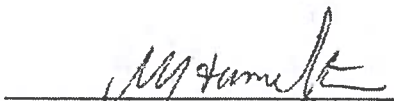
☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☑ Biological Resources	☑ Cultural Resources	☐ Geology & Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Haz. Materials	☐ Hydrology & Water Quality
☐ Land Use & Planning	☐ Mineral Resources	☐ Noise
☐ Population & Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities & Service Systems	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

☐ On the basis of this Initial Study, the Department of Parks and Recreation finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☑ On the basis of this Initial Study, the Department of Parks and Recreation finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ On the basis of this Initial Study, the Department of Parks and Recreation finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

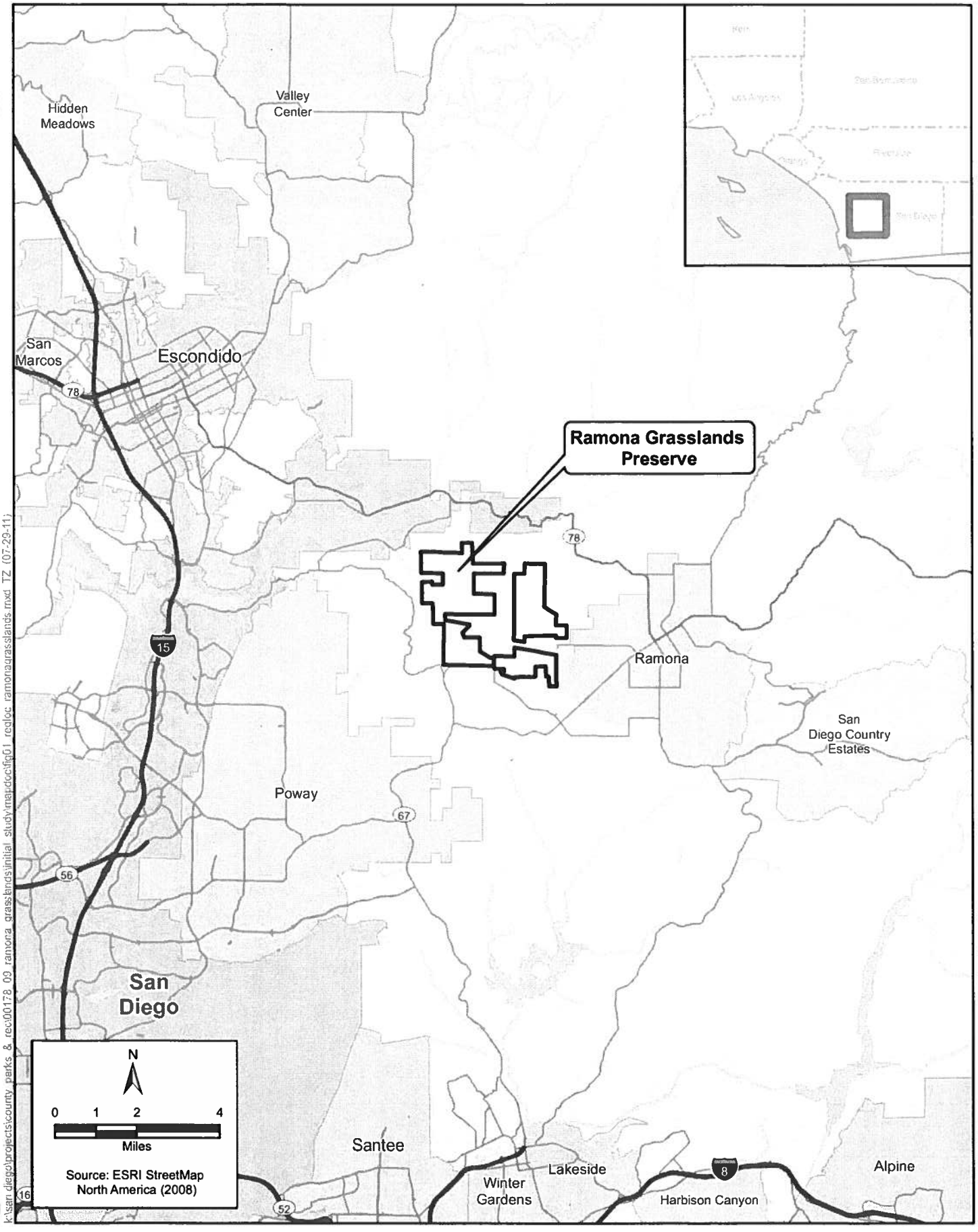


Signature

Feb 4, 2013
Date

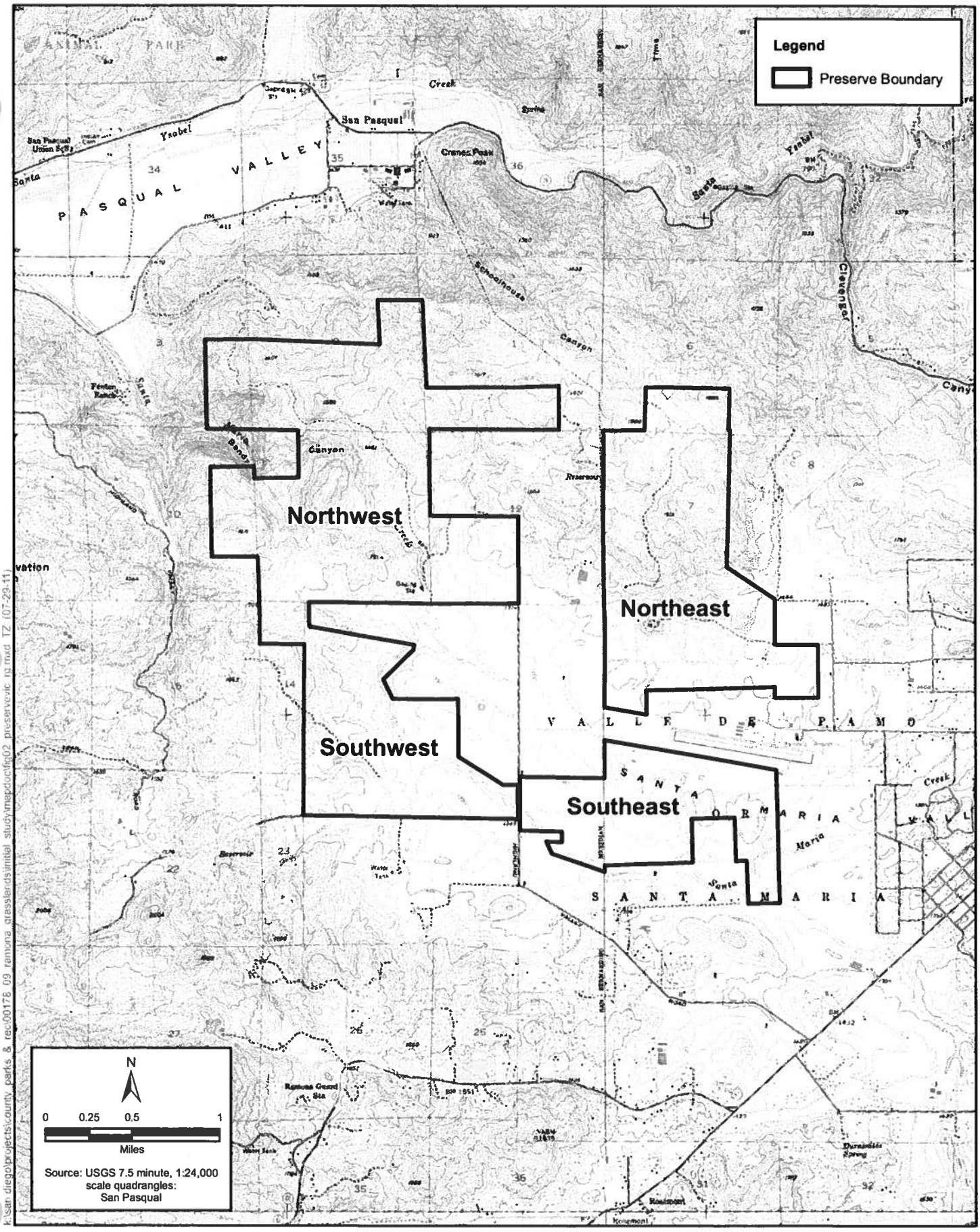
Megan Hamilton
Printed Name

Group Program Manager
Title



ICF INTERNATIONAL

Figure 1
Regional Location
Initial Study for Ramona Grasslands Preserve Project



k:\san diego\projects\county_parks & rec\00178_09 ramona_grasslands\initial study\mxd\doc\fig02 preservevic ng.mxd TZ (07-29-11)

ICF INTERNATIONAL

Figure 2
Preserve Vicinity
Initial Study for Ramona Grasslands Preserve Project

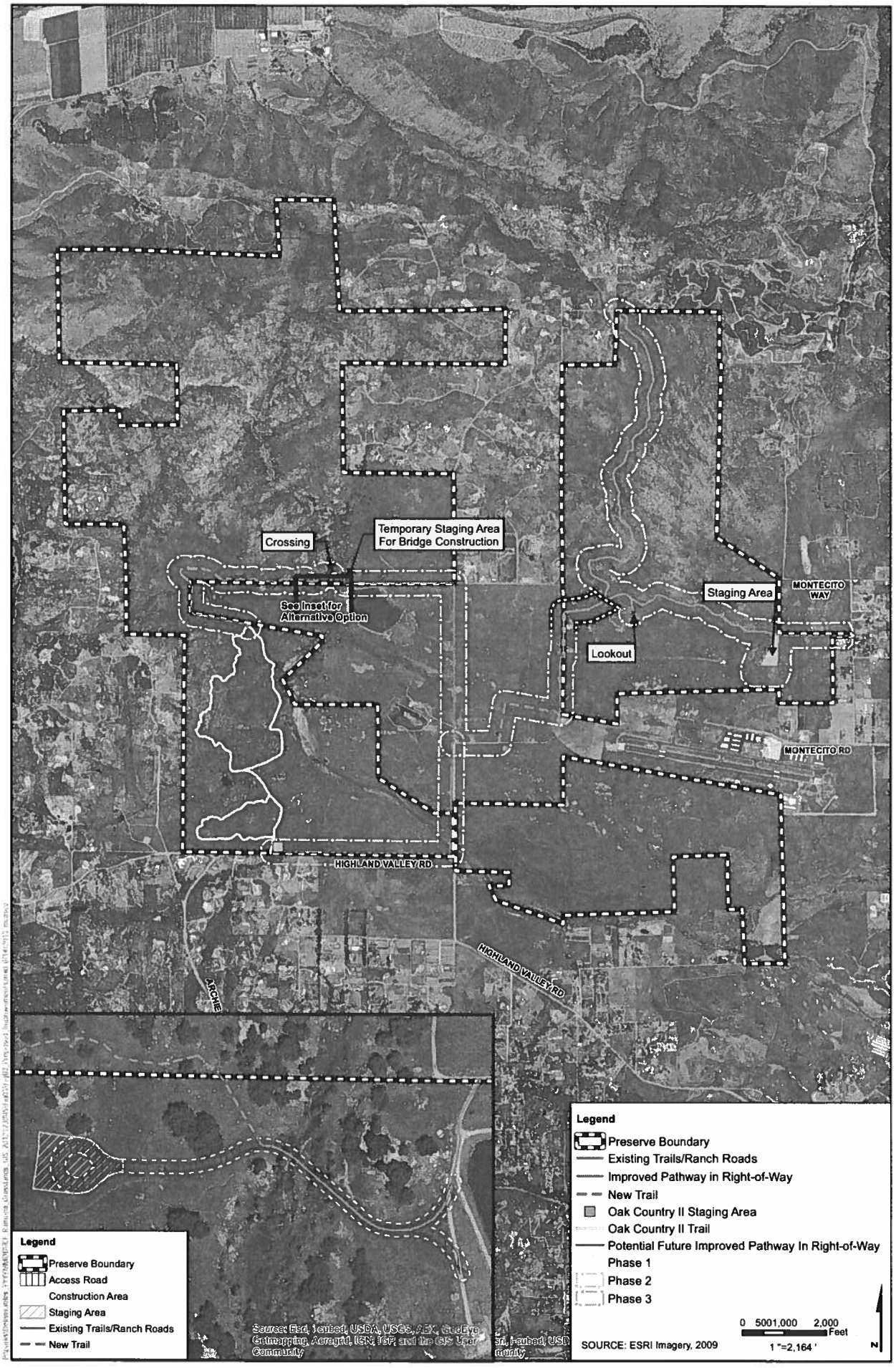


Figure 3
Revised Proposed Trails and Infrastructure Improvements
Initial Study for the Ramona Grasslands Preserve Project

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. 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.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts on individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact on a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

Less than Significant Impact: The proposed project is located near or within the viewshed of a scenic vista. The viewshed and visible components of the landscape within the viewshed, including the underlying landform and overlaying land cover, establish the visual environment for the scenic vista. The visual environment of the subject scenic vista extends across the Santa Maria Valley from Santa Maria Creek to the north and from Montecito Way to the west. The project site comprises a broad basin surrounded by gentle hills and rocky rises vegetated with grasslands, coastal sage scrub, chaparral, and oak woodlands. Santa Maria Creek generally parallels the project site's southern and western boundary, entering the southeast corner of the property, near the intersection of Sawday Street and Howell Street.

The project site itself is partially developed with two existing residences, a barn structure, fences, gates, and non-designated dirt trails. Also, areas to the north, south, east, and west are developed with single-family residences. Other surrounding properties include RMWD land, which is located east and west of Rangeland Road and is bordered by the project site to the north, south, east, and west. The Ramona Airport exists east of Rangeland Road and borders the project site to the north and south. Other areas around the periphery of the project site are used for dry farming, and small citrus and avocado orchards. Additionally, two new residential communities (Montecito Ranch and Cumming Ranch) are planned adjacent to the project site, both including open space areas adjacent to the Preserve that are proposed to be conserved as project mitigation.

Implementation of RMP and VMP Management Directives

Habitat restoration, invasive species control, and fire control/threat reduction activities would result in a visually altered landscape. Habitats in this locations may be thinned, mowed, or replanted, and would appear less densely vegetated than adjacent unaltered habitats. In most instances, this visual condition would be temporary and minor as planted materials and existing native vegetation grow and fill in treated areas. Fuel modification zones adjacent to existing residential development or habitable onsite structures would be permanently maintained at a reduced density of shrubby woody plants; however, these areas would still be vegetated; while maintained at a reduced density, native shrubby woody plants would be left in place and not replaced with species nonnative to the Preserve. None of these circumstances would alter the landscape in such a way as to result in a substantial adverse effect on a scenic vista as native vegetation would remain or be replaced, and no blockages of views would result.

Multi-Use Trail System

The project would develop a multi-use trail system through ~~the rocky hilly terrain in the northwestern portion of the project site and~~ rolling hilly terrain predominantly consisting of grassland and rock outcrops in the ~~southeastern~~ northeastern portion of the project site. A small bridge crossing over Santa Maria Creek would also be constructed in the northwest portion. The trail system would consist of existing dirt ranch roads and newly constructed trails that would connect the existing trail segments together~~, ultimately offering trail access throughout the entire project site~~. Additional amenities would include trail signage and trailhead informational kiosks. Neither the bridge nor the new trails would be highly visible or detract from the scenic quality of the Preserve due to the presence and visual dominance of surrounding vegetation; therefore, the multi-use trail system would not result in substantial adverse effect on a scenic vista.

Northeast Portion Infrastructure Improvements

~~The proposed new ranger station/interpretive facility would either be located in the renovated vacant residence or in a new replacement building of comparable size and scale to the existing onsite residence.~~ The proposed new maintenance building would be smaller in size than the existing barn structure it would replace. The staging area ~~east of the ranger station/interpretive facility~~, which would include parking, hitching rails, informational kiosks, trash receptacles, bathrooms, and picnic tables or benches, would be located directly east of the existing house located southwest of an unpaved road extending west from Montecito Way ~~proposed ranger station~~ and would not block scenic views to the hills. The ~~riding arena,~~

volunteer pads~~, and the primitive amphitheatre~~ are proposed in the vicinity of the staging area ~~and proposed ranger station~~ and also would not block scenic views to the hills.

Although the viewing pavilion/visitor's kiosk would be constructed on a hill in the northeastern portion of the project site, it would consist of a platform structure with a semi-shaded trellis and would be in the vicinity of the existing vacant onsite residence on the hill; thus, it would not obstruct existing views of the hillside.

These structural improvements would be low-density, low-scale developments that would be comparable in size and scale to the existing onsite residences and barn as well as surrounding development. Thus, none of the new buildings or structures would have the vertical height or horizontal mass to obscure scenic views of the nearby or distant hillsides.

The proposed project is compatible with the existing visual environment in terms of visual character and quality for the following reasons: (1) habitat restoration, fire control/threat reduction measures, and construction of the staging areas, trails, ~~buildings,~~ and structures would not result in a substantial modification of the existing landform, substantial amounts of grading, or the creation of visually prominent cut and fill slopes, and (2) no substantial blockage of views would result from the construction of the staging area, trails, buildings, or structures. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans-California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. There are no scenic highways designated within the vicinity of the project site. Therefore, the proposed project would not have any substantial adverse effect on a scenic resource within a State scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers. The existing visual character and quality of the project site and surrounding area varies from open space and agricultural lands to spaced rural residential/single-family development with associated barns, fences, and other grazing/agricultural infrastructure as well as industrial uses associated with the Ramona Airport. The northwestern portion of the project site is characterized by rocky hills bisected by Bandy Canyon, through which Santa Maria Creek flows, the southwest area consists of rolling hills with rocky outcrops with areas of oak woodlands and grasslands, the northeast area is characterized by rocky chaparral-covered hillsides and grasslands, and the southeast area consists of rolling hills supporting grassland and rocky outcrops.

Implementation of RMP and VMP Management Directives

Habitat restoration, invasive nonnative species control, and fire control/threat reduction activities would result in a visually altered landscape. Habitats in this locations may be thinned, mowed, or replanted, and would appear less densely vegetated than adjacent unaltered habitats. In most instances, this visual condition would be temporary and minor as planted materials and existing native vegetation grow and fill in treated areas. Fuel modification zones adjacent to existing residential development or habitable onsite structures would be permanently maintained at a reduced density of shrubby woody plants; however, these areas would still be vegetated. None of these circumstances would alter the landscape in such a way as to substantially degrade the existing visual character or quality of the Preserve as native vegetation would remain or be replaced.

Multi-Use Trail System

The project would develop a multi-use trail system through ~~the rocky hilly terrain in the northwestern portion of the project site and~~ rolling hilly terrain

predominantly consisting of grassland and rock outcrops in the ~~southeastern~~ northeastern portion of the project site. A small bridge crossing over Santa Maria Creek would also be constructed in the northwest portion. The trail system would consist of existing dirt ranch roads and newly constructed trails that would connect the existing trail segments together~~, ultimately offering trail access throughout the entire project site~~. Additional amenities would include trail signage and trailhead informational kiosks. Neither the bridge nor the new trails would be highly visible and would not affect the visual character or quality of the project area due to the presence and visual dominance of surrounding vegetation.

Northeast Portion Infrastructure Improvements

~~The proposed new ranger station/interpretive facility would either be located in the renovated vacant residence or in a new replacement building of comparable size and scale to the existing onsite residence.~~ The proposed new maintenance building would be smaller in size than the existing barn structure it would replace. The staging area ~~east of the ranger station/interpretive facility~~, which would include parking, hitching rails, informational kiosks, trash receptacles, bathrooms, and picnic tables or benches, would be located directly east of the existing house located southwest of an unpaved road extending west from Montecito Way ~~proposed ranger station~~ and would be compatible with the visual character and quality of the project area. The ~~riding arena,~~ volunteer pads~~, and the primitive amphitheatre~~ are proposed in the vicinity of the staging area ~~and proposed ranger station~~ and also would be compatible with the visual character and quality of the project area.

Although the viewing pavilion/visitor's kiosk would be constructed on a hill in the northeastern portion of the project site, it would consist of a platform structure with a semi-shaded trellis and would be in the vicinity of the existing vacant onsite residence on the hill; thus, it would not substantially degrade the visual character or quality of the project area.

These structural improvements would be low-density, low-scale developments that would be comparable in size and scale to the existing onsite residences and barn as well as surrounding development. Thus, none of the new buildings or structures would have the vertical height or horizontal mass to substantially alter the existing visual character of the surrounding project area.

The proposed project is compatible with the existing visual environment's visual character and quality for the following reasons: (1) habitat restoration, fire control/threat reduction measures, and construction of the staging areas, trails, buildings, and structures would not result in a substantial modification of the existing landform, substantial amounts of grading, or the creation of

visually prominent cut and fill slopes; (2) no blockage of views would result from the construction of the staging area, trails, buildings, or structures; (3) the project is being developed in an area that has previously undergone development of structures that are similar in character, size, and scale to those proposed by the project; and (4) the project would be compatible with the existing visual character of the site and surrounding area, which varies from open space and agricultural lands to spaced rural residential/single-family development to industrial use.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact:

Northeast Portion Infrastructure Improvements

The proposed project would use outdoor security motion-sensor lighting near the ~~ranger station and~~ maintenance building, and the project is located within Zone B as identified by the San Diego County Light Pollution Code. However, it would not adversely affect nighttime views or astronomical observations because the project would conform to the Light Pollution Code (Section 59.101-59.115), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1) The project will not install outdoor lighting that directly illuminates neighboring properties.
2) The project will not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist, or pedestrian.
3) The project will not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4) The project will not install any highly reflective surfaces such as glare-producing glass or high-gloss surface color that will be visible along

roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The project will not contribute to significant impacts on day or nighttime views because the project will conform to the Light Pollution Code. The Code was developed by the San Diego County Department of Planning and Land Use and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project area consists of lands designated as Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land. However, based on the historic use, climate, water cost, and soil constraints within the project area, the potential future use of the Preserve is limited to grazing. A majority of the project site has been used for cattle grazing in the past and this agricultural use would continue to be allowed on site in accordance with the revised grazing plan requirements, outlined in the RMP and VMP. The construction of the proposed project would not have significant adverse project level impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use because none of the existing agricultural uses in the valley or onsite would be displaced nor would future agricultural uses be precluded as a result of construction and use of the proposed facilities and trails. Therefore, no potentially significant project level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use would occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: A portion of the project site is zoned A70, which is considered to be an agricultural zone. However, based on the historic use, climate, water cost, and soil constraints, the potential future use is limited to grazing. A majority of the project site has been used for cattle grazing in the past and this agricultural use would continue to be allowed on site in accordance with the revised grazing plan requirements, outlined in the RMP and VMP. The proposed project would not result in a conflict in zoning for agricultural use because none of the existing agricultural uses in the valley or onsite would be displaced nor would future agricultural uses be precluded as a result of construction and use of the proposed facilities and trails. Additionally, the project area does not consist of land under a Williamson Act contract. Therefore, there would be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project area does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with the zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project area does not contain forest lands defined in Public Resources Code Section 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project area contains land designated as Important Farmland; however, the proposed project would not result in significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use because none of the existing agricultural uses in the valley or onsite would be displaced nor would future agricultural uses in the valley or onsite be precluded as a result of construction and use of the proposed facilities and trails. Therefore, no potentially significant conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use would occur as a result of this project.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes development that was anticipated in SANDAG growth projections used in development of the RAQS

and SIP. The project anticipates an increase in visitors, which would result in an increase in vehicle trips to the Preserve. However, operation of the project would result in emissions of ozone precursors that were considered as part of the RAQS based on growth projections. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, and subsequently would not violate ambient air quality standards.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

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

Less than Significant Impact: Construction of the project would entail minimal grading; however, grading operations associated with the construction of the project would be subject to the County of San Diego Grading Ordinance which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the LUEG guidelines for determining significance. In addition, the vehicle trips generated from the project will result in 156 Average Daily Trips (ADTs). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the guidelines for criteria pollutants. As such, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O_3). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM_{10}) under the CAAQS. O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less than Significant Impact: Air quality emissions associated with the project include emissions of PM_{10}, NO_x and VOCs from construction/grading activities, and also as the result of increase of visitor traffic from project implementation. However, grading on site would be minimal and grading operations associated with the construction of the project would be subject to the County of San Diego Grading Ordinance which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, localized and temporary resulting in PM_{10} and VOC emissions below the screening-level criteria established by the LUEG guidelines for determining significance. The vehicle trips generated from the project will result in 156 ADT. According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the LUEG guidelines for determining significance.

In addition, a list of past, present and future projects within the surrounding area were evaluated (Refer to XVIII. Mandatory Findings of Significance) and none of these projects emit significant amounts of criteria pollutants. The proposed project as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria

established by the LUEG guidelines for determining significance, therefore, the construction and operational emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM10, or any O_3 precursors.

d) Expose sensitive receptors to substantial pollutant concentrations?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less than Significant Impact: Residential development has been identified within a quarter-mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed project. However, this project does not propose uses or activities that would result in exposure of these identified sensitive receptors to significant pollutant concentrations and would not place sensitive receptors near carbon monoxide hotspots. In addition, the project would not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project as well as the listed projects have emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

e) Create objectionable odors affecting a substantial number of people?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: No potential sources of objectionable odors have been identified in association with the proposed project. As such, no impact from odors is anticipated.

IV. BIOLOGICAL RESOURCES -- Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on an analysis of the California Natural Diversity Database (CNDDB 2009), the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and the Biological Resources Report for the Ramona Grasslands Preserve Project (provided as an attachment to this report), dated November 2011, prepared by ICF International, the approximately 3,490-acre site supports native and naturalized habitats including eucalyptus woodland (16.10 acres), nonnative woodland (1.02 acres), disturbed habitat (23.88 acres), developed lands (1.50 acres), open water (0.84 acre), agriculture (17.88 acres), Diegan coastal sage scrub (151.02 acres), disturbed coastal sage scrub (47.97 acres), coastal sage-chaparral scrub (201.34 acres), southern mixed chaparral (1,228.11 acres), disturbed southern mixed chaparral (157.80 acres), chamise chaparral (18.81 acres), scrub oak chaparral (57.80 acres), valley needlegrass grassland (~~8.16~~14.22 acres), saltgrass grassland (15.~~45~~63 acres), nonnative grassland (1,3~~67.55~~74.6~~996.38~~ acres), alkali marsh (8.81 acres), emergent wetland (0.84 acre), disturbed wetland (0.81 acre), non-vegetated channel (0.35 acre), southern coast live oak riparian forest (9.37 acres), mule fat scrub (23.26 acres), southern willow scrub (14.26 acres), open coast live oak woodland (20.58 acres), and dense coast live oak woodland (82.13 acres).

Potential Impacts

Special-Status Plant Species

Special-status plant species detected include ashy spike-moss (*Selaginella cinerascens*), San Diego thornmint (*Acanthominta ilicifolia*), California adder's tongue (*Ophioglossum californicum),* southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), Coulter's saltbush (*Atriplex coulteri*), Parish's brittlescale (*Atriplex parishii* var. *parishii*), southern tarplant (*Centromadia parryi* ssp. *australis*), Palmer's sagewort (*Artemisia palmeri*), graceful tarplant (*Holocarpha virgata* ssp. *elongata*), rush chaparral-star (*Xanthisma junceum*), field bindweed (*Convolvulus simulans*), San Diego milkvetch (*Astragalus*

oocarpus), Engelmann oak (*Quercus engelmannii*), California large-leaf filaree (*California macrophylla*), vernal barely (*Hordeum intercedens*), and Ramona spineflower (*Chorizanthe leptotheca*). Of these, San Diego thornmint is federally-listed as threatened, state-listed as endangered, and a County List A plant species. The following plant species are County List A or B plant species: Coulter's saltbush, Parish's brittlescale, southern tarplant, San Diego milkvetch, and California large-leaf filaree. The following plant species are County List C or D plant species: ashy spike-moss, California adder's tongue, southwestern spiny rush, Palmer's sagewort, graceful tarplant, rush chaparral-star, small-flower bindweed, Engelmann oak, vernal barley, and Ramona spineflower.

Although not detected, spreading navarretia (*Navarretia fossalis*) has a high potential to occur and the NE corner of the SE portion of the Preserve is designated critical habitat for this species. There are no direct or indirect impacts on spreading navarretia critical habitat as discussed further below.

Specific measures implemented under the RMP and VMP (such as nonnative plant removal, habitat restoration, continued grazing, and fire management activities) may result in ground disturbance and as such, could result in impacts on listed plants species; however, such impacts would not be considered significant as these plans focus on the preservation and long-term maintenance and management of approximately 3,490 acres within the Preserve which would benefit special-status plant species and contribute to their long-term survival. Additionally, biological monitors would be utilized during nonnative plant removal and habitat restoration activities to ensure impacts on listed species are avoided.

Construction of the new trail segments within the Preserve would not result in direct impacts on special-status plant species as none were observed within these proposed impact areas during any of the surveys conducted at the Preserve. Trails have been designed such that they are not subject to erosion. Although not anticipated, future re-routing of trail sections to avoid areas subject to erosion would result in ground disturbance. However, potential direct impacts on special-status plant species would not occur as a result of such activities as trails would be re-routed to the least environmentally sensitive areas and would avoid previously surveyed populations of special-status plant species.

Focused surveys for special-status plant species were not conducted outside of the identified Preserve boundaries, including within the impact area of the proposed new trail section to be constructed east of Rangeland Road and west of the Ramona Airport, the proposed pathways along the west side of Rangeland Road and the north side of Highland Valley Road, and within the impact area of the proposed new trail section that would be required if the alternative crossing of Santa Maria Creek on the RMWD property is utilized.

As potentially suitable habitat for special-status plant species occurs along the proposed new off-site trail segment near the Ramona Airport and the potential new off-site trail segment on the RMWD property, the construction and maintenance of these segments have the potential to result in impacts on special-status plant species, if found to occur within the proposed footprint. Potential impacts on special-status plant species resulting from the project would be mitigated to a less-than-significant level through the completion of focused surveys (where necessary) and the presence of a biological monitor during trail construction and major maintenance activities to ensure avoidance.

In addition, construction of the staging area in the NE portion of the Preserve would result in impacts on five (5) individuals of southern tarplant, a County List A species. An impact on five (5) individuals of southern tarplant does not represent a significant loss of the population of the plant species on the Preserve and; therefore, no mitigation is necessary.

Indirect impacts on federally or state-listed plant species or critical habitat during construction of new trail segments or as a result in trail usage are not anticipated to occur as listed plant species observed within the Preserve were limited to approximately 30 individuals of San Diego thornmint which were observed within the SE portion of the Preserve, more than 500 feet away from any proposed trails or associated facilities/improvements. Also, indirect impacts on County List A and/or B plant species during construction of new trail segments or as a result of trail usage are not anticipated to occur to County List A and B plant species observed within the Preserve. All County List A and B plant species observed within the Preserve occur a minimum of 100 feet away from proposed trails or associated facilities/improvements (with the exception of individuals discussed above that would be directly impacted).

Special-Status Wildlife Species

In total, 41 special-status wildlife species were detected during the 2009 and 2010 surveys at the Preserve. One special-status invertebrate, San Diego fairy shrimp (*Branchibecta sandiegonensis*), is known to occur in the vernal pools in the SE portion and in the SW portion of the Preserve. Two special-status amphibian species were detected and include arroyo toad (*Bufo californicus*) and western spadefoot (*Spea hammondii*). Seven special-status reptile species were detected and include San Diego horned lizard (*Phyrnosoma coronatum blainvillii*), Coronado skink (*Eumeces skiltonianus interparietalis*), Belding's orange-throated whiptail (*Cnemidophorus hyperythrus beldingi*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), coastal rosy boa (*Charina trivirgata roseofusca*), two-striped garter snake (*Thamnophis hammondii hammondii*), and northern red diamond rattlesnake (*Crotalus ruber ruber*). Sixteen special-status bird species were detected and include great blue heron (*Ardea herodias*), turkey vulture

(*Cathartes aura*), Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), ferruginous hawk (*Buteo regalis*), golden eagle (*Aquila chrysaetos*), barn owl (*Tyto alba*), burrowing owl (*Athene cunicularia*), vermillion flycatcher (*Pyrocephalus rubinus*), loggerhead shrike (*Lanius ludovicianus*), California horned lark (*Eremophila alpestris actia*), western bluebird (*Sialia mexicana*), yellow warbler (*Dendroica petechia*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), grasshopper sparrow (*Ammodramus savannarum*), and tricolored blackbird (*Agelaius tricolor*). Fifteen special-status mammal species were detected and include small-footed myotis (*Myotis ciliolabrum*), long-eared myotis (*Myotis evotis*), Yuma myotis (*Myotis yumanensis*), western red bat (*Lasiurus blossevillii*), western yellow bat (*Lasiurus xanthinus*), Townsend's big-eared bat (*Corynorhinus townsendii*), pallid bat (*Antrozous pallidus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), big free-tailed bat (*Nyctinomops macrotis*), western mastiff bat (*Eumops perotis*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), Stephens' kangaroo rat (*Dipodomys stephensi*), San Diego desert woodrat (*Neotoma lepida intermedia*), and southern mule deer (*Odocoileus hemionus fuliginata*).

Specific measures implemented under the RMP and VMP (such as continued grazing, nonnative plant species removal, and vegetation management) could result in ground disturbance and impacts on suitable/ occupied habitat for special-status wildlife species; however, impacts would be minimal and would not have a substantial adverse effect on special-status wildlife species as these plans focus on the preservation and long-term maintenance and management of approximately 3,490 acres within the Preserve which would benefit special-status wildlife species and their habitats, contributing to their long-term survival.

San Diego fairy shrimp occur within the Preserve but not in the vicinity of proposed new trails or associated improvements/facilities. Critical habitat for the species extends on the SW and SE portions of the Preserve. The proposed establishment, maintenance, and management of the Preserve would protect vernal pools and known populations of San Diego fairy shrimp thus there are no direct or indirect negative impacts on this species or its critical habitat.

Construction of the new trail segment across Santa Maria Creek in the NW portion of the Preserve and the new potential off-site trail segment required if the alternative crossing of Santa Maria Creek on the RMWD property is utilized have the potential to result in direct impacts on arroyo toad as these areas provide potentially suitable habitat for this federally listed species, which was observed upstream and downstream of these areas. In addition, trail maintenance activities within the vicinity of suitable/occupied toad (critical) habitat have the potential to result in impacts on the arroyo toad.

Approximately 1.24 acres of suitable arroyo toad aestivation upland habitat (0.38 acre within the proposed east-west trail alignment at the proposed crossing of Santa Maria Creek and 0.86 acre within the temporary staging area) and 0.008 acre of breeding wetland/riparian habitat (within the footprint of the dry weather crossing) would be directly affected by the project. If the alternative Santa Maria Creek crossing on the RMWD property is utilized, the project's impact on arroyo toad habitat would be reduced to 0.37 acre of suitable aestivation upland habitat (0.34 acre within the proposed on-site east-west trail alignment at the proposed crossing of Santa Maria Creek and 0.03 acre within the potential off-site section within the RMWD property). Impacts on arroyo toad would be reduced to a less-than-significant level through construction avoidance of the breeding season, trash, and dust control practices, and the use of exclusionary fencing and open pit coverings to prevent entrapment and/or direct loss of arroyo toads during construction.

Indirect impacts on the arroyo toad associated with trail use are not expected as this species is primarily active at night when the trail system within the Preserve will be closed to the public.

Stephens' kangaroo rats were observed along the Oak Country II trail in the SW portion of the Preserve as well as within the southwestern corner of the NE portion of the Preserve. In addition, most of the grasslands within the Preserve are considered suitable habitat for this species. The construction and maintenance of trails/staging areas and the mowing of 0.5 acre associated with the proposed emergency evacuation road in the vicinity of these areas have the potential to result in direct and indirect impacts on Stephens' kangaroo rat. Potential impacts on Stephens' kangaroo rat resulting from the project would be mitigated to a less-than-significant level through the completion of focused surveys (where necessary) and the presence of a biological monitor during trail/staging area construction and major maintenance activities to ensure avoidance of occupied burrows. Mowing the 0.5 acre area with a flail mower is expected to enhance the habitat for the SKR, while avoiding impacts on the species.

Indirect impacts on Stephens' kangaroo rat associated with trail use are not expected as this species is only active at night when the trail system within the Preserve will be closed to the public.

Focused surveys for special-status wildlife species were not conducted outside of the identified Preserve boundaries, including within the impact area of the proposed new trail section to be constructed east of Rangeland Road and west of the Ramona Airport, the proposed pathway along the west side of a portion of Rangeland Road, and the impact area of the proposed new trail section that would be required if the alternative crossing of Santa Maria Creek on the RMWD property is utilized. Impacts associated with the proposed pathway along Rangeland Road would occur within the County-maintained

right-of-way; therefore, impacts on special-status wildlife species are not anticipated to occur as a result of construction of this pathway.

As potentially suitable habitat for special-status wildlife species occurs along the proposed new off-site trail segment (4-feet wide by approximately 2,300 feet-long) near the Ramona Airport and the potential new off-site trail segment on the RMWD property, the construction and maintenance of these segments have the potential to result in impacts on special-status wildlife species, particularly those listed as federally or state endangered or threatened, if found to occur in the proposed impact area. Potential impacts on special-status wildlife species resulting from off-site trail construction would be mitigated to a less-than-significant level through the completion of a habitat assessment, focused surveys (where necessary), and the presence of a biological monitor during trail construction and major maintenance activities to ensure avoidance of direct impacts.

Raptors such as the red-shouldered hawk, Cooper's hawk, ferruginous hawk, turkey vulture, and golden eagle were observed or are known to forage in the grasslands on the Preserve. There are three nesting territories nearby including the San Pasqual pair (within MSCP) and the Mt. Woodson territory (outside MSCP). While approximately 6.27 acres of foraging habitat and potential courtship areas (nonnative grassland) would be directly impacted by the project, the remainder of the nonnative grasslands within the Preserve (over 1,400 acres) would be available for foraging and mating. This represents a loss of less than 1 percent of the foraging/courtship habitat in the Preserve. Thus, impacts on foraging/courtship habitat are minimal and will not affect foraging/courtship behavior of nesting eagles in the vicinity of the Preserve. In addition, implementation measures outlined in the RMP will provide additional protections for raptors, including ~~potential seasonal closure of trail sections within the Preserve, including sections~~ only periodic docent-led tours within the NW portion of the Preserve where high levels of raptor usage have been observed. As such, the project is not anticipated to result in impacts on the nesting success of the golden eagle in this portion of the Preserve. However, the project could impact the nesting success of tree and/or ground-nesting raptors if grading, clearing, or other noise generating construction activities would occur during their breeding season, defined as January 15 to July 15 and February 1 to July 31, respectively. Potential impacts on nesting birds/raptors will be avoided through prohibiting clearing or grading during the breeding season or completing pre-construction nesting bird surveys prior to project activities to ensure active nests are avoided.

While the proposed trails utilize existing roads/trails to the extent feasible and avoid rock outcrops, oak trees, and other features commonly used by raptors, trail use has the potential to result in indirect impacts on raptors. For example, if the species is continuously flushed and resting and foraging is disrupted. Such impacts would be reduced to less than significant through

implementation of seasonal closures (as necessary), development and implementation of passive restoration of abandoned trails and other areas that may encourage off-trail activities, educational signage and ranger presence, continued maintenance to control the spread of invasive species within the Preserve and enhance foraging habitat within the Preserve.

The coastal cactus wren was not detected within the Preserve during biological surveys performed in 2009 and suitable habitat for this species does not occur within the Preserve. Therefore, the project would not impact the nesting success of this species.

The following sensitive bird species were not observed within the Preserve; however, the Preserve provides potentially suitable habitat for these species: coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, and light-footed clapper rail. The NW and NE portions of the Preserve support designated critical habitat for the gnatcatcher. No new trails or infrastructure would occur within ~~Within the NE portion of the Preserve, a total of 0.16 acre of~~ California gnatcatcher critical habitat ~~will be impacted as a result of the construction of the realigned section of the existing north-south trail~~. The project includes the implementation of the RMP and VMP, which involve long-term maintenance and adaptive management of the entire Preserve and include management directives that would benefit species known to occur within the Preserve and species that may be detected during on-going monitoring efforts. Therefore, the project would not impact nesting success of the species listed above.

Sensitive Habitats

See section IV.b. for a discussion of project impacts on sensitive habitat communities.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☑	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on the Biological Resources Report for the Ramona Grasslands Preserve Project, dated November 2011, prepared by ICF International, it has been determined that the project site contains riparian habitat and other sensitive natural

communities including nonnative grassland, open coast live oak woodland, disturbed wetland, non-vegetated channel, southern mixed chaparral, coastal sage-chaparral scrub, and disturbed coastal sage scrub.

Existing roads and trails to become part of the proposed multi-use trail network would not result in impacts on riparian habitat or sensitive natural communities; impacts would be limited to existing disturbed/developed areas. In addition, the proposed 0.07-mile pathway along the west side of Rangeland Road would not result in impacts on riparian habitat or sensitive natural communities; impacts would be limited to existing disturbed/developed areas.

Construction of the new trail segments in the NW ~~and NE~~ portion~~s~~ of the Preserve; a dry weather crossing of Santa Maria Creek in the NW portion; temporary construction staging area in the NW portion; a new off-site trail to connect the NE portion of the Preserve to Rangeland Road; the staging area in the NE portion; and other project infrastructure would directly result in impacts on the following sensitive native and naturalized habitats: nonnative grassland (6.27 acres), open coast live oak woodland (0.08 acre), disturbed wetland (0.006 acre), non-vegetated channel (0.002 acre), and southern mixed chaparral (0.11 acre~~), coastal sage-chaparral scrub (0.03 acre), and disturbed coastal sage scrub (0.13 acre)~~. If the alternative crossing of Santa Maria Creek on the RMWD property is utilized, impacts on native or naturalized vegetation communities would be reduced from 6.~~63~~ 47 acres to a total of 5.~~76~~ 60 acres: 5.43 acres of nonnative grassland, 0.07 acre of open coast live oak woodland, and 0.10 acre of southern mixed chaparral~~, 0.03 acre of coastal sage-chaparral scrub, and 0.13 acre of disturbed coastal sage scrub~~. In addition, while not anticipated as trails have been designed such that they are not subject to erosion, the potential future re-routing of trail section to avoid areas subject to erosion, could result in impacts on sensitive natural communities. Off-site habitat preservation or mitigation credit purchases at established ratios would reduce these impacts to a less-than-significant level.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: The project site contains federally protected wetlands defined by Section 404 of the Clean

Water Act, including Santa Maria Creek, tributaries to Santa Maria Creek, and associated riparian habitats such as southern willow scrub and disturbed wetlands. A formal wetland delineation was conducted for the proposed project and results are detailed in the report titled *Jurisdictional Delineation Report for the Ramona Grasslands Preserve Project* prepared by ICF International, dated August 2011 (provided as an attachment to this report).

The Preserve occupies a significant portion of the Santa Maria Creek subbasin of the San Dieguito River watershed. Santa Maria Creek and its tributaries drain from the mountains east of Ramona, across the Preserve, and through Bandy Canyon to its confluence with Santa Ysabel Creek. Below this confluence, the San Dieguito River flows into Lake Hodges.

The section of Santa Maria Creek evaluated during the jurisdictional delineation was determined to be a perennial wetland water of the U.S. and the adjacent floodplain was determined to be disturbed wetlands, all under the joint jurisdiction of USACE, CDFG, and RWQCB.

Three drainage features were identified along Old Survey Road that were determined to be non-wetland waters under the joint jurisdiction of USACE, CDFG, and RWQCB. The first one (Drainage 1) is located just northeast of the proposed crossing of Santa Maria Creek, the second (Drainage 2) is located approximately 1,000 feet north of the proposed crossing, and the third (Drainage 3) is located approximately 4,000 feet north of the proposed crossing. Drainages 1 and 2 cross under Old Survey Road via existing culverts and the actual roadbed would, therefore, not fall under the jurisdictional of USACE, RWQCB, or CDFG. Drainage 3 crosses a section of Old Survey Road that has not been actively maintained. The drainage channel supports a mesic vegetation community, which is evidence that water intermittently flows through this channel; no culvert exists at this location.

The proposed project has been designed to avoid and minimize impacts on jurisdictional wetlands/waters and associated buffers. However, the proposed dry weather crossing of Santa Maria Creek in the NW portion of the Preserve would result in direct impacts on 0.008 acre of jurisdictional wetland waters of the U.S./State and CDFG. Use of the alternative crossing of Santa Maria Creek on the RMWD property would not result in impacts on jurisdictional resources as this potion would only be utilized, with permission from the RMWD, after RMWD constructs the crossing.

~~Construction and m~~Maintenance of the ~~proposed~~ existing ranch road/trail along Old Survey Road would result in impacts on 18 square feet (0.0004 acre) of Drainage 3, which would be regulated as a non-wetland WofUS and 36 square feet regulated as a CDFG streambed. However, potential impacts are smaller than standard mapping units and no mitigation is proposed. Additionally, this area will only be used periodically for docent-led hikes

Construction of other related improvements (picnic areas, staging area, etc.) and implementation of the RMP and VMP are not expected to result in direct impacts on jurisdictional waters.

Portions of the southern approximately 0.50-mile segment of the proposed pathway along the west side of Rangeland Road and of the pathway along Highland Valley Road, if constructed, have the potential to result in impacts on jurisdictional waters. The southern portion of the pathway along Rangeland Road would cross the Santa Maria Creek. In addition, several culverts existing along the west side of Rangeland Road, which could be impacted.

Grazing currently occurs within the Preserve. The entire Santa Maria Creek and a variable buffer within the SW portion of the preserve (south of the RMWD property) has been fenced to exclude cattle grazing and to allow for passive restoration of riparian habitat in accordance with State Water Resources Control Board grant specification. Santa Maria Creek in the NW portion of the Preserve is not fenced. Much of the topography including rocky outcrops does not make fencing in this area feasible. Additionally, only a total of 10 bulls graze the NW portion of the Preserve between late June and November each year. A water source is located close to their enclosure and they do not utilize the creek for water. This low level of continued grazing as part of the proposed project, when considered along with implementation of the management directives identified in the RMP and VMP that would both protect and increase the functions and values of existing wetlands within the Preserve, would not result in significant impacts on wetlands or wetland buffers.

Jurisdictional impacts would be reduced to a less-than-significant level through (1) acquisition of permits from the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Game, (2) the preservation of the remaining portions of Santa Maria Creek located within the Preserve, and (3) off-site restoration and/or enhancement; the details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with USACE, CDFG, and RWQCB.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of the California Natural Diversity Database (CNDDB 2009), the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and the Biological Resources Report for the Ramona Grasslands Preserve Project, dated November 2011, prepared by ICF International, it has been determined that impedance of the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the proposed project for the following reasons:

The Preserve is identified within the North County ~~MSCP~~ Plan as a core habitat area (Ramona Grasslands Core - Area 13) and a linkage that connects San Pasqual Valley to the north and with Barnett Ranch and Iron Mountain preserve areas to the south. The Preserve serves as an important corridor for wildlife movement between these areas. The major wildlife movement feature located within the Preserve is Santa Maria Creek. Santa Maria Creek provides access and concealment to wildlife species of all sizes. Larger mammals such as coyotes regularly move on, off of, and across the Preserve, to and from adjacent open space. There is a box culvert under Rangeland Road that connects the two southern areas. In 2009, numerous mammal species were documented utilizing this crossing including striped skunk, coyote, long-tailed weasel, and Virginia opossum.

It is anticipated that there will be no impacts on wildlife corridors, linkages, and nursery sites. The proposed project area consists of the approximately 3,490-acre Preserve and the project includes implementation of the RMP and VMP and only minimal new trail sections and associated facilities/ improvements. The proposed project is not likely to disrupt wildlife movement because no new buildings or other obtrusive objects are expected that would preclude continued wildlife movement within and through the Preserve. In addition, long lines-of-sight will not be obstructed by new development; therefore, wildlife will still be able to pass through the project area without hindrance.

The proposed project would not impact the viability of a core wildlife area. The proposed project has been designed to utilize existing dirt roads/trails for the proposed trail network to the maximum extent feasible. In addition, reuse of existing structures is proposed for associated facilities, such as the ranger station/interpretive center. New trail sections are limited in number and would occur ~~either~~ near the perimeter of the Preserve (e.g., the new trail segment in the NW portion of the Preserve and the proposed pathway along a portion of Rangeland Road) ~~or would replace a section of an existing road/trail (e.g., the new trail segment in the NE portion of the Preserve, which is being realigned to avoid an existing eroded section)~~. Project impacts would be limited to a

total of 6.~~628~~ 468 acres of the approximately 3,490-acre Preserve. In addition, the project involves the implementation of the RMP and VMP, which involve long-term maintenance and adaptive management of the Preserve, and include management directives aimed at increasing the Preserve's overall functions and values, including its function as a core area for wildlife.

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: The majority of the proposed project occurs within the Draft North County ~~MSCP~~ Plan Pre-Approved Mitigation Area (PAMA); the northwestern most portion of the Preserve occurs within the adopted ~~South County~~ MSCP Subarea Plan. The project, which includes implementation of the RMP and VMP, has been designed to be consistent with the goals and requirements of the draft North County ~~MSCP~~ Plan as well as the adopted ~~South County~~ MSCP Subarea Plan. Furthermore, the project has been developed in accordance with standard conservation planning principles. Such principles include preservation of large, contiguous patches of open space; maintaining broad wildlife corridors; and preserving high value habitat types. Additionally, the ~~South County~~ MSCP Subarea Plan identifies anticipated conservation levels for covered species. Table 3-5 states that ~~evaluation of species coverage for~~ golden eagle is covered because ~~states the species is covered because~~ local populations are not critical to, and the Plan will not adversely affect the ~~species~~ long-term survival of this species. Development of the Plan has resulted in less than 20% loss of habitat in San Pasqual nesting territory as evidenced by a cumulative analysis of projects within golden eagle nesting territory (on file with DPR). Thus, in accordance with coverage requirements, nesting territory should remain viable. As such, the project would not preclude or prevent the preparation of a subregional NCCP, including the North County ~~MSCP~~ Plan.

The project is not subject to the RPO, pursuant to Section 86.603, as it does not involve any of the discretionary actions to which the ordinance applies (e.g., Tentative Parcel Maps, Tentative Maps, Major Use Permits, etc.).

The project has been designed to avoid impacts on coastal sage scrub communities located within the Preserve and; therefore, does not conflict with ~~new trail section in the NE portion of the Preserve would result in impacts to 0.03 acre of the 201.34 acres of coastal sage-chaparral scrub located within the Preserve and 0.13 acre of the 47.97 acres of disturbed coastal sage scrub located within the Preserve. Impacts to these vegetation communities have been minimized to the maximum extent practicable. In addition, significant impacts to sensitive natural communities (including coastal sage-chaparral scrub and disturbed coastal sage scrub) would be offset by the off-site preservation of habitat or the purchase of mitigation credits within an approved mitigation bank at established mitigation ratios. Therefore, the project would minimize and mitigate coastal sage scrub loss in accordance with~~ Section 4.3 of the NCCP Guidelines. ~~If the project is implemented subsequent to approval of the Draft North County MSCP, impacts to coastal sage-chaparral scrub and disturbed coastal sage scrub would be authorized and mitigated in accordance with that plan.~~

No significant impacts on Biological Resource Core Areas would occur as a result of project implementation as discussed in Section IV.d. above.

The project area includes the entire Ramona Grasslands Preserve and does connect lands of high value habitat, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines. However, implementation of the project would not preclude connectivity of the various portions of the Preserve (NE, NW, SE, and SW) or to adjacent open space lands. Also, the proposed project includes implementation of the RMP and VMP, which would provide for the long-term management for the benefit of sensitive biological resources, including through the maintenance and enhancement of wildlife movement corridors and linkages.

One ~~MSCP~~ Draft North County Plan narrow endemic plant species, San Diego thornmint, was observed within the NE portion of the Preserve. In addition, approximately 30 individuals of this species occur within the SE portion of the Preserve. Direct impacts on this species are being avoided and indirect impacts are not expected as all individuals are located more than 500 feet away from any proposed trails or associated facilities/improvements.

The following three Draft North County ~~MSCP~~ Plan narrow endemic plant species were observed within the Preserve: Coulter's saltbush, Parish brittlescale, and southern tarplant. Coulter's saltbush and Parish brittlescale are located within the SE portion of the Preserve and more than 1,000 feet away from any proposed trails or associated facilities/improvements. Therefore, direct and indirect impacts on these species are not anticipated.

Construction of the staging area within the NE portion of the Preserve would result in impacts on five (5) individuals of southern tarplant. However, these impacts would not be considered significant as the loss of these individuals represents less than 5% of the population of this species within the Preserve, which would be management and maintained in perpetuity for the benefit of biological resources, including southern tarplant.

The following three MSCP narrow endemic wildlife species were observed on the Preserve: burrowing owl, arroyo toad, and golden eagle. One burrowing owl was incidentally observed within the vicinity of the proposed new trail section that would connect the eastern and western portions of the Preserve; the survey efforts to date have not included areas outside of the identified Preserve boundaries. The construction of this new trail segment and the potential new off-site segment required if the alternative crossing of Santa Maria Creek is utilized have the potential to result in direct and indirect impacts on burrowing owl. Potential impacts on burrowing owls resulting from the project would be mitigated to a less-than-significant level through the completion of focused surveys (where necessary) and the presence of a biological monitor during trail construction and major maintenance activities to ensure avoidance of occupied burrows.

Construction of the dry weather crossing at Santa Maria Creek in the NW portion of the Preserve, the temporary construction staging area associated with construction of a bridge over the Santa Maria Creek, and the potential off-site trail segment required if the alternative crossing of Santa Maria Creek is utilized have the potential to result in direct and indirect impacts on the arroyo toad as these areas provide potentially suitable habitat for this species, which was observed upstream and downstream of the proposed crossing. Impacts on arroyo toad would be reduced to a less-than-significant level through construction avoidance of the breeding season, trash, and dust control practices, and the use of exclusionary fencing and open pit coverings to prevent entrapment and/or direct loss of arroyo toads during construction.

The project would not result in the take of eagles, eagle eggs or any part of an eagle. Eagles are known to nest adjacent to the NW portion of the Preserve, but are not known to nest within the Preserve. A pair of golden eagles is known to nest on cliffs located outside of the Preserve and have been observed foraging at the Preserve. The known nesting site is located ~~half a~~several miles from the nearest existing trail that is proposed to be part of the formal trail network within the Preserve; the closest proposed new trail is located over 4,000 feet from the known eagle nesting location (and is not within sight of the known nesting location). Direct impacts on golden eagles are not anticipated to occur as a result of the proposed project as the known nesting site will be avoided and as impacts on foraging habitat are minimal (6.27 acres of impact on NNG within the approximately 3,490-acre Preserve, which supports over 1,400 acres of grasslands). Increased human and domestic pet presence within the Preserve has the potential to result in indirect impacts on the golden eagle. However,

potential impacts would be avoided through the implementation of specific management directives outlined in the RMP and VMP. Some such directives include closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known nesting location; continued maintenance to control invasive plant species within the Preserve; and the on-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road 97 in the NW portion~~, which could include seasonal closure of trail sections associated with Old Survey Road 97 in the NW portion and/or trail sections within the NE portion of the Preserve where foraging eagles have been frequently observed~~. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known off-site nest locations to determine occupancy during the breeding period (December through June). In addition, DPR will monitor the numbers and types of trail users and identify peak trail usage times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts on golden eagles.

The following two Draft North County ~~MSCP~~ Plan narrow endemic wildlife species were observed within the Preserve: tricolored blackbird and Stephens' kangaroo rat. The tricolored blackbird was detected along Santa Maria Creek within the SE portion of the Preserve, more than 2,000 feet away from any proposed trails or associated infrastructure. Therefore, direct and indirect impacts are not anticipated. Stephens' kangaroo rats were observed along the Oak Country II trail in the SW portion of the Preserve as well as within the southwestern corner of the NE portion of the Preserve. In addition, most of the grasslands within the Preserve are considered suitable habitat for this species to occur. The construction and maintenance of trails and staging areas in the vicinity of these areas has the potential to result in direct impacts on Stephens' kangaroo rat. Potential impacts on Stephens' kangaroo rat resulting from the project would be mitigated to a less-than-significant level through the completion of focused surveys (where necessary) and the presence of a biological monitor during trail/staging area construction to ensure avoidance of potentially occupied or occupied burrows.

Finally, the project could result in impacts on migratory birds or destruction of active migratory bird nests and/or eggs protected under the MBTA. The project may destroy birds or bird nests protected under the MBTA if grading or vegetation clearing is conducted during the breeding season for these taxa (approximately January 15 – September 15). Such impacts would violate the MBTA and would be considered significant. Biological monitoring and avoidance of active nests during the breeding season would reduce this impact to a less-than-significant level.

V. CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

☐ Potentially Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant With Mitigation Incorporated: According to a previous cultural resources inventory conducted for the preserve, a total of 229 cultural resources, including 211 sites and 18 isolated finds, were identified within the Preserve (Case and Carrico 2010). ICF prepared a cultural resources technical report (provided as an attachment to this report), dated November 2011, which evaluated the significance of cultural resources based on the results of an inventory conducted for the entire Preserve (Case and Carrico 2010). The inventory report compiled information from several separate studies, including studies of the NE (Carrico 2003) and SW (Carrico and Cooley 2005) portions undertaken prior to the establishment of the Preserve, as well as original field studies for the NW and SE portions. The report also included the results of a records search that was undertaken for the Preserve and a ¼ mile buffer around the Preserve.

The 211 sites consisted of 171 prehistoric sites, 6 multi-component, 29 historic, and 5 sites of unknown age. The prehistoric resource types on the Preserve include large and small habitation sites, milling stations, quarries, lithic scatters, rock alignments and enclosures, and a complex of sites that represent the prehistoric and ethnographic village of *Pa'mu.* Historic resources include standing structures, roadways, rock features, a mine, a dam, survey monuments, WWII era bombing targets, and trash scatters. Ninety-eight other cultural resources have been previously recorded within a one-quarter mile radius of the Preserve.

Based on the results of the cultural resources report, it has been determined that some of the historic resources are significant pursuant to the State of California Environmental Quality Act (CEQA Guidelines, Section 15064.5). Of the 229 resources that could be impacted by implementation of the RMP and VMP, previous studies have tested and evaluated only 40 of these archaeological sites. Thirteen have been found significant, including 10 that have been found significant under the County of San Diego's RPO. Twenty-seven sites were evaluated as not significant, and the 18 isolates are also not considered significant. However, five of the resources evaluated as not significant would be part of a proposed archaeological district related to the ethnographic village of *Pa'mu*. As such, they would be considered contributing elements to the district, and therefore significant. The remaining

171 cultural resources have not been formally evaluated and are therefore considered potentially significant.

Implementation of RMP and VMP Management Directives

Implementation of the RMP and VMP management directives could result in impacts on cultural resources.

The RMP allows for the development of interpretive and educational materials. To avoid any impacts on cultural resources, these materials would be developed in such a way that information on the location of the resources is not released to the public. For prehistoric and ethnographic resources, interpretive and educational materials would be developed in coordination with Native American representatives to ensure that other sensitive information is not disclosed as well.

As a component of the VMP, fire management activities, particularly those involving vegetation removal, ground disturbing activity, or use of vehicles or heavy equipment, have the potential to impact cultural resources. In order to reduce impacts to a less-than-significant level, prior to any fire management activity, the location of known cultural resources would be reviewed in order to develop a strategy to avoid the resources. Installation of signage, fencing, or gates placed along the trails also would involve ground disturbing activity (i.e., digging of post holes), and would have the potential to impact cultural resources. These impacts would be avoided through location of any trail signage or fencing in areas safely outside the boundaries of known cultural resources. Where there is a potential for resources, an archaeological and Native American monitor (as necessary) would be required to be present during ground disturbance activities.

Many other activities in the RMP and VMP would not impact cultural resources. For example, the VMP indicates that habitat restoration would be passive, and so would not have direct impacts on cultural resources. Furthermore, in the VMP, mechanical vegetation removal that might impact cultural resources is not anticipated.

The proposed mowing of 0.5 acre in the NE portion of the Preserve for the emergency access route will utilize a flail mower that will not result in ground disturbance and therefore would not result in significant impacts on cultural resources as no ground disturbance would occur.

Multi-Use Trail System

Improvements to existing trails would be minimal and limited to future road maintenance—which would confine activities to the existing trails and would not involve ground disturbing activity—and erosion control. Impacts related to continued use of the existing roads/trails would not differ in kind from the

impacts resources along the trails have already experienced. For this reason, it is not anticipated that those resources located in areas of existing trails would suffer direct impacts from trail use or ongoing maintenance.

It is possible, however, that resources in the vicinity of the existing trails might be impacted by visitor-caused damage, such as looting or vandalism. It is important to note that in discussions with Native American representatives, none of the representatives identified this as a particularly pressing concern for the resources in the vicinity of the trails. ~~Instead, more concern was expressed for resources that might have sacred significance. Most of the prehistoric resources in the vicinity of the trails are small milling stations with few associated artifacts. The exception is CA-SDI-19558, a large habitation site. It was identified as a sensitive resource that, because of its inviting geographical location, might draw unwanted visitor attention. Also, any of the resources located along the existing trails may contain artifacts that could be collected by visitors. Appropriately placed fencing and signage would reduce these potential impacts to a less-than-significant level.~~

Unlike existing trail reuse, new trail construction has the potential to directly affect cultural resources along the route of the trail. All new trail segments within the boundaries of the Preserve, including the proposed bridge crossing and temporary construction staging area, as well as the alternative trail segment that would connect to a road and bridge crossing on RMWD property, were designed to be located in areas that would avoid cultural resources to the greatest extent feasible. It is still possible that the final construction siting of the Santa Maria Creek crossing could result in significant impacts on cultural resources located within the proposed bridge construction footprint or in temporary construction staging areas. Another potential impact could occur to a single cultural resource (CA-SDI-10270) located along the route of the proposed trail between the NE portion of the Preserve and Rangeland Road. To mitigate these impacts, final design placement of these improvements would be coordinated with a qualified archaeologist such that sensitive cultural resources are avoided. Since the trail easement associated with CA-SDI-10270 is only 25-feet wide, it may not be possible to entirely avoid this resource. If avoidance is infeasible, a limited program of subsurface archaeological testing would be implemented to evaluate the resource for significance according to CRHR and San Diego RPO criteria. If the resource is found to be significant and cannot be avoided, additional mitigation would need to be developed, which might include data recovery excavation.

In addition, it is possible that ground disturbing activity, even in areas with no known cultural resources, could impact previously unrecorded cultural resources. Monitoring of ground-disturbing activities by a qualified archaeologist and/or Native American representative, along with the

evaluation and treatment of newly discovered cultural resources would reduce this impact to a less-than-significant level.

NE Portion Infrastructure Improvements

Infrastructure improvements, which propose to alter or demolish extant historic-period structures and which will involve ground disturbing activity, such as ~~trenching of an existing water line and~~ grading for parking, also have the potential to damage or destroy cultural resources. Infrastructure improvements would occur primarily in the NE portion of the Preserve. Two cultural resources are located in the area of the proposed staging area: CA-SDI-16579 and P-37-025102. However, according to the 2003 site record, P-37-025102, a historic ranch complex, has been determined ineligible for listing in the CRHR because it lacks distinctive architectural and design characteristics, and is not associated with significant people or events in local, state, or regional history. This evaluation applies to the residence as well as associated structures, including a barn and rodeo corral. CA-SDI-16579, a historic trash scatter, has been recommended as ineligible in this document because of its poor information potential and disturbed context.

A single prehistoric resource, CA-SDI-16628, is located in a nearby area where a pavilion will be constructed as a viewpoint. This resource has not been evaluated and so must be considered significant. Potential impacts on this resource would be avoided through design (i.e., placement of the pavilion outside of the resource).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant With Mitigation Incorporated: Based on the Cultural Resources Phase I Survey and Inventory for the Ramona Grasslands Preserve, discussed in Section V.a. above, it has been determined that the Preserve includes 12 prehistoric resources that are CEQA-significant and 10 are also County RPO significant. The later must always be avoided, whereas CEQA significant resources can be mitigated by a research design and data recovery program to capture the scientific importance of the resource. In addition to significance based on CEQA criteria, prehistoric resources may be deemed as significant cultural properties or places by the Native American community. For resources so classified, DPR would need to have on-going

consultation with the Native American community to clearly delineate the constraints governing those resources.

Unevaluated resources or resources already determined to be significant that are adjacent to the multi-use trail system or designated staging areas should be periodically inspected by qualified personnel to ensure that no degradation has occurred. It is recommended that resources should be inspected every five years. Each inspection should be documented by a report that describes current conditions at the resource with particular emphasis on any adverse changes to site integrity. If degradation is identified the reports should also present possible solutions.

Implementation of RMP and VMP Management Directives

See the discussion in Section V.a. above.

Multi-Use Trail System

See the discussion in Section V.a. above.

NE Portion Infrastructure Improvements

See the discussion in Section V.a. above.

c) Directly or indirectly destroy a unique geologic feature?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The project area may contain a unique geological feature that is listed in the County's Guidelines for Determining Significance for Unique Geologic Resources. The unique geologic feature is Green Valley Tonalite, which is identified in Green Valley, between U.S. 395 and Ramona. Green Valley is located west of the project area, and the Green Valley Tonalite could occur within the projects western boundary. The proposed project would result in impacts on a total of approximately 6.~~6~~ 5 acres, including approximately 5 acres located in the NE portion of the Preserve. Impacts would be related to minor surface disturbance (trails, supporting infrastructure, ~~staffing areas~~ etc.) and; therefore, it is not anticipated that the areas proposed for development would directly or indirectly destroy a unique geologic feature. Project impacts are therefore considered to be less than significant.

d) Directly or indirectly destroy a unique paleontological resource or site?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: A review of the County's Paleontological Resources Maps indicates that the project is located in an area that has low-to-no potential for containing paleontological resources. The project area is located within the Peninsular Ranges Region, which is primarily underlain by plutonic igneous rock. Due to the original igneous nature of the project area's rock strata and the subsequent metamorphism, the likelihood of paleontological remains is rare. Therefore, the project would not directly or indirectly impact any paleontological resources.

e) Disturb any human remains, including those interred outside of formal cemeteries?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: It is possible that ground disturbing activity, even in areas with no known human remains, could impact previously unrecorded human remains. As outlined in CEQA Guidelines Section 15064.5, in the event that human remains are discovered during grading or construction of the project, the County will work with the appropriate Native Americans as identified by the Native American Heritage Commission (NAHC) as provided in Public Resources Code Section 5097.98 to ensure that all human remains will be appropriately treated or disposed of, with appropriate dignity, the human remains and any items associated with native American burials with the appropriate native Americans as identified by the NAHC. Compliance with state and County-mandated procedures would reduce this impact to a less-than-significant level.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☐ Less than Significant Impact
☑ No Impact

Discussion/Explanation:

No Impact: The project area is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. Therefore, there would be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The *Uniform Building Code* (UBC) and the *California Building Code* (CBC) classifies all San Diego County with the highest seismic zone criteria, Zone 4. However, the proposed project is not located within five kilometers of the centerline of a known active-fault zone as defined within the *Uniform Building Code's Maps of Known Active Fault Near-Source Zones in California*. Additionally, to ensure the structural integrity of all buildings and structures, the project will conform to the Seismic Requirements as outlined within the CBC. Therefore, the project would not expose people or structures to potential substantial adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project area, particularly the southern half, includes lands within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Construction of the proposed ranger station and maintenance building would replace existing development, and the proposed viewing pavilion would be located adjacent to another existing residence. The presence of these older existing developments indicates that on-site conditions do not have susceptibility to settlement and liquefaction. In addition, since liquefaction potential at the site is considered low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The northern portion of the project site contains areas identified as "Landslide Susceptibility Areas." Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (County, 2010). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. However, the areas of the project proposed to be developed do not show evidence of either pre-existing or potential conditions that could become unstable and result in landslides. Proposed structures would be constructed on flat, previously disturbed properties and landform modification would be minimal. Therefore, there would be no potentially significant impact from the exposure of people or structures to adverse effects from adverse effects of landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: According to the Soil Survey of San Diego County, the soils on the Preserve are identified as Acid Igneous Rock Land, Bonsall, Bonsall-Fallbrook, Bosanko, Cieneba, Cieneba-Fallbrook, Fallbrook, Las Posas, Placentia, Ramona, Tujunga, Visalia, and Vista soil associations. These soils have erodibility ratings that range from "slight" to "moderate" and "high" as indicated by the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Soil Conservation and Forest Service dated December 1973. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes.

- The project would include Best Management Practices (BMPs) to ensure sediment does not erode from the proposed project site including measures to counter the effects of trail erosion.

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil.

c) Will the project produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project. Additionally, the project will not alter the land in any way as to create unstable conditions as the project does not propose landform alteration. For further information refer to VI. Geology and Soils, Question a., i-iv listed above.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project area includes land with expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). This was confirmed by staff review of the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The soils on-site are Acid Igneous Rock Land, Bonsall, Bonsall-Fallbrook, Bosanko, Cieneba, Cieneba-Fallbrook, Fallbrook, Las Posas, Placentia, Ramona, Tujunga, Visalia, and Vista soil associations. However, the project would not have any significant impacts because the project is required to comply with the improvement requirements identified in the 1997 UBC, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Therefore, these soils would not create substantial risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project involves two septic systems associated with existing houses located in the NE portion of the Preserve. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities.

DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH was unable to test the two existing septic systems because water is not currently available at the houses. The house on the bottom of the hill is on a city water meter and the water pipe is within 10-15 feet of the house. The nearest water source for the house on the hill is a

well at the bottom of the hill about 300 yards to the west. DEH took water samples at this well in February 2011 and the water passed a colilert test and is potable. In order to test the septic system, a new water line (part of the proposed Project) would have to be dug from the well to the house on top of the hill. DEH reported that the septic tank associated with the house at the bottom of the hill is partially filled w/ dirt so it will need to be replaced with a new plastic tank but will use the same footprint. DEH also reported that the septic tank associated with the house on the hill seems functional, but would need to be tested. This septic tank could be replaced with a new plastic tank and would use the same footprint. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.

VII. GREENHOUSE GAS EMISSIONS -- Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

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

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

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe

drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions. According to the San Diego County Greenhouse Gas Inventory (Anders et al. 2008), the region must reduce its GHG emissions by 33 percent from "business-as-usual" emissions to achieve 1990 emissions levels by the year 2020. "Business-as-usual" refers to the 2020 emissions that would have occurred in the absence of the mandated reductions.

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

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

implement mitigation measures to reduce emissions, it is expected that a majority of future development will contribute to emission reduction goals that will assist the region in meeting its GHG reduction targets.

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

The project includes implementation of a multi-use trail system and several small recreational facilities that are expected to generate less than 900 metric tons of GHG emissions based on estimates of GHG emissions for various project types included in the CAPCOA white paper. Emissions from the project would be generated from an anticipated increase in vehicle trips with implementation of new public access and other public amenities proposed by the project. The project's GHG emissions are found to have a less than cumulatively considerable contribution to GHG emissions because the project would generate less than 900 metric tons of GHGs.

Furthermore, projects that generate less than 900 metric tons of GHG would also participate in emission reductions because air emissions including GHGs are under the purview of CARB (or other regulatory agencies) and would be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles would be subject to increased fuel economy standards and emission reductions, large and small appliances would be subject to more strict emissions standards, and energy delivered to consumers would increasingly come from renewable sources. As a result, even the emissions that result from projects that produce less than 900 metric tons of GHG would be subject to emission reductions. Likewise, the project would also participate in the mandated emissions reductions through energy and resource use that is subject to emission reduction mandates beyond "business-as-usual."

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

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

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

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

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego is currently in the process of updating its General Plan and incorporating associated climate change policies. These policies will provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets.

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

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated
☑ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Project implementation would not involve the routine use and storage of hazardous materials; however, construction activities associated with multi-use trail improvements and the proposed facility modifications/improvements at the staging site in the NE portion of the Preserve would involve periodic and routine transport, use, storage, and disposal of minor amounts of chemicals routinely associated with construction, such as vehicle fuels (gasoline and diesel), engine oil, cartridges containing primer for ignition and nitrocellulose propellant for gas production, hydraulic fluid, and transmission fluid. Also, fuel and plant herbicides (glyphosate, imzapyr, tryclopyr) would be transported and used on site during vegetation management (e.g., invasive nonnative plant species controls, habitat restoration). Plant herbicides used in the restoration of sites have very low toxicity ("caution" ratings) and formulations approved for use in aquatic areas would be used. No disposal of materials would occur on the Preserve. In addition, the project site includes two facilities listed on the EPA's Resource Conservation and Recovery Information System (RCRIS) as a Hazardous Materials Handler. These facilities include Cruise Air Aviation and Ramona Aircraft Painting, Inc., both of which are located along Montecito Road within the bounds of the project site. However, the project would not result in a significant hazard to the public or the environment because all storage, handling, transport, emission and disposal of hazardous substances would be in full compliance with local, State, and Federal regulations. California Government Code§ 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

The project also proposes to demolish or renovate two onsite residences that were constructed prior to 1980 that have been determined to contain both lead based paint (LBP) and asbestos containing materials (ACMs). Lead is a highly toxic metal that was used up until 1978 in paint used on walls, woodwork, siding, windows, and doors. Lead containing materials shall be managed by applicable regulations including, at a minimum, the hazardous

waste disposal requirements (Title 22 CCR Division 4.5, the worker health and safety requirements (Title 8 CCR Section 1532.1) and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Asbestos was used extensively from the 1940's until the late 1970's in the construction industry for fireproofing, thermal and acoustic insulation, condensation control, and decoration. The USEPA has determined that there is no "safe" exposure level to asbestos. It is therefore highly regulated by the USEPA, CalEPA, and the CalOSHA. Demolition or renovation operations that involve asbestos-containing materials must conform to San Diego Air Pollution Control District (SDAPCD) Rules 361.140-361.156. In accordance with existing regulations, the project would be required to incorporate asbestos and lead abatement and control measures as part of demolition or renovation activities (County of San Diego 2011).

The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances.

Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, State, and Federal regulation; the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☑ No Impact

Discussion/Explanation:

No Impact: The project is not located within one-quarter mile of an existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Based on a regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. A majority of the SE portion of the project site is located within the Ramona Bombing Target and Emergency Landing Field Formerly Used Defense Site (FUDS). A site inspection report, dated February 2010, prepared by Parsons Infrastructure

and Technology Group, Inc., concluded that no unacceptable risks to human health are expected due to exposure to surface soils and sediments in the FUDS. Therefore, the project would not create a significant hazard to the public or environment.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project is located within an Airport Land Use Compatibility Plan (ALUCP) for the Ramona Airport and falls within the designated Inner Safety Zone, Inner Turning Zone, Outer Safety Zone, Sideline Zone, and Traffic Pattern Zone, which are identified as having high, moderate, low to moderate, low to moderate, and low risk levels, respectively. However, the project intends to implement RMP and VMP management directives and related design improvements to enhance the existing Preserve, including establishment of a multi-use trail system (for hiking, biking, and equestrian use), a new ranger station and maintenance building, staging area, picnic shade structures, a primitive amphitheater, and viewing pavilion/visitor's kiosk. These improvements would not result in hazards to airport safety or surrounding land uses for the following reasons:

- The project would comply with Airport Land Use Compatibility Policies for the Ramona Airport, including: Noise, Safety, Airspace Protection, and Overflight Compatibility Policies.
- The project does not propose any distracting visual hazards including but not limited to distracting lights, glare, sources of smoke or other obstacles or an electronic hazard that would interfere with aircraft instruments or radio communications. Therefore, the project complies with the Federal Aviation Administration Runway Approach Protection Standards (Federal Aviation Regulations, Part 77 – Objects Affecting Navigable Airspace).
- The project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.
- The project does not propose any artificial bird attractor, including but not limited to reservoirs, golf courses with water hazards, large detention and retention basins, wetlands, landscaping with water features, wildlife refuges, or agriculture (especially cereal grains).

Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project would not constitute a safety hazard for people residing or working in the project area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN:

Less than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project is located within and in the vicinity of wildlands to the north, west, and south of the site that have the potential to support wildland fires. However, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project would comply with the regulations relating to emergency access, water supply, and defensible space specified in the

Uniform Fire Code, Article 9 and Appendix II-A, Section 16, as adopted and amended by the local fire protection district. Implementation of these fire safety standards have been incorporated into the RMP and VMP. In accordance with County policy, the Ramona Fire District also would be involved in design review for the project. Therefore, through compliance with the Uniform Fire Code, Article 9 and Appendix II-A, Section 16, it is not anticipated that the project will expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires.

h) Expose people to significant risk of injury or death involving vectors, including mosquitoes, rats or flies?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project does not involve or support uses that allow water to stand for a period of 72 hours (three days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as agricultural operations (e.g., chicken coops, dairies, etc.), solid waste facility, or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes a multi-use trail system, visitor staging area, and recreational facilities/structures that would require site design measures and/or source control BMPs and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable from entering storm water runoff. Additionally, the native vegetation surrounding the trail and staging area would remain undisturbed and would act as a natural biofilter. BMPs would include, but are not limited to, stabilized construction entrance/exit areas, permeable surfaces, and silt fencing. Silt fences and fiber rolls would be specified to minimize surface transport of sediments. These measures would enable the project to meet waste discharge requirements as required by the Land-Use Planning for New

Development and Redevelopment Component of the San Diego Municipal Permit (RWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project lies in the 905.41 Ramona hydrologic subarea within the San Dieguito River hydrologic unit. According to the Clean Water Act Section 303(d) list, July 2003, a portion of this watershed at the Pacific Ocean and San Dieguito River is impaired for coliform bacteria. Constituents of concern in the San Dieguito watershed include coliform bacteria; nutrients, sediment, lowered dissolve oxygen, and trace metals. The project proposes the following activities that are associated with these pollutants: minimal amounts of ground disturbance associated with construction of trails, staging area and small recreational facilities. However, site design measures and/or source control BMPs and/or treatment control BMPs would be employed such that potential pollutants would be reduced in any runoff to the maximum extent practicable so as not to increase the level of these pollutants in receiving waters. Additionally, the native vegetation surrounding the trail and staging area would remain undisturbed and would act as a natural biofilter. BMPs for these features would include, but are not limited to, stabilized construction entrance/exit areas, permeable surfaces (no impervious surfaces proposed), and silt fencing. Silt fences and fiber rolls would be specified to minimize surface transport of sediments.

The proposed BMPs are consistent with the regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result the project would not contribute to a cumulative impact on an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and storm water permitting regulation for County of San Diego, Incorporated Cities of San Diego County, and San Diego Unified Port District includes the following: California Regional Water Quality Control Board (RWQCB), San Diego Region Order No. R9-2007-0001, NPDES No. CAS0108758, issued January 24, 2007; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ordinance No. 9926, revised March 2008); County Storm Water Standards Manual adopted on February

20, 2002, and amended August 5, 2003 (Ordinance No. 9589). The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. Ordinance No. 9926 (WPO) has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Ordinance No. 9589 is Appendix A of Ordinance No. 9926 (WPO) and sets out in more detail, by project category, what dischargers must do to comply with the Ordinance and to receive permits for projects and activities that are subject to the Ordinance. Collectively, these regulations establish standards for projects to follow which intend to improve water quality from headwaters to the deltas of each watershed in the County. Each project subject to WPO is required to propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The Regional Water Quality Control Board has designated water quality objectives for waters of the San Diego Region as outlined in Chapter 3 of the Water Quality Control Plan (Plan). The water quality objectives are necessary to protect the existing and potential beneficial uses of each hydrologic unit as described in Chapter 2 of the Plan.

The project lies in the 905.41 Ramona hydrologic subarea, within the San Dieguito River hydrologic unit that has the following existing and potential beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground water: municipal and domestic supply; agricultural supply; industrial process supply, industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; estuarine habitat; marine habitat; preservation of biological habitats of special significance; migration of aquatic organisms; and, rare, threatened, or endangered species habitat.

The project proposes the construction and maintenance of a multi-use trail, visitor staging area, and several small recreation facilities and structures. In addition, the project would implement invasive nonnative plant species control measures and habitat restoration as necessary. Site design measures and/or source control BMPs and/or treatment control BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the proposed project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Additionally, the native vegetation surrounding the trail and staging area would remain undisturbed and would act as a natural biofilter. BMPs would include, but are not limited to, stabilized construction entrance/exit areas, permeable surfaces (no impervious surfaces proposed), and silt fencing. Silt fences and fiber rolls would be specified to minimize surface transport of sediments.

In addition, the proposed BMPs are consistent with the regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project will not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section IX., Hydrology and Water Quality, Question b, for more information on regional surface water and storm water planning and permitting process.

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project would obtain its water supply from the RMWD that obtains water from surface reservoirs. The project would not use any groundwater for any purpose, including irrigation, domestic, or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., ¼ mile). These activities and operations can

substantially affect rates of groundwater recharge. Therefore, no impact on groundwater resources is anticipated.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes the construction and maintenance of a multi-use trail, visitor staging area, and several small recreation facilities and structures. In addition, the project would implement invasive nonnative plant species control measures and habitat restoration as necessary. The proposed project would implement site design measures, source control, and/or treatment control BMPs to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable. The project design for the trail and staging area provides for minimal grading and would utilize the natural topography to maintain the existing drainage flow on site. Additionally, the native vegetation surrounding the trails and staging area would remain undisturbed and would act as a natural biofilter. BMPs are required during construction activities and would include, but are not limited to, features such as stabilized construction entrance/exit areas, permeable surfaces, and silt fencing. Silt fences and fiber rolls would be specified to minimize surface transport of sediments. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (RWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). Due to these factors, it has been found that the project would not result in significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation would be controlled within the boundaries of the project, the project would not contribute to a cumulatively considerable impact. For further information on soil erosion refer to VI. Geology and Soils, Question b.

f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons:

- The project design for the multi-use trail and staging area utilizes the natural topography and would maintain the existing drainage flow on site.
- Native vegetation surrounding the multi-use trail and staging area would remain undisturbed and would act as a natural biofilter.
- The project would not increase water surface elevation in the Santa Maria Creek or its tributaries.
- The project would not increase surface runoff exiting the project site equal to or greater than one cubic foot/second.

Therefore, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Moreover, the project would not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project would substantially increase water surface elevation or runoff exiting the site, as detailed above.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would result in the conversion of less than 1 percent of the total project site area (3,490 acres) of previously pervious land to impervious surfaces. Additionally, the proposed ranger station and maintenance building would be built on existing or replaced

impervious surfaces. This amount of conversion to impervious surfaces would not contribute runoff water that would exceed the capacity of existing storm water drainage systems. Therefore, the project would not create or contribute significant runoff water which would exceed the capacity of the existing storm water drainage system.

h) Provide substantial additional sources of polluted runoff?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes minimal grading and construction that has the potential to result in pollution and sedimentation of surface water runoff. The grading plan would include design measures that address storm water protection and erosion control, and a SWPPP would be prepared for the project that outlines specific design measures and BMPs to be employed to reduce potential pollutants to the maximum extent practicable. Refer to VIII. Hydrology and Water Quality Questions a, b, c, for further information.

i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☑ No Impact

Discussion/Explanation:

No Impact: The project does not involve the placement of housing.

j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project site includes a portion of Santa Maria Creek in the southwest portion of the Preserve which is considered by

the Federal Emergency Management Agency (FEMA) a 100-year flood hazard area. This portion of the Preserve is a dedicated flood easement and is part of the Flood Protection Corridor Program and is subject to the terms of the "Reservation of Conservation and Flood Easement" agreement (DPR 2004). However, the project is not proposing to place structures, access roads, or other improvements which would impede or redirect flood flows in this area.

k) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The project site includes a portion of Santa Maria Creek in the southwest portion of the Preserve which is considered by the Federal Emergency Management Agency (FEMA) a 100-year flood hazard area. This portion of the Preserve is a dedicated flood easement and is part of the Flood Protection Corridor Program and is subject to the terms of the "Reservation of Conservation and Flood Easement" agreement (DPR 2004). However, the project is not proposing to place structures, access roads, or other improvements which would expose people to a significant risk of loss, injury or death involving flooding. Additionally, the project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County, and is not located immediately downstream of a minor dam that could potentially flood the property.

l) Inundation by seiche, tsunami, or mudflow?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

i. SEICHE

No Impact: The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

ii. TSUNAMI

No Impact: The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

No Impact: Mudflow is a type of landslide. The project site contains small, dispersed areas identified as "Landslide Susceptibility Areas". However, the project proposes minimal land disturbance that would expose a small amount of unprotected soils and it is not anticipated that the project would expose people or property to inundation due to a mudflow.

X. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The project does not propose the introduction of new infrastructure such major roadways or water supply systems, or utilities to the area; therefore, the proposed project will not significantly disrupt or divide the established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The proposed project is subject to the General Plan's Regional Land Use Element (RLUE) Policy 2.4 Non-Urban Residential Designations (Multiple Rural Use (18)); Policy 2.5 Agricultural Designations (Intensive Agriculture (19) and General Agriculture (20)); and Policy 2.6 Special Purpose Designations (Specific Plan Area (21) and Public/Semi-Public (22)). The project is consistent with the General Plan because the recreational uses proposed to enhance the existing open space preserve would not conflict with the above listed Land Use Designations that

strive to retain rural character of non-urban lands (Goal 2.3); and ensure preservation of contiguous regionally significant open space corridors (Goal 2.6). In addition, the General Plan commits to continue to provide and expand the variety of trail experiences, including staging areas, and provide connections to other public trail systems pursuant to Countywide Trail Policies 1.1 and 1.3.

The property is zoned S88 Specific Plan which is intended to accommodate Specific Plan areas shown on the San Diego County Plan (refer to above paragraph), and A70 Limited Agriculture which is typically applied to areas throughout the County to protect moderate to high quality agricultural land pursuant to the Zoning Ordinance Section 2700. As previously indicated in Section II. Agricultural Resources, the project would not displace existing nor preclude future agricultural uses and construction and use of the trails and project facilities would not adversely affect existing or future agricultural uses; therefore, the proposed project is consistent with plan and zoning. Additionally, the project adheres to the Ramona Trails and Pathway Plan and community-specific trail design guidelines contained within the County Community Trails Master Plan (CTMP).

The project falls within the Ramona Airport Influence Area and thus is subject to the Ramona Airport Land Use Compatibility Plan (ALUCP) (adopted 2006). The proposed project is consistent with the Ramona ALUCP Compatibility Policies pertaining to (1) noise, (2) safety, (3) airspace protection, and (4) overflight compatibility because:

1. Portions of the project area are located inside the CNEL 55 dB(A) contour for the airport and thus are within the noise impact area. However, development of the proposed staging area and recreational facilities would be located outside this noise contour and would be consistent with the noise compatibility policies. A small portion of the proposed multi-use trail would be implemented within the CNEL 65 dB(A) contour. While noise compatibility criteria do not specifically consider a multi-use trail, other similar outdoor recreational uses including regional parks, athletic fields, and golf courses are compatible uses within this contour. For additional information, please refer to section XII.e Noise.

2. Portions of the project area are located within Safety Zones 2 through 6, with a majority within Zone 6 of the Ramona Airport. No development is proposed within Zones 2 though 5 and only the multi-use trail and staging area are proposed within Zone 6. While the safety compatibility criteria do not specifically consider a multi-use trail and staging area, the project may be evaluated with respect to the similar Non-Group Recreation use, which is considered a compatible use within Zone 6. For additional information, please refer to section VIII.d Hazards and Hazardous Materials.

3. The project does not propose structures equal to or greater than 150 feet in height, constituting an airspace obstruction. It also does not propose any use that will cause visual, electronic, or wildlife hazards to aircraft in flight or taking off or landing at the airport. For additional information, please refer to section XVII.c Transportation/Traffic.

4. The project is located within an overflight easement dedication zone; however, overflight easements are not required for nonresidential development projects. Components of the project include a multi-use trail, staging area, and small recreational facilities/structures; therefore, this policy does not apply to the proposed project.

XI. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project site has been classified by the California Department of Conservation - Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of "Potential Mineral Resource Significance (MRZ-3). However, the project site is surrounded on all sides by developed land uses including residential developments which are incompatible to future extraction of mineral resources within the project site. A future mining operation at the project site would likely create a significant impact on neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to surrounding incompatible land uses.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project site is zoned Specific Planning Area (S88) and Limited Agricultural Use (A70), which is not considered to be an Extractive Use Zone (S82) nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25) (County Land Use Element, 2000).

XII. NOISE -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes a multi-use trail, staging area, and several small recreational facilities and structures. The project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Policy 4b addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). If the project noise exceeds CNEL 60 dBA, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries, or similar facilities where quiet is an important attribute. Project implementation is not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial, or other noise in excess of the CNEL 60 dBA. The project is located adjacent to the Ramona Airport which includes noise impact areas of CNEL 60 and 65 dBA that occur within adjacent project boundaries. However, the only project feature that would be implemented within these noise contours would be a small extension of the multi-use trail, which is not identified by the San Diego County General Plan, Noise Element as a noise sensitive land use. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Ramona Community Plan and Ramona ALUCP

The County of San Diego General Plan, Ramona Community Plan, has a standard of CNEL 55 dB(A) for all projected noise contours near main circulation roadways, airports and other noise sources and requires mitigation if this level is exceeded. Project implementation is not expected to expose existing or planned noise sensitive areas to road airport, heliport, railroad, industrial or other noise in excess of the CNEL 55 dB(A). The project is located adjacent to the Ramona Airport which includes noise impact areas identified by the Ramona ALUCP of CNEL 55, 60, and 65 dBA that occur within adjacent project boundaries. However, the only project feature proposed to be implemented within these noise contours would be a small extension of the multi-use trail, which is not identified as a noise sensitive land use (The Ramona Community Plan refers to the San Diego County General Plan, Noise Element for noise standards). Furthermore, the project would also be consistent with the noise compatibility policies of the Ramona ALUCP. While noise compatibility criteria do not specifically consider a multi-use trail, other similar outdoor recreational uses including regional parks, athletic fields, and golf courses are compatible uses within the CNEL 55, 60, and 65 dBA contours. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Ramona Community Plan and Ramona ALUCP.

Noise Ordinance – Section 36-404

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36-404) at or beyond the project's property line. The site is zoned S88 and A70 which have a one-hour average sound limit of 50 dBA between the hours of 7 a.m. and 10 p.m., and 45 dBA between the hours of 10 p.m. and 7 a.m. The adjacent properties are similarly zoned including some residential development, which all have similar one-hour average sound limits. The project does not involve any permanent noise-generating equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410

The project entails grading and construction, which would produce noise on a temporary basis. The project would not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36-410). Construction operations would occur only during permitted hours of operation pursuant to Section 36-410. The project would not operate construction equipment in proximity of the Preserve's property boundary that would be in excess of 75 dB averaged over an 8-hour period.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less than Significant Impact with Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project involves the following permanent noise sources that may increase the noise ambient level: ranger station, staging area, maintenance building, three recreational structures with picnic areas, public viewing pavilion, and a primitive amphitheater. While the project may result in a permanent increase in ambient noise levels above existing levels, the increase would not be substantial due to the limited size of the impact area (less than 1 percent of the 3,490-acre project area). As indicated in the response to XII. Noise, Question a., the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of the

County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels, based on review of the project by County staff. Studies completed by the Organization of Industry Standards (ISO 362; ISO 1996 1-3; ISO 3095; and ISO 3740-3747) state an increase of 10 dB is perceived as twice as loud and is perceived as a significant increase in the ambient noise level.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial, or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor sound systems.

Project construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36-410), which are derived from State regulations to address human health and quality of life concerns. Construction operations would occur only during permitted hours of operation (7 a.m. to 7 p.m., Monday thru Saturday) pursuant to Section 36-410. Also, it is not anticipated that the project would operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Portions of the proposed project area are located within the Airport Land Use Compatibility Plan (ALUCP) planning area for the Ramona Airport. However, project implementation is not expected to expose people residing or working in the project area to excessive noise levels in excess of the CNEL 60 dB(A). Portions of the project area are located within noise impact areas identified by the Ramona ALUCP of CNEL 55, 60, and 65 dBA; however, the only proposed project feature that would be implemented within these noise contours would be a small extension of the multi-use trail. While noise compatibility criteria of the Ramona ALUCP do not specifically consider a multi-use trail, other similar outdoor recreational uses including regional parks, athletic fields, and golf courses are compatible uses within the CNEL 55, 60, and 65 dBA contours.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

XIII. POPULATION AND HOUSING -- Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes construction of a staging area and recreational facilities which would necessitate the extension of infrastructure and public facilities such as water, electricity, or sewer. However, this physical change would not induce substantial population growth in the area, because the extension of infrastructure such as water, electricity, or sewer into previously unserved areas is consistent with the

County General Plan and the project would be consistent with County planning goals.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The proposed project will not displace any existing housing since the site is currently vacant.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The proposed project will not displace a substantial number of people since the site is currently vacant.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?
ii. Police protection?
iii. Schools?
iv. Parks?
v. Other public facilities?

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☑	No Impact

Discussion/Explanation:

No Impact: The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☑ No Impact

Discussion/Explanation:

No Impact: The project does not propose any residential use, including but not limited to a residential subdivision, mobile home park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project involves new recreational facilities including a new ranger station, horse riding arena, staging area parking, maintenance building, primitive amphitheater, multi-use trail system, viewing pavilion, and several picnic areas with shade structures. However, as outlined in this Environmental Analysis Form, these new facilities would not result in adverse physical effects on the environment. Specifically, refer to sections I. Aesthetics, IV. Biological Resources, V. Cultural Resources, VI. Geology and Soils, and VIII. Hydrology and Water Quality for more information.

XVI. TRANSPORTATION/TRAFFIC -- Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Public Facilities Element (PFE), the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less than Significant: The proposed project would accommodate parking for ~~2 employees,~~ ~~30~~ 20 visitor vehicles, and ~~18~~ 10 horse trailers with additional overflow car parking available if needed.

While San Diego Association of Governments (SANDAG) trip generation tables are typically used to estimate trip generation for land development projects, the SANDAG "Brief Guide for Vehicular Generation Rates" does not include a rate/category that would apply to the proposed staging area and multi-use trail. Therefore, it was assumed that day users of the staging area for hiker, bikers, and equestrians would stay for at least two to four hours to utilize the proposed trail. Conservatively assuming the staging area would, on average, fill to capacity twice daily with cars and once daily for horse trailers, ~~18~~ 10 trailers and ~~60~~ 40 cars would be serviced daily. Assuming two trips per vehicle (one inbound trip and one outbound trip); the staging area would generate ~~156~~ 100 vehicular trips. Recreational trips could peak at this level during weekends and holidays and reduced usage would occur on the typical weekday. Very few trips would occur during the weekday peak periods.

Access to the Preserve is provided by several gates along or near Rangeland, Montecito, and Highland Valley Roads. Currently, the Preserve is not open to the public; however, there are existing undesignated trails onsite and public access is proposed by the project. A Traffic Impact Analysis, dated December 16, 2004, prepared by Linscott, Law & Greenspan, Engineers was completed for the residential Oak Country Estates project previously proposed for the project site and was included in the Final Oak Country Estates Environmental Impact Report (Certified May 2006). Estimating the previous Oak Country Estates project proposed to be built in the southwestern portion would generate 684 ADT, the Traffic Impact Analysis concluded that the addition of project traffic would not substantially increase traffic in the area and that street system operations would remain unchanged and continue to operate at existing levels of service. No significant project impacts were calculated at signalized or unsignalized intersections or street segments based on County criteria.

Given the previous determination that there would be no project-level traffic impacts for an increase in 684 ADT, it can be reasonably assumed that the current proposed project, which will generate substantially less traffic (~~156~~ 100 ADT) outside of peak hours, will also not result in significant traffic impacts. Furthermore, the small number of additional trips does not surpass County traffic impact thresholds and does not require mitigation. Therefore, the project will not have a significant direct project impact on traffic volume, which is considered substantial in relation to existing traffic load and capacity of the street system.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant: A Traffic Impact Analysis, dated December 16, 2004, prepared by Linscott, Law & Greenspan, Engineers was completed for the residential Oak Country Estates project previously proposed for the southwestern portion of the project site and was included in the Final Oak Country Estates Environmental Impact Report (Certified May 2006). The Traffic Impact Analysis concluded that all roads in the vicinity of the project site, except for SR 67, are projected to operate at LOS D or better in the future. SR 67 will continue to operate at LOS F between Poway Road and Ramona Street, while the segment between Ramona Street to SR 78 will change from LOS D to LOS F.

As indicated above, it is conservatively assumed that the proposed project will generate ~~156~~ 100 ADT. The proposed project is expected to add less than 100 trips to Circulation Element roads projected to operate at LOS F and less than 200 trips to Circulation Element Roads projected to operate at LOS E. Therefore, the proposed project will not cause the traffic impact threshold guidelines established by the County of San Diego to be exceeded. The proposed project will not prevent the planned Circulation Element road system from operating at its planned level of service at buildout. Implementation of the proposed project will not result in a significant traffic impact on the planned road network.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (e.g., building height, antennas, etc.) and hazards to flight (e.g., wildlife attractants, distracting lighting or glare, etc.). The proposed project is located within the Ramona Airport Influence Area. The project includes would develop a multi-use trail (for hiking, biking, and equestrian use), staging area, and several small recreational facilities and structures. Portions of the project area are located within Safety Zones 2 through 6, with a majority within Zone 6 (includes lowest level of risk) of the Ramona Airport. No development is proposed within Zones 2 though 5 and only the multi-use trail and staging area are proposed within Zone 6. While the safety compatibility criteria do not specifically consider a multi-use trail or staging area, the project may be evaluated with respect to the similar Non-Group Recreation use, which is considered a compatible use within Zone 6. Because the proposed land uses are consistent with the allowable land uses identified for the Traffic Pattern Zone within the ALUCP for Ramona airport, the project would not result in a change in air traffic patterns because the allowable land uses within airport safety zones are created for the purpose of ensuring ongoing airport safety, including maintenance of air traffic patterns. Furthermore, the project would not exceed the FAA Part 77 criteria related to airspace obstructions. Refer also to section VIII.e Hazards and Hazardous Materials. Therefore, the proposed project would not have a significant impact on air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or

dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☑ No Impact

Discussion/Explanation:

No Impact: The proposed project would not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate sight distance on a road.

e) Result in inadequate emergency access?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☑ No Impact

Discussion/Explanation:

No Impact: The proposed project would not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Furthermore, the RMP management directives include implementation measures focused on providing and improving emergency vehicle access within the Preserve. Additionally, roads used to access the proposed project site have been reviewed by CalFire and were deemed adequate for emergency access.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☑ No Impact

Discussion/Explanation:

No Impact: The proposed project includes the development of a multi-use trail, visitor staging area, and several small recreation facilities and structures. Project implementation would not result in any construction or new road design features; therefore, would not conflict with policies regarding alternative transportation.

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. The project involves two septic systems associated with existing houses located in the NE portion of the Preserve. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities.

DEH has reviewed the OSWS lay-out for the project pursuant to DEH, Land and Water Quality Division's, "On-site Wastewater Systems: Permitting Process and Design Criteria." DEH was unable to test the two existing septic systems because water is not currently available at the houses. The house on the bottom of the hill is on a city water meter and the water pipe is within 10-15 feet of the house. The nearest water source for the house on the hill is a well at the bottom of the hill about 300 yards to the west. DEH took water samples at this well in February 2011 and the water passed a colilert test and is potable. In order to test the septic system, a new water line (part of the proposed Project) would have to be dug from the well to the house on top of the hill. DEH reported that the septic tank associated with the house at the bottom of the hill is partially filled w/ dirt so it will need to be replaced with a new plastic tank but will use the same footprint. DEH also reported that the septic tank associated with the house on the hill seems functional, but would need to be tested. This septic tank could be replaced with a new plastic tank and would use the same footprint. Therefore, the project is consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would be served by the Ramona Municipal Water District (water). Existing water pipelines are associated with the infrastructure found on-site. Therefore, the project would not require any construction of new or expanded facilities that would cause significant environmental effects.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- ☐ Potentially Significant Impact
- ☑ Potentially Significant Unless Mitigation Incorporated
- ☐ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project involves new and/or expanded storm water drainage facilities. The new and/or expanded facilities include ingress road improvements, and parking for the ranger station and visitor staging. However, as outlined in this IS/MND, the new and/or expanded facilities will not result in adverse physical effect on the environment, because all related impacts from the proposed storm water facilities have been mitigated to a level below significance.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

- ☐ Potentially Significant Impact
- ☐ Potentially Significant Unless Mitigation Incorporated
- ☑ Less than Significant Impact
- ☐ No Impact

Discussion/Explanation:

Less than Significant Impact: The project would be served by the Ramona Municipal Water District (RMWD). Existing water pipelines are associated

with the infrastructure found on-site. Therefore, the project would have sufficient water supplies available to serve the project.

e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☑ No Impact

Discussion/Explanation:

No Impact: The proposed project will rely completely on an onsite wastewater system (septic system); therefore, the project will not interfere with any wastewater treatment provider's service capacity.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

☐ Potentially Significant Impact	☑ Less than Significant Impact
☐ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant Impact: Implementation of the project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project would deposit all solid waste at a permitted solid waste facility and therefore, would comply with Federal, State, and local statutes and regulations related to solid waste.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☑ Potentially Significant Unless Mitigation Incorporated	☐ No Impact

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project specific impacts, the evaluation of the projects potential for significant cumulative effects is considered below in XVIII.b. The project would affect resources considered sensitive by federal, state, or local government. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biological and cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes avoidance of the special-status species breeding seasons and active nests or burrows, biological monitoring, off-site preservation of habitat or acquisition of mitigation credits, presence of an archaeological monitor during land disturbance activities near cultural sites, and avoidance of cultural resources

during final siting of trails and infrastructure. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. No other impacts related to this question are anticipated with implementation of the project. Therefore, this impact is less than significant with mitigation incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

The project site is located adjacent to and west of the Montecito Ranch Specific Planning Area within the Ramona Community Plan boundary. The Environmental Impact Report for the Montecito Ranch Specific Plan (Montecito Ranch EIR), certified on August 4th, 2010, includes a list of over 100 past, present, and future projects that were evaluated as part of the EIR. Consistent with Section 15150 of the CEQA Guidelines, the Montecito Ranch EIR was used in the preparation of this cumulative analysis and is incorporated herein by reference. Please take note; due to the high number of projects included in the Montecito Ranch EIR cumulative list, a project list table is not provided in this Initial Study. Please refer to the Montecito Ranch EIR, starting on page 1-56 for the complete cumulative list of projects. The Montecito Ranch EIR is available for viewing at the County of San Diego Department of Planning and Land Use located at 5201 Ruffin Road, Suite B in San Diego, California.

Less than Significant Impact:

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are significant cumulative effects associated with this project. A cumulative analysis summary for each environmental resource section is provided below.

Aesthetics

The project would not result in cumulative impacts on a scenic vista or visual character because the proposed project viewshed and past, present and future projects within that viewshed have been evaluated and determined to not considerably contribute to a significant cumulative impact. Those projects evaluated in the Montecito Ranch EIR are located within a scenic vista's viewshed, but would not contribute to a cumulative impact because the cumulatively related projects do not involve substantial modification of the existing landforms or the blockage of existing views. In addition, the Montecito Ranch project itself incorporates several mitigation measures to reduce any impacts on aesthetic resources to less than significant. The project-related effects on a scenic vista or visual character were determined to be less than significant. The project would not alter the landscape in such a way as to result in a substantial adverse effect on a scenic vista as native vegetation would remain or be replaced, and no blockages of views would result. Therefore, the project's incremental contribution to cumulative impacts on a scenic vista or visual character would be less than significant.

The project would not result in cumulative impacts on scenic resources within a State scenic highway because the project and all cumulative projects are not located in the vicinity of a designated state scenic highway. Therefore, significant cumulative impacts on a scenic resource within a State scenic highway would not occur.

The project would not result in cumulative impacts related to substantial light or glare that would adversely affect day or nighttime views because the project and all cumulative projects would conform to the County's Light Pollution Code. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, the project would not contribute to a significant cumulative impact on day or nighttime views.

Agriculture and Forestry Resources

Implementation of the proposed project would not contribute to the loss of agriculture or forestry resources. The project would not have a cumulative level impact related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use because none of the existing agricultural uses in the vicinity of the project would be displaced nor would future agricultural uses be precluded as a result of construction of the cumulative projects. Similarly, the proposed project would not result in a cumulative impact related to conflicts with agricultural zoning use because none of the existing agricultural uses in the project vicinity would be displaced nor would future agricultural uses be

precluded as a result of the cumulative projects. Additionally, the area does not consist of land under a Williamson Act contract and does not have any existing Timberland Production Zones. Therefore, significant cumulative impacts on agriculture or forestry resources would not occur.

Air Quality

See discussion under III. c. Air Quality above. The proposed project as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria established by the LUEG guidelines for determining significance, therefore, the construction and operational emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM10, or any O_3 precursors.

Biological Resources

Special Status Species

Current, future, or reasonably foreseeable projects in the cumulative assessment area that were reviewed in association with the cumulative analysis include: the Ramona Airport Improvement Project, Cumming Ranch, Montecito Ranch, and the Ramona Air Center. Together these projects would result in potential impacts on arroyo toad, burrowing owl, Stephens' kangaroo rat, and nesting birds. While the project's impacts associated with the proposed trail network and associated facilities/improvements would contribute to cumulative impacts on these special-status species, the overall project (which includes preservation and long-term maintenance and management of the approximately 3,490-acre Preserve for the benefit of special-status species) and associated impacts would not be cumulatively considerable.

Riparian Habitat or Sensitive Natural Community

Current, future, or reasonably foreseeable projects in the cumulative assessment area that were reviewed in association with the cumulative analysis include: the Ramona Airport Improvement Project, Cumming Ranch, Montecito Ranch, and the Ramona Air Center. Together these projects would result in impacts on southern mixed chaparral, grasslands, wetland/riparian vegetation, and oak woodlands. While the project's impacts associated with the proposed trail network and associated facilities/improvements would contribute to cumulative impacts on these riparian habitats and sensitive natural communities, the overall project (which includes preservation and long-term maintenance and management of the approximately 3,490-acre Preserve) and associated impacts would not be cumulatively considerable

Jurisdictional Wetlands and Waterways

Implementation of the proposed project and recent and foreseeable projects in the vicinity would not result in significant cumulative impacts on jurisdictional wetlands and waters. Federal, state, and county policies require that projects have no net loss of jurisdictional wetlands and waters. Jurisdictional impacts would be reduced to a less-than-significant level through (1) acquisition of permits from the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Game (CDFG), (2) the preservation of the remaining portions of Santa Maria Creek located within the Preserve, and (3) off-site restoration and/or enhancement; the details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB. A creation component is not proposed due to the negligible impact acreage. Other development projects in the vicinity would be required to comply with these policies for wetland mitigation; therefore, the project's incremental contribution to significant cumulative impacts related to jurisdictional wetlands and waterways would be less than significant.

Wildlife Movement and Nursery Sites

As discussed in Section IV.d. above, the proposed project is not expected to impact wildlife dispersal corridors or wildlife movement; thus, there would be no cumulative contributions to wildlife dispersal within the region.

Local Policies, Ordinances, and Adopted Plans

The project would not contribute to potentially cumulatively significant conflicts with local policies or ordinances protecting biological resources.

Cultural Resources

The project would not contribute to a significant cumulative cultural resources impact because project-related effects would be mitigated to a less-than-significant level through monitoring and resource avoidance.

Geology and Soils

The project would not contribute to a significant cumulative impact related to the exposure of people or structures to geologic hazards. The project vicinity is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. The vicinity of the project is also not located within or near other geological formations, such as lateral subsidence

or spreading, that are unstable or would potentially become unstable as a result of cumulative projects. Additionally, to ensure the structural integrity of all buildings and structures, all cumulative projects must conform to the Seismic Requirements as outlined within the California Building Code. Similarly, the potential for cumulative liquefaction and landslide impacts would be less than significant because all cumulative projects would undergo project-specific design review to ensure that people or structures would not be exposed to adverse effects from landslides. Therefore, the project's incremental contribution to significant cumulative impacts related to geologic hazards would be less than significant.

Concerning erosion or the loss of topsoil, the project would not contribute to a cumulatively considerable impact because all the of past, present and future projects that involve grading or land disturbance are required to follow the requirements of: the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); California Regional Water Quality Control Board (RWQCB), San Diego Region Order No. R9-2007-0001, NPDES No. CAS0108758, issued January 24, 2007; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9926 revised March 2008); and County Storm Water Standards Manual adopted on February 20, 2002, and amended August 5, 2003 (Ordinance No. 9589). All cumulative projects are also required to comply with the improvement requirements identified in the 1997 UBC, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Lastly, all cumulative projects would be required to complete project-specific analysis to ensure that soils underlying the site would be capable of supporting the use of septic tanks, or a service availability letter from the RMWD would be obtained that assures adequate capacity for the cumulative projects' wastewater disposal needs. Therefore, the project's incremental contribution to cumulative impacts related to soils that could create substantial risks to life or property would not be significant.

Greenhouse Gas Emissions

See discussion under VII. Greenhouse Gas Emissions above. The project's incremental contribution to cumulatively considerable impacts associated with GHG emissions would be less than significant.

Hazards and Hazardous Materials

The project would not contribute to cumulatively considerable hazards or hazardous materials impacts because the project would adhere to the requirements that regulate hazardous substances and initial planning,

ongoing monitoring, and inspections would occur in compliance with local, State, and Federal regulation. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances. Due to the strict requirements that regulate hazardous substances and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, State, and Federal regulation; the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or related to the accidental explosion or release of hazardous substances. Additionally, all past, present, and reasonably foreseeable projects would also be required to comply with these applicable regulations along with CEQA review related to hazardous materials and waste. Therefore, the project's incremental contribution to cumulative impacts related to the routine use and storage of hazardous materials would not be significant.

The project also proposes to demolish or renovate onsite structures that were constructed prior to 1980 that have been determined to contain both lead and asbestos. In accordance with existing California Occupational Safety and Health Administration (CAL/OSHA) regulations, the project would be required to incorporate asbestos and lead abatement and control measures as part of demolition or renovation activities (County of San Diego 2011). All past, present, and reasonably foreseeable projects would also be required to comply with applicable federal, state, and local policies and regulations along with CEQA review related to hazardous materials and waste. Therefore, the project's incremental contribution to cumulative impacts would be less than significant.

Hydrology and Water Quality

The project would not contribute to cumulatively considerable hydrology and water quality impacts because the project would conform to the waste discharge requirements listed under IX. Hydrology and Water Quality above. These requirements ensure the project would not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project would conform to Countywide watershed standards in the JURMP and SUSMP, derived from State regulation to address human health and water quality concerns. Therefore, the project would not contribute to a cumulatively considerable impact on water quality from waste discharges. Furthermore, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any hydrology and water quality impacts are identified and mitigated. In addition, all cumulative projects would be required to comply with applicable Federal, State, and local policies and regulations related to

hydrology and water quality. Therefore, the project's incremental contribution to cumulative impacts related to hydrology and water quality would be less than significant.

Concerning cumulative groundwater impacts, the project would not contribute to a cumulatively considerable impact because the proposed BMPs the project would implement to protect groundwater resources are consistent with the regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Furthermore, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any impacts on groundwater are identified and mitigated. Therefore, the project would not contribute to a significant cumulative impact related to groundwater.

Land Use and Planning

The project would not contribute to cumulatively considerable land use and planning impacts because the project would have no features that would physically divide an established community and is consistent with the County of San Diego General Plan, Ramona Community Plan, and the Ramona Airport Land Use Compatibility Plan (ALUCP). Additionally, the project adheres to the Ramona Trails and Pathway Plan and community-specific trail design guidelines contained within the County Community Trails Master Plan (CTMP). Furthermore, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any land use and planning impacts are identified and mitigated. In addition, all cumulative projects would be reviewed to ensure they comply with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance). Therefore, the project's incremental contribution to cumulative land use and planning impacts would not be significant.

Mineral Resources

The project would not contribute to a significant cumulative impact related to the loss of availability of a known mineral resource that would be of value because the project site is surrounded on all sides by developed land uses which are incompatible to future extraction of mineral resources within the project site. Additionally, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any mineral resources impacts are identified and mitigated. Therefore,

the project would not contribute to a significant cumulative impact related to mineral resources.

Noise

The project would not contribute to cumulatively considerable noise impacts because the project would not exceed the allowable limits of the County of San Diego General Plan, Noise Element, allowable limits of the County of San Diego General Plan, Ramona Community Plan and Ramona ALUCP, applicable noise levels at the adjoining property line, or standards of the County of San Diego Noise Ordinance (Section 36-410). The project's conformance to these policies and ordinances ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Additionally, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any noise impacts are identified and mitigated along with additional review to ensure they comply with applicable local policies, regulations, and ordinances related to noise. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

Population and Housing

The project would not contribute to cumulatively considerable population and housing impacts because the project does not propose housing or any other features that would affect population or housing. In addition, all past, present and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any population and housing impacts are identified and mitigated. Therefore, the project would not contribute to cumulative impacts related to population and housing.

Public Services

The project would not contribute to cumulatively considerable public services impacts because the level of demand for these services to serve the project would not significantly increase. In addition, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any public services impacts are identified and mitigated. Applicants of all the cumulative projects would pay all required development impact fees to offset the costs of increased demands on public services in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore,

the project would not contribute to a cumulative considerable public services impact.

Recreation

The project would not result in any significant impacts on recreation that could contribute to cumulative impacts. The project does not propose any residential use and the proposed facilities would not result in adverse physical effects on the environment. Moreover, beneficial effects would result with implementation of the proposed Project because it would provide resource management and recreational use improvements to enhance the existing 3,490-acre Ramona Grasslands Preserve. Therefore, the project's contribution to recreational cumulative impacts would be positive.

Transportation

Cumulative impacts related to conflicts with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system would not be significant. The addition of project traffic would not substantially increase traffic in the area and the street system operations would remain unchanged and continue to operate at existing levels of service. Additionally, no significant project impacts were calculated at signalized or unsignalized intersections or street segments based on County criteria. Therefore, the project's incremental contribution to cumulative traffic impacts would be less than significant.

Additionally, significant cumulative impacts related to conflicts with an applicable congestion management program would not occur. The project would not exceed the traffic impact threshold guidelines established by the County of San Diego. Additionally, the proposed project would not prevent the planned Circulation Element road system from operating at its planned level of service at buildout. Therefore, implementation of the proposed project would not contribute to a significant cumulative traffic impact on the planned road network.

The project would also not result in significant cumulative impacts related to change in air traffic patterns, because although the proposed project is located within the Ramona Airport Influence Area, the proposed land uses are consistent with the allowable land uses identified for the Traffic Pattern Zone within the ALUCP for Ramona airport.

Lastly, impacts related to the increase of hazards due to a design feature or inadequate emergency access would not occur. Therefore, the project would not contribute to a cumulatively considerable impact.

Utilities and Service Systems

The project would not contribute to cumulatively considerable utilities and service systems impacts because existing utility and energy systems are adequately sized and have available capacity to meet the needs of the proposed Project. Moreover, all past, present, and reasonably foreseeable projects would be required to undergo project-specific CEQA analysis to ensure any utilities and service systems impacts are identified and mitigated. In addition, all cumulative projects would be required to comply with applicable federal, state, and local policies and regulations related to utilities and service systems. Therefore, the project's incremental contribution to cumulative impacts from present and reasonably foreseeable future projects on utilities and service systems would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

☐	Potentially Significant Impact	☑	Less than Significant Impact
☐	Potentially Significant Unless Mitigation Incorporated	☐	No Impact

Discussion/Explanation:

Less than Significant Impact: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts on human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality X. Noise, XIII. Population and Housing, and XVII. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XIV. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulations refer to http://www4.law.cornell.edu/uscode/. For State regulations refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997.

Anders, S., D. De Haan, N. Silva-Send, S. Tanaka, and L. Tyner. 2008. San Diego County Greenhouse Gas Inventory: An Inventory of Regional Emissions and Strategies to Achieve AB32 Targets. September 2008. Available: <http://www.sandiego.edu/epic/ghginventory>.

Archaeological, Paleontological, and Historic Sites, (PRC §5097-5097.6), California Public Resources Code.

California Code of Regulations (CCR), Title 14. Natural Resources Division, CIWMB and Title 27, Environmental Protection Division 2, Solid Waste.

California Department of Conservation Division of Mines and Geology, Fault-Rupture Hazard Zones in California, Special Publication 42, revised 1997.

California Department of Conservation Division of Mines and Geology, Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production Consumption Region, 1996.

California Department of Conservation Division of Mines and Geology, Abandoned Mined Lands Unit, GIS Data.

California Department of Conservation, Farmland Mapping and Monitoring Program, "A Guide to the Farmland Mapping and Monitoring Program," November 1994.

California Department of Fish and Game (CDFG). 2009. California Natural Diversity Data Base (CNDDB) RareFind 3 Report.

California Emergency Services Act Government Code, Title 2, Division 1, Chapter 7 § 8585-8589.

California Environmental Quality Act, CEQA Guidelines, 2010.

California Environmental Quality Act, Public Resources Code 21000-21178; California Code of Regulations, Guidelines for Implementation of CEQA, Appendix G, Title 14, Chapter 3, §15000-15387.

California Health & Safety Code Chapter 6.95 and §25316 and §25117.

California Health & Safety Code Section 2000-2067.

California Integrated Waste Management Act. Public Resources Code, Division 30, Waste Management, Sections 4000-41956.

California Native American Graves Protection and Repatriation Act, (AB 978), 2001.

California Natural Diversity Database, 2009.

California Register of Historical Resources. Public Resources Code. §5024.1.

California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm)

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LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON RAMONA GRASSLANDS PRESERVE PROJECT DRAFT MITIGATED NEGATIVE DECLARATION, RESOURCE MANAGEMENT PLAN, VEGETATION MANAGEMENT PLAN

The following is a listing of the names and addresses of persons, organizations, and public agencies that provided general comments for the Ramona Grasslands Preserve Project Draft Mitigated Negative Declaration, Resource Management Plan, and Vegetation Management Plan during the specified public review period of November 17, 2011 – January 17, 2012. In addition to the list below, the Governor's Office of Planning and Research (State Clearinghouse) submitted a letter confirming receipt of the environmental documents and compliance with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act (CEQA).

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U.S. Fish and Wildlife Service Carlsbad Fish & Wildlife Office (Joint letter with CDFG)	Karen A. Goebel 6010 Hidden Valley Rd. Carlsbad, CA 92011
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Form Letter I (50)	

Memorandum

TO: File
FROM: Megan Hamilton, Group Program Manager
SUBJECT: Ramona Grasslands Preserve Project Draft Initial Study/Mitigated Negative Declaration
STAFF RESPONSE TO COMMENTS
DATE: May 21, 2013

This letter includes staff's response to comments received during the public review period for the Ramona Grasslands Preserve Project Draft Initial Study/Mitigated Negative Declaration, which was circulated for public review from November 17, 2011 to January 17, 2012.

Based on comments received during public review and subsequent meetings with the Wildlife Agencies, the project description has been revised to (1) remove the trail in the NW portion of the Preserve from the formal trail network and (2) incorporate three phases of trail construction and recreation use within the Preserve (see revised Figure 3 in the IS). Phase I will include the trails, staging area, and associated infrastructure in the NE portion of the Preserve. Phase II will involve connecting the existing Oak Country II Trail system to Phase I trails in the NE portion of the Preserve. This will include 0.8 mile of new trail with a crossing of Santa Maria Creek, construction of a pathway on the west side of Rangeland Road, installation of road crossing signage, and construction of 0.4 mile of new trail within the RMWD easement. Phase III is a future phase that, if feasible, will construct pathways along the southern portion of Rangeland Road and along Highland Valley Road ultimately connecting the NW and NE portion of the Preserve to the Oak County staging area. As a result of the changes outlined above, management directives and implementation measures have been revised and added to the RMP. These changes are described below in staff's responses to comments.

Response to U.S. Fish and Wildlife Service and California Department of Fish and Game joint letter received January 6, 2012

A-1 As noted in Section 2.4.3 of the Resource Management Plan, the acquisition of a majority of the Preserve was facilitated by The Nature Conservancy (TNC), and the County acquired the properties within the Preserve from TNC. The acquisition of the properties came with associated conservation easements and deed restrictions from TNC. In addition, the grant funds used by TNC to purchase the properties required not only management for the benefit of wildlife, but in specific portions of the Preserve (including the northwest portion) also required public access be provided. The 2007 Proposition 50 Subgrant Agreement (R81762-O) specifically states, "Grantee shall provide for public access to the Project in accordance with the intent of the Act". Thus, the public access plan that

was analyzed in the Initial Study included a trail in the NW portion of the Preserve (Figure 3).

However, based on comments received during the public review, the project description had been revised. Specifically, Figure 3 of the Initial Study has been revised (Figure 3-Revised) and the following paragraph has been added to the "Description of Project" included in the Initial Study, "There is an existing ranch road that traverses the NW portion of the Preserve in a north, and then northwesterly direction, known as Old Survey Road 97. Although this route is no longer formally part of the proposed trail network, it will possibly be open for public access during docent-led tours at appropriate times of the year—as determined by monitoring. Near the northwest corner of the NW portion of the Preserve, the existing Old Survey Road 97 splits into a southern and northern route. The southern route will be closed and passively restored as habitat."

Trail phasing measures have also been incorporated into the IS and RMP. The "Description of Project" in the IS has been revised as follows:
"Trail and Pathway Implementation Plan (Phases I, II & III)

Trail construction and recreational use within the Preserve is proposed in three phases (Figure 3-Revised):

- Phase I will include the trails, staging area, and associated infrastructure in the NE portion of the Preserve.
- Phase II will involve connecting the existing Oak Country II Trail system to Phase I trails in the NE portion of the Preserve. This will include 1.40.8 miles of new trail with a crossing of Santa Maria Creek, construction of a pathway on the west side of Rangeland Road, installing road crossing signage and construction of 0.4 mile of new trail within the RMWD easement.
- Phase III is a future phase that, if feasible, will construct pathways along the southern portion of Rangeland Road and along Highland Valley Road ultimately connecting the NW and NE portion of the preserve to the Oak Country staging area."

Figure 3 (Trails Fencing and Gates) in the RMP has been revised to depict the revised trail project and the three phases. Section 2.5 of the RMP has specifically been revised to include the following, "The implementation of the trail system will be completed in three phases. Phase I will include the trails, staging area, and associated infrastructure in the NE portion of the Preserve (Figure 3). Phase II will involve connecting the existing Oak Country II Trail system to Phase I trails in the NE portion of the Preserve. This will include 0.8 mile of new trail with a crossing of Santa Maria Creek, construction of a pathway on the west side of Rangeland Road, installation of road crossing signage, and construction of 0.4 mile of new trail within the RMWD easement. Phase III is a future phase that, if

feasible, will construct pathways along the southern portion of Rangeland Road and along Highland Valley Road ultimately connecting the NW and NE portion of the Preserve to the Oak Country staging area." The preparation and implementation of a Golden Eagle/Raptor Foraging Study will be considered during the preparation of the County's Comprehensive Monitoring Program.

The proposed trail and pathway alignments have been designed to utilize existing dirt roads and trails to the maximum extent feasible to minimize ground disturbance and so as not to interfere with the conservation of biological resources. In addition, construction of new trails and staging areas and the proposed bridge crossing the Santa Maria Creek occur along the boundaries of the Preserve; an alternative creek crossing has also been analyzed offsite which would further minimize potential impacts if coordination with the RMWD is successful and if the proposed Santa Maria Wastewater Treatment Plant expansion project is constructed. The preferred trail and pathway alignments were developed after a series of stakeholder meetings and represent a compromise that the County believes provides both protection and management of sensitive resources and a safe recreational experience.

A-2 Comment noted.

A-3 The County disagrees that the proposed project, which includes not only the construction of non-motorized multi-use trails but also the implementation of the Preserve Vegetation Management Plan (VMP) and Resource Management Plan (RMP), would result in disturbance to the golden eagle to the degree that causes or is likely to cause decreased productivity or nest abandonment. However, as a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description had been revised. Specifically, the following paragraph has been added to the "Description of Project" included in the Initial Study, "There is an existing ranch road that traverses the NW portion of the Preserve in a north, and then northwesterly direction, known as Old Survey Road 97. Although this route is not formally part of the proposed trail network, it will possibly be open for public access during docent-led tours at appropriate times of the year—as determined by monitoring. Near the northwest corner of the NW portion of the Preserve, the existing Old Survey Road 97 splits into a southern and northern route. The southern route will be closed and passively restored as habitat." In addition, the RMP includes measures that provide additional protections for the golden eagle; including annual surveys to determine if the off-site nest is occupied during breeding and nesting season and seasonal trail closures, as necessary.

Furthermore, to minimize indirect impacts to golden eagles,

Implementation Measures have been added to the RMP including: trail use monitoring to determine if recreational access is indirectly impacting nesting or foraging; signage stating "Sensitive Habitat" will be placed to deter off-trail use along the trails in the NW portion of the Preserve; cactus thickets will be planted along the portions of the trail within the NW portion closest to the known off-site nesting location to deter off-trail use; and trail openings will be phased allowing for trail use studies to be performed for use in informing the need for seasonal closures of trails.

Specifically, the RMP has been revised to include the following:

Avoidance and Minimization Measures for golden eagle:

"**Implementation Measure A.4.20**: DPR will close and passively restore an existing trail that occurs within 0.5 mile of a known nest location in the NW portion of the Preserve to prevent human disturbance to potential golden eagle nesting.

Implementation Measure A.4.21: There will be on-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known off-site nest locations to determine occupancy during the breeding period (December through June).

Implementation Measure A.4.22: DPR will place signage stating "Sensitive Habitat" to deter off-trail use along the trails in the NW portion of the Preserve.

Implementation Measure A.4.23: DPR will plant cactus thickets along the portions of the trail within the NW portion of the Preserve closest to the known off-site nesting location of golden eagles to deter off-trail use."

Specifically, the MND has been revised to include the following:

"11. The following avoidance and minimization measures for golden eagle shall be implemented:

a. Closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known nesting location.

b. On-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known off-site nest locations to determine occupancy during the breeding period (December through June).

c. DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts to golden eagles.

d. Planting of cactus thickets along the portion of the trail within the NW portion of the Preserve closest to the known off-site golden eagle nesting location to deter off-trial use.

e. Installation of fencing, signage or other barriers to avoid off-trail disturbance to known breeding locations, foraging habitat, and preferred perch spots.

f. Development and implementation of passive and/or active restoration of abandoned trails and other areas that may encourage off-trail activities.

g. Continued maintenance to control the spread of invasive exotic plant species within the Preserve."

A-4a The County believes a stand-alone Eagle Conservation Plan is not necessary as the revised RMP and MND include additional avoidance and minimization measures related to golden eagles as stated in the responses to comments A-1 and A-3.

A-4b These avoidance and minimization implementation measures will ensure that no disturbance as defined by the Bald Eagle and Golden Eagle Protection Act (BEGEPA) will occur and thus a take permit is not necessary. See also responses to comments A-1 and A-3.

A-5 The Section IV(e) of the IS has been revised to include the following discussion that demonstrates compliance for golden eagle coverage: "Additionally, the MSCP Subarea Plan identifies anticipated conservation levels for covered species. Table 3-5 states that golden eagle is covered because local populations are not critical to, and the Plan will not adversely affect the long-term survival of this species. Development of Plan has resulted in less than 20% loss of habitat in San Pasqual nesting territory as evidenced by a cumulative analysis of projects within golden eagle nesting territory (on file with DPR). Thus, in accordance with coverage requirements, nesting territory should remain viable."

Furthermore, the revisions to the project description and additional avoidance and implementation measures detailed in responses to comments A-1 and A-3 (and depicted on the revised Figure 3 in the IS) will also ensure that the off-site golden eagle nest that occurs in the MSCP Subarea Plan area will remain viable.

A-6 The project would result in direct impacts on no more than 1.3 acres of arroyo toad critical habitat resulting from the temporary staging area, creek crossing, and new trail construction in the NW portion of the

Preserve. California gnatcatcher critical habitat will not be impacted by the project as the formerly proposed realigned section of the existing north-south trail in the NE portion of the Preserve has been eliminated and this section of trail will now follow the existing trail alignment. Appropriate sections of the Ramona Grasslands Preserve documents and associated figures have been revised to reflect this change.

A-6a Comment noted

A-6b Comment noted

A-6c The IS includes a quantification of potential impacts (both direct and indirect) to arroyo toad. The project would result in direct impacts to no more than 1.3 acres of arroyo toad aestivation upland and breeding wetland habitat resulting from the temporary staging area, creek crossing, and new trail construction in the NW portion of the Preserve. To acknowledge impacts to critical habitat for this species, Section IV(a) of the IS has been revised to include the word 'critical'.

In addition, trail maintenance activities within the vicinity of suitable/occupied toad critical habitat have the potential to result in impacts to the arroyo toad.

Section IV(a) of the IS has been revised to state that no impacts would occur to California gnatcatcher critical habitat as the formerly proposed trail re-alignment in the NE portion of the Preserve has been eliminated: "The NW and NE portions of the Preserve support designated critical habitat for the gnatcatcher. No new trails or infrastructure would occur within California gnatcatcher critical habitat"

Section IV(a) of the IS has been revised to include potential impacts to San Diego fairy shrimp critical habitat:
"San Diego fairy shrimp occur within the Preserve but not in the vicinity of proposed new trails or associated improvements/facilities. Critical habitat for the species extends on the SW and SE portions of the Preserve. The proposed establishment, maintenance, and management of the Preserve would protect vernal pools and known populations of San Diego fairy shrimp thus there are no direct or indirect negative impacts to this species or its critical habitat."

Section IV(a) has been revised to include potential impacts to spreading navarretia critical habitat:
"Although not detected, spreading navarretia (*Navarretia fossalis*) has a high potential to occur and the NE corner of the SE portion of the Preserve is designated critical habitat for this species. There are no direct or indirect

impacts to spreading navarretia critical habitat as discussed further below."

A-6d A thorough discussion of potential indirect and direct impacts and potential take of arroyo toad and SKR has been included in the IS/MND and Biological Resources Report. Please refer to section IV(a) of the IS. No changes were made to the CEQA documents.

A-6e A list of arroyo toad avoidance and minimization measures has been included in the MND. Please refer to Section 2. Required Mitigation Measures, A. Biological Resources.

The following additional SKR mitigation measures have been included in the MND, in accordance with those that were provided for the Oak Country II Trails project.

"In order to avoid potential impacts to Stephens' kangaroo rats, the following measures shall be implemented:

a. Prior to initiating any construction work at the staging area SKR exclusionary fencing shall be installed

b. Once fencing is installed, focus surveys for SKR will be conducted prior to construction of the staging area.

c. In order to render the staging area unsuitable for SKR (i.e., minimize the risk of attracting additional SKR into the staging area impact area), the County will first initiate the import and placement of 10 to15 cm (4 to 6 in) of decomposed granite (DG) on the driving and parking surfaces.

d. If SKR are found, prior to importing and placing the DG, a qualified SKR biologist will complete 3 nights of exclusion trapping at least 24 hours, and no more than 72 hours, in advance of the ground disturbing activity. All traps will be placed within the staging area. Prior to the first night of trapping, and each subsequent night of trapping, the entrances to all potential SKR burrows within the staging area will be cleared of debris and brushed to clear away all signs of activity. All burrows will be checked in the morning following trapping to determine if there was SKR activity at the burrow during the trapping session. Following the final night of trapping, the number of burrows showing SKR activity will be quantified and reported to the Service's CFWO and Department. SKR that are trapped are expected to be held for a period of no more than 72 hours, until the import and placement of DG within the staging area is initiated. SKR procurement and holding conditions will follow the 2007 "Guidelines of the American Society of Mammalogists for the

Use of Wild Mammals in Research" (Gannon et al. 2007). Animals will be kept in solitary enclosures while in captivity to reduce the potential for injury or disease transmission and will be released into the SKR management area at Oak Country, the emergency access mowed area or other location determined in consultation with the Service CFWO and the Department. The release will be into artificial burrows as designed and previously approved for Oak Country.

e. Prior to importing and placing DG, the qualified SKR biologist will determine the status of burrows within the staging area, if any, and if it is practicable to avoid, will flag any potential SKR burrows and create a 3 to 4.5-meter (m) [10 to 15-foot(ft)] buffer around the burrow to encompass the entire underground portion of the burrow complex. All areas to be avoided will be clearly marked on project maps and provided to the contractor. The qualified SKR biologist will be on site daily while construction and/or surface disturbing activities are taking place to ensure compliance with these avoidance and minimization measures."

f. A biological monitor shall be present during all trail and staging area construction and major trail/staging area maintenance within suitable/occupied SKR habitat to ensure avoidance of occupied burrows.

g. Prior to conducting trail/staging area maintenance activities in areas known to support SKR, a qualified biologist shall mark all occupied or potentially occupied burrows. Marked burrows shall be avoided by a distance of no less than a 10-15 foot buffer around the burrow to encompass the entire underground portion of the burrow complex.

h. Trail maintenance will not create berms 5 inches or higher.

i. Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic."

A-7a Comment noted. It is understood that a majority of the Preserve is located in the Draft North County Plan boundary.

A-7b In the event trail maintenance or projects associated with the RMP and VMP will be implemented and are found to result in "take" of federally listed threatened or endangered species that do not involve a federal nexus, then "take" authorization will be obtained through the development of a Habitat Conservation Plan pursuant to section 10 of the FESA. Implementation of the RMP and VMP not related to projects potentially

impacting federally listed threatened or endangered species will move forward (e.g., monitoring, grazing, closure of redundant trails). Trail construction and recreational use within the Preserve will occur in three phases. The first phase of the trail development including the trails and staging area in the NE portion of the Preserve will be constructed before finalization of the North County Plan. This phase is not anticipated to result in impacts to federally or state listed species. However, if listed species are detected in these areas prior to construction of Phase I, Section 10 consultation will be sought as a federal nexus does not exist for this portion of the Preserve. The second phase of development includes a bridge crossing of Santa Maria Creek. A federal nexus is associated with the construction of the bridge crossing of Santa Maria Creek in the NW portion of the Preserve, so Section 7 consultation will be sought during permitting for this second phase of trail development, which includes connecting the existing Oak Country II trail system to Phase I and will construct the crossing of Santa Maria Creek.

A-7c Comment noted. Trail maintenance and implementation of the RMP and VMP will not begin until all necessary take authorizations are obtained. In addition, trails will not be open to the public until the County has implemented the Preserve trail maintenance and management program. This will include the avoidance and minimization measures detailed in responses to comments A-1 and A-3

A-8 Comment noted. The IS/MND and BTR analyze the anticipated impacts to sensitive biological resources resulting from the proposed project, including the construction and maintenance of the proposed trail network, and propose mitigation measures to reduce impacts to less than significant.

A-9 Comment noted. Based on USFWS (1999)[1] and Richardson and Miller (1997)[2] the recommended buffer from an occupied golden eagle nest site is 0.5 mile. Richardson and Miller base their recommendation on three data points that have a range of 0.1 to 1.0 mile. Additionally, flushing distance for golden eagles in response to disturbance by pedestrians is cited as .25 mile. The project description has been revised as a result of comments received during public review and phasing of trail construction has been proposed (see revised Figure 3 in the IS and responses to comments A-1 and A-3). As currently proposed, the closest Preserve trail segment is more than one mile away from the off-site golden eagle nesting site (and Old Survey Road is more than half a mile away).

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[1] US Fish and Wildlife Service. 1999. Utah Field Office Guidelines for Protection of Raptors from Human and Land Use Disturbances. Salt Lake City office, USFWS. Prepared by Laura Romin and James A. Muck. 45pp.

[2] Richardson and Miller. 1997. Recommendations for Protecting Raptors from Human Disturbance: a Review. Wildlife Society Bulletin 25(3):634-638.

As stated in the Biological Technical Report[3], impacts to foraging habitat are minimal (6.27 acres of impact to non-native grassland within the approximately 3,490-acre Preserve, which supports over 1,400 acres of non-native grasslands). This represents a loss of less than 1 percent of the foraging habitat in the Preserve. The RMP includes implementation measures to enhance foraging habitat within the Preserve including: passive and/or active restoration of abandoned trails and other areas that may encourage off-trail activities; implementation of a fire management plan to maintain and enhance foraging habitat; and continued maintenance to control the spread of invasive exotic plant species within the Preserve. Proposed trails have been located along the edges of the properties within the Preserve as much as possible utilizing existing trails and by constructing new trails. Trails that were proposed to cross large contiguous areas of non-native grassland were removed from consideration. In addition, foraging behaviors appear to be relatively unaffected by passive recreational use. The ability for bird watchers in the Ramona Grasslands to regularly observe the foraging behavior of raptor species (e.g., annual Hawk Watch held by the Wildlife Research Institute) indicates that passive recreation likely has a minimal effect on foraging activities by these species[4].

A-10 Based on comments received during the public review, the project description had been revised. Specifically, the following paragraph has been added to the "Description of Project" included in the Initial Study, "There is an existing ranch road that traverses the NW portion of the Preserve in a north, and then northwesterly direction, known as Old Survey Road 97. Although this route is not formally part of the proposed trail network, it will possibly be open for public access during docent-led tours at appropriate times of the year—as determined by monitoring. Near the northwest corner of the NW portion of the Preserve, the existing Old Survey Road 97 splits into a southern and northern route. The southern route will be closed and passively restored as habitat." See also revised Figure 3 in the IS and responses to comments A-1 and A-3.

A-11 Comment noted. The IS, BTR, and RMP have been revised to address the additional golden eagle pairs that could potentially forage in the Preserve. In addition, the project description has been revised as outlined in responses to comments A-1 and A-3. The conclusions outlined in the environmental documents related to the project's potential impacts to golden eagle have not changed as a result of this discussion of the two

[3] ICF International. 2011. Biological Resources Report for the Ramona Grasslands Preserve Project. Prepared for the County of San Diego Department of Parks and Recreation

[4] Technology Associates International Corporation. 2011. Study to Evaluate Potential Impacts to Raptor Foraging Habitat by the proposed Cummings Ranch Project.

additional golden eagle pairs in the project vicinity. Also see response to comment A-9. Specifically the section IV(a) of the IS has been revised as follows:

"There are three nesting territories nearby including the San Pasqual pair (within MSCP) and the Mt. Woodson territory (outside MSCP). While approximately 6.27 acres of foraging habitat and potential courtship areas (non-native grassland) would be directly impacted by the project, the remainder of the non-native grasslands within the Preserve (over 1,400 acres) would be available for foraging and mating. This represents a loss of less than 1 percent of the foraging/courtship habitat in the Preserve. Thus, impacts to foraging/courtship habitat are minimal and will not affect foraging/courtship behavior of nesting eagles in the vicinity of the Preserve."

Please also refer to response to comment A-3, which discusses that additional implementation measures have been added to further evaluate and consider trail use patterns at the Preserve in relation to foraging golden eagles and raptors. As mentioned in responses to comments A-1 and A-3, phasing of the trail plan will also allow for DPR to determine high frequency foraging areas within the Preserve and the data will be used to modify phasing and management of the trails as necessary to ensure impacts do not occur to golden eagles.

A-12 Comment noted. See responses to comments A-3, A-9, and A-11 regarding indirect impacts to foraging and courtship habitat. In addition, the IS and Biological Technical Report have been revised to address the indirect impacts to foraging and courtship behaviors of golden eagles. Specifically the IS has been revised as follows:

While approximately 6.27 acres of foraging habitat and potential courtship areas (non-native grasslands) would be directly impacted by the project, the remainder of the non-native grasslands within the Preserve (over 1,400 acres) would be available to foraging and mating. This represents a loss of less than 1 percent of the foraging/courtship habitat in the Preserve. Thus, impacts to foraging/courtship habitat are minimal and will not affect foraging/courtship behavior of nesting eagles in the vicinity of the Preserve.

A-13 The Biological Resources Report has been revised to remove the statement "as funding is available." In addition, Section 1.2.4 of the RMP has been revised to state the following, "The County allocated general funds for costs to implement the MSCP, including funding for land management, stewardship, and adaptive management and monitoring. The County Board of Supervisors approved approximately $4.7 million of General Fund allocations for implementation of the MSCP for fiscal years

2009-10 and 2010-11 (County 2010a). Base funding for land management costs will be maintained for baseline preserves owned by the County and will be increased as lands are acquired in the future. The County estimates that current funding levels will provide for adaptive management and monitoring on all currently owned preserve lands. Future regional funding sources are also anticipated to fund adaptive management and monitoring activities throughout the preserve system."

A-14a The implementation measure in the public review version of the RMP stated:

"If the known offsite nest location is occupied, DPR may implement seasonal closure of the trail in northwest portion of Preserve (December–July)."

This implementation measure has been deleted. The RMP has been revised to include new implementation measures, including the following:

> "**Implementation Measure A.4.21**: There will be on-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known off-site nest location to determine occupancy during the breeding period (December through June)."

Baseline information regarding golden eagle foraging locations and frequency is addressed by Implementation Measure A.4.17 (Annually conduct qualitative surveys for golden eagle, noting the location and number of individuals). Monitoring of numbers and types of trail users is already proposed in the RMP. Please refer to Implementation Measures C.2.3 and A.4.18.

A-14b DPR does not agree that an eagle monitoring plan is required. However, a Raptor/Golden Eagle Foraging Study will be considered during the preparation of the County's Comprehensive Monitoring Program. As detailed in response to comment A-3, additional implementation measures have been incorporated into the RMP in order to determine baseline golden eagle and raptor foraging conditions at the Preserve. DPR will use this data to manage the trails at the Preserve to ensure impacts do not occur to foraging golden eagles.

A-15 Thank you for this comment. The measures in the Conservation Analysis were inadvertently not included in the RMP and MND. The RMP and MND have been revised. Specifically, Implementation measures have been added to Section 5.2.2 of the RMP and Section 11 has been added to the MND as follows:

"11. The following avoidance and minimization measures for golden eagle shall be implemented:

a. Closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known nesting location.

b. On-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known off-site nest locations to determine occupancy during the breeding period (December through June).

c. DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts to golden eagles.

d. Planting of cactus thickets along the portion of the trail within the NW portion of the Preserve closest to the known off-site golden eagle nesting location to deter off-trail use.

e. Installation of fencing, signage or other barriers to avoid off-trail disturbance to known breeding locations, foraging habitat, and preferred perch spots.

f. Development and implementation of passive and/or active restoration of abandoned trails and other areas within the Preserve that may encourage off-trail activities.

g. Continued maintenance to control the spread of invasive exotic plant species within the Preserve."

A-16a A staging area in the NE portion of the Preserve is necessary to provide safe and adequate parking and access to the Preserve. No revisions are required as a result of this comment.

A-16b Updated SKR surveys will be required prior to construction of the staging area, which is proposed to be constructed as part of Phase I of the project (see revised Figure 3 of the IS). This requirement has been added to the MND.

A-16c The following additional SKR mitigation measures have been included in the MND, in accordance with those that were provided for the Oak Country II Trails project.

"In order to avoid potential impacts to Stephens' kangaroo rats, the following measures shall be implemented:

a. Prior to initiating any construction work at the staging area SKR exclusionary fencing shall be installed

b. Once fencing is installed, focus surveys for SKR will be conducted prior to construction of the staging area.

c. In order to render the staging area unsuitable for SKR (i.e., minimize the risk of attracting additional SKR into the staging area impact area), the County will first initiate the import and placement of 10 to15 cm (4 to 6 in) of decomposed granite (DG) on the driving and parking surfaces.

d. If SKR are found, prior to importing and placing the DG, a qualified SKR biologist will complete 3 nights of exclusion trapping at least 24 hours, and no more than 72 hours, in advance of the ground disturbing activity. All traps will be placed within the staging area. Prior to the first night of trapping, and each subsequent night of trapping, the entrances to all potential SKR burrows within the staging area will be cleared of debris and brushed to clear away all signs of activity. All burrows will be checked in the morning following trapping to determine if there was SKR activity at the burrow during the trapping session. Following the final night of trapping, the number of burrows showing SKR activity will be quantified and reported to the Service's CFWO and Department. SKR that are trapped are expected to be held for a period of no more than 72 hours, until the import and placement of DG within the staging area is initiated. SKR procurement and holding conditions will follow the 2007 "Guidelines of the American Society of Mammalogists for the Use of Wild Mammals in Research" (Gannon et al. 2007). Animals will be kept in solitary enclosures while in captivity to reduce the potential for injury or disease transmission and will be released into the SKR management area at Oak Country, the emergency access mowed area or other location determined in consultation with the Service CFWO and the Department. The release will be into artificial burrows as designed and previously approved for Oak Country.

e. Prior to importing and placing DG, the qualified SKR biologist will determine the status of burrows within the staging area, if any, and if it is practicable to avoid, will flag any potential SKR burrows and create a 3 to 4.5-meter (m) [10 to 15-foot(ft)] buffer around the burrow to encompass the entire underground portion of the burrow complex. All areas to be avoided will be clearly marked on project maps and provided to the contractor. The qualified SKR biologist will be on site daily while construction and/or surface disturbing activities are taking place to ensure compliance with these avoidance and minimization measures.

f. A biological monitor shall be present during all trail and staging area construction and major trail/staging area maintenance within suitable/occupied SKR habitat to ensure avoidance of occupied burrows.

g. Prior to conducting trail/staging area maintenance activities in areas known to support SKR, a qualified biologist shall mark all occupied or potentially occupied burrows. Marked burrows shall be avoided by a distance of no less than a 10-15 foot buffer around the burrow to encompass the entire underground portion of the burrow complex.

h. Trail maintenance will not create berms 5 inches or higher.

i. Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic."

A-17 The County acknowledges the discussion on August 30, 2011 regarding the proposed staging area in the northeast portion of the Preserve and the Montecito Ranch facility and the potential for changes in size depending on the timing of construction of these facilities. However, the analysis of the proposed project cannot rely on the potential future construction of the Montecito Ranch facility. No changes to the MND or RMP have been made as a result of this comment.

A-18 The SKR discussion in Section 5.2.2 of the RMP (MSCP Covered Species-Specific Monitoring and Management) includes reference to the 3-acre Long Term SKR Management Area and specific implementation measures are already included for this 3-acre area (A.4.30 through A.4.33, previously A.3.29 through A.3.32). The following management measures for this area have been added to the SKR discussion in Section 5.2.2 of the RMP (MSCP Covered Species-Specific Monitoring and Management):

"Management: Habitat Maintenance/Species Specific

The management approach for this species is focused on regulating the grazing intensity within identified core Stephens' kangaroo rat habitat within the Preserve and controlling invasive nonnative plants within identified core Stephens' kangaroo rat habitat.

The management of the Long Term SKR Management Area will be in accordance with the Biological Opinion for the Oak Country II trails project.

The Long Term SKR Management area will be maintained such that thick and/or structured vegetative cover (i.e., *Bromus* sp, *Avena* sp., *Brassica* sp., *Foeniculum* sp., shrubs) does not exceed 30 percent cover. The area will be enhanced and then maintained and managed as follows:

a) Mowing of the 3-ac area will occur prior to the existing vegetation setting seed;

b) All mowing will be done using a flail mower;

c) All cut vegetation will be removed upon the completion of mowing;

d) The area will be qualitatively assessed for vegetative cover twice per year, once in late winter/early spring and once in late spring/early summer. The number of mowing cycles required will be based on the amount of vegetation growth in a given year (i.e., years with high rainfall may require 2 mowing cycles and years with low rainfall may not require any mowing). At no time will the thick and/or structured vegetative cover (i.e., *Bromus* sp., *Avena* sp., mustard, fennel, shrubs) vegetative cover exceed the 30 percent cover limit;

e) The County will submit an annual report to the Service's CFWO and the Department documenting all maintenance activities that were completed.

Following implementation of the RMP, maintenance of this 3-acre area may be done by mowing, as described above, by grazing if a grazing plan has been developed and approved for this area, or by other methods with written concurrence from the Service and the Department. It is expected the area will become self-maintaining once seed banks are controlled."

In addition, Section 2.4.3 of the RMP (under the heading Long-Term Stephens' Kangaroo Rat Management Area) references the Biological Opinion for the Oak Country II Trail Project and states that the management of the 3-acre area is part of the RMP. This section of the RMP has been revised to clarify that maintenance of the 3-acre area will be conducted in compliance with the Biological Opinion.

A-19 Mitigation measure 2(A)(4)(g) (formally 2(A)(4)(b)), on page 5 of the draft MND, has been revised as follows: "Prior to conducting trail/staging area maintenance activities in areas known to support SKR, a qualified biologist shall mark all occupied or potentially occupied burrows. Marked burrows shall be avoided by a distance of no less than a 10-15-foot buffer around the burrow to encompass the entire underground portion of the burrow complex."

Associated revisions have been made to the Biological Resources Technical Report (MM-Bio-3c) and implementation measure C.5.8 in the RMP.

A-20 Implementation Measure C.5.10 has been added to the RMP to address

this comment; "All piles of loose dirt will be covered prior to the end of each work day to assure that SKR do not burrow into the loose dirt, thus minimizing the potential for take of additional SKR."

A-21 The provided wording has been included in the MND as mitigation measure 2(A)(4)(i), in the RMP as Implementation Measure C.5.11, and in the BTR under mitigation measure MM-Bio-3c. Specifically, in the MND 2(A)(4)(i) was added as follows: " Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic."

A-22 Mitigation measure 2(A)(3)(a) on page 3 of the MND has been revised as requested and associated revisions have been made to the BTR (MM-Bio-3b). The IS/MND, Biological Resources Technical Report, and RMP have been revised to consistently reference the arroyo toad breeding season as March 15 through July 31.

A-23 Mitigation measure 2(A)(3)(b) on page 3 of the MND has been revised as requested and associated revisions have been made to the BTR (MM-Bio-3b). No revisions to the RMP or VMP are required as a result of this comment.

A-24 Mitigation measure 2(A)(3)(f) on page 3 of the MND has been revised as requested and associated revisions have been made to the BTR (MM-Bio-3b). No revisions to the RMP or VMP are required as a result of this comment.

A-25 The County does not believe that a detailed "eradication plan" needs to be prepared at this time for the proposed project. Such a plan may be developed and attached to future monitoring reports, as needed. No revisions to the CEQA documents are required as a result of this comment.

A-26 The County acknowledges and agrees with the comment. However, use of the Ramona Municipal Water District (RMWD) lands for the proposed trail and crossing of Santa Maria Creek is contingent on (1) approval and construction of the RMWD's Santa Maria Wastewater Treatment Plant project and (2) successful negotiations with RMWD to utilize their creek crossing and roadway as part of the dedicated trail network. DPR will continue to pursue the proposed creek crossing within the NW portion of the Preserve. No revisions to the CEQA documents are required as a result of this comment.

A-27 Page 1-18 of the BTR states the following, "Coastal California gnatcatcher was not identified on site during 2009 surveys; however, this species has

historically been detected in and adjacent to the Preserve." Protocol surveys for the gnatcatcher were not conducted for the proposed project; however, focused avian surveys were conducted as part of the inventory surveys conducted between 2009 and 2011 and this species was not detected. Biological surveys conducted in 2003 for the previously proposed development project in the southwest portion of the Preserve (referred to as Oak Country Estates) resulted in the identification of one coastal California gnatcatcher during general biological surveys. However, protocols surveys conducted in 2003 determined this species is absent. The reference above (and in the RMP) to the gnatcatcher being historically detected in the Preserve is related to this 2003 observation.

Page 39 of the IS states that the coastal California gnatcatcher was not observed within the Preserve but acknowledges that potentially suitable habitat occurs within the Preserve; currently though most of the coastal sage scrub within the Preserve is not appropriate for this species as it has not yet recovered from the recent fires. The County does not believe the updated gnatcatcher protocol surveys are necessary at this time and no changes were made to the IS/MND. It should be noted that Implementation Measures A.1.2 and A.4.28 in the RMP indicate DPR will conduct general wildlife surveys including surveys for the gnatcatcher as part of the RMP monitoring responsibilities for the Preserve. No revisions to the CEQA documents are required as a result of this comment.

A-28 A Habitat Loss Permit would not be required for this project as a grading permit, improvement plan or clearing permit will not be required (Section 86.102 County Code of Regulatory Ordinances). No revisions to the CEQA documents are required as a result of this comment.

A-29a Focused surveys for special-status species are typically good for a period of one year and it would be more prudent to perform these surveys closer to the time construction is to be initiated. No revisions to the CEQA documents are required as a result of this comment.

A-29b The anticipated impacts to vegetation communities resulting from the construction of off-site trail segments/Pathways are discussed in the IS/MND and BTR and mitigation measures are included requiring habitat assessments and/or focused surveys to be conducted in these areas prior to project implementation. There is a significant amount of data available on the biological resources within the project area and immediate vicinity and it is not expected that focused surveys in these areas would result in the identification of new sensitive resources or the requirement for new mitigation measures not currently addressed in the MND that reduce impacts to less than significant. No revisions to the CEQA documents are required as a result of this comment.

A-30 Page 18 of the Initial Study has been revised to identify the potential need for a Habitat Conservation Plan as requested.

A-31 Page 19 of the Initial Study has been revised to identify the potential need for a California Endangered Species Act permit and a Consistency Determination as requested.

A-32 Comment noted. The purpose of the RMP is to setup a framework to preserve and manage for Stephens' kangaroo rat, burrowing owl, golden eagle, white-tailed kite, wintering raptors, San Diego fairy shrimp, arroyo toad and all biological resources present or that have the potential to occur at the Preserve in the future. The RMP identifies the following Priority 1 action:

"Priority 1: Directives that protect the resources in the Preserve and the North County Plan Preserve, including management actions that are necessary to ensure that sensitive species are adequately protected."

It should be noted that the County anticipates that the RMP will need to be updated upon completion of the North County Plan, as acknowledged in Section 5.2.1 of the RMP. This would include implementing additional monitoring and management actions as necessary to ensure that all covered species that occur at the Preserve will be fully conserved and managed per the final North County Plan. No revisions to the CEQA documents are required as a result of this comment. However, please see revised Figure 3 in the IS and responses to comments A-1 and A-3, which outline changes to the project description and phasing that occurred subsequent to public review.

A-33 The County does not agree that the monitoring priority for western spadefoot toad should be revised to at least a medium priority species. The current Draft North County Plan Framework Resource Management Plan Conservation Analysis lists western spadefoot toad as Low Priority Status Monitoring. Furthermore, existing management directives for the Santa Maria Creek corridor, vernal swales, and vernal pools at the Preserve are sufficient to ensure proper management of western spadefoot toad at the Preserve. In addition to habitat monitoring (See Chapter 5 of the RMP), western spadefoot toads will be monitored for presence/absence at the Preserve on 3 to 5 year intervals. No revisions to the CEQA documents are required as a result of this comment.

A-34 Table 1 of the MND includes a ratio of 1:1 for non-native grasslands and a ratio of 2:1 for coastal sage scrub. While the MND references that final ratios could be subject to change if the North County Plan is approved prior to project implementation, it is not expected that the ratios noted above would be decreased as a result of approval of this plan. Mitigation

will occur in accordance with the MND and in compliance with the Final North County Plan (if approved). As stated in the MND, impacts will be offset by the off-site preservation of habitat, the purchase of mitigation credits within an approved mitigation bank, or in accordance with County Board Policy I-138 at established mitigation ratios. Where mitigation occurs in conformance with the North County Plan (once approved), it would not be subject to approval by the Wildlife Agencies. No revisions to the CEQA documents are required as a result of this comment.

A-35 Comment noted. In addition to the Mitigation Bank Policy (I-117) there is the Mitigation on County-Owned Land Managed by the Department of Parks and Recreation (I-138). No revisions to the CEQA documents are required as a result of this comment.

A-36a The County disagrees that the RMP should be revised to include a list of adjacent property owners and types of ownership/management responsibilities that are required for these properties. Figure 8 was revised to consist of Figures 8a and 8b. Figure 8a shows adjacent land ownership. In addition, Management Directive D.14 of the RMP states: "Coordinate with adjacent land managers with large areas of undeveloped land (Priority 1). Implementation Measure D.14.1 of the RMP states: "DPR will continue to coordinate with the RMWD and the Ramona Airport (in association with their contiguous open spaces) on an annual basis, or more regularly as needed to ensure contiguous preserved land is managed consistently and in accordance with the North County Plan." The following management directive and implementation measure has been added to the RMP regarding monitoring of adjacent biological and open space easements and conserved lands: "Management Directive D.15—Coordinate with adjacent property owners with biological open space easements and conserved lands (Priority 1), Implementation Measure D.15.1: DPR will coordinate with adjacent property owner's with biological and open space easements and conserved lands to perform monitoring within these easements in conjunction with Preserve monitoring".

A-36b A new table including land ownership within and surrounding the Preserve will not be added to the RMP. Figure 8a was added to the RMP showing adjacent land ownership.

A-36c Conserved lands and biological and open space easement data have been added to Figure 8b in the RMP.

A-37 Comment noted. As detailed in responses to comments A-3, A-4a and A-14b the County does not believe that a stand-alone eagle plan is required. The project description and proposed phasing have been revised and additional management measures have been added to the RMP to ensure that recreational use at the Preserve will not directly or indirectly impact

golden eagles or other raptors. The purpose of these new measures will be to determine baseline conditions for golden eagles and raptors at the Preserve and monitor the distribution and abundance of all raptor use within the grasslands and the adjacent habitats. Baseline surveys will analyze both breeding and foraging habitats and will guide management actions that will ensure that the proposed project does not directly or indirectly impact golden eagles or other raptors.

A-38 Section 5.5 Operations and Facility Maintenance Element of the RMP outlines management directives and implementation measures related to operations and maintenance of the Preserve. In addition, Section 1.2.2 Responsible Parties/Designation of Land Manager of the RMP discusses the fact that the Preserve is within the management district of one supervising park ranger, three park rangers, three seasonal, and two volunteers. The information contained in the RMP related to operations and maintenance is consistent with that included in RMPs for other County preserves. No changes were made to the RMP as a result of this comment.

A-39 The RMP acknowledges that the North County Plan is currently a draft plan and that revisions to the RMP including ASMD's will be required in the future, including once the North County Plan is finalized/approved. See Section 5.2.1. See also response to comment A-32 above. Additionally the RMP acknowledges in Section 5.2.1 "Once these methods (*regional monitoring strategies and protocols*) are fully developed and, as feasible, they will be adapted for North County Plan preserves." No changes were made to the RMP as a result of this comment.

A-40 As discussed in Chapter 1.2 and Chapter 5 of the RMP, a portion of the NW area of the Preserve occurs in the South County MSCP plan area but the intention of the County is to manage the Preserve in accordance with the North County Plan Framework Management Plan. The species specific management requirements detailed in Table 3-5 of the MSCP is included in the RMP for species observed in the Preserve that are covered by the MSCP SAP. No revisions to the CEQA documents are required as a result of this comment.

A-41 Refer to response to comment A-40 regarding management of the Preserve under the North County Plan. Since the Preserve will be managed under the North County Plan, the management goals and objectives are from the Draft North County Plan Framework Resource Management Plan. No revisions to the RMP were made as a result of this comment.

A-42a The RMP has been revised to clearly summarize top management issues/stressors. Specifically, the third paragraph of Section 5.2.2 has

been revised as follows:

"The top management issues at the Preserve include protecting the riparian and upland habitat along the Santa Maria Creek for water quality and sensitive species. This will include the removal of invasive, non-native species including *Tamarix*, *Arundo*, crayfish and bullfrogs. Another top management issue will be to maintain and enhance the viability of the Preserve's MSCP covered resources (e.g., golden eagle, arroyo toad, Stephens' kangaroo rat, vernal pools, raptor foraging habitat, rare plants) in the context of the proposed trails."

A-42b Since public access is proposed at the Preserve, trail monitoring will occur. See Implementation Measure C.2.3 in the RMP. DPR will assess trail uses and the potential direct and indirect impact on the conserved resources at the Preserve. If it is determined that trail use at the Preserve is negatively affecting sensitive biological resources, additional management will occur such as placement of signs, bollards etc. See implementation measures associated with Management Directive C.5. No changes were made to the RMP or the MND as a result of this comment.

A-43 Erosions and drainage problems within the Preserve will be monitored according to Section 5.4.3, Trail and Access Road Maintenance of the RMP. No revisions to the RMP were made as a result of this comment.

A-44 Figure 3 in the RMP (Trails, Fencing and Gates) depicts the proposed staging areas, trail access points, and fencing locations (and has been revised to depict the revised project and the proposed phasing). Trash receptacles are not included on this figure; however, they would be located within the identified staging areas. We agree that future locations of trash receptacles and fencing could change; however, this would not change the environmental impact analysis presented in the MND. No revisions to the CEQA documents were made as a result of this comment.

A-45 A table listing Management Directives, Implementation Measures, timeframe, and responsible parties has been added to the RMP as Appendix A. Estimated cost of tasks will be determined by DPR Operations Division each fiscal year.

A-46 See response to comment A-45 and A-39 above.

A-47 As discussed in Chapter 6 of the VMP the Preserve is designated as a State Responsibility Area by the California Board of Forestry and Fire Protection. Therefore, the California Department of Forestry and Fire Protection (CAL Fire) is the entity financially responsible for controlling fires on the Preserve and is the lead agency to conduct Vegetation Management Prescribed Fires. Currently CAL Fire does not recommend any brush clearing or fire break areas at the Preserve. If future brush clearing areas are identified by CAL Fire, DPR will ensure that all County guidelines are followed (e.g., timing of activities outside bird breeding/nesting season and avoidance of narrow endemic plant species) and appropriate mitigation implemented to off-set any future impacts to vegetation associated with fire suppression activities. No revisions to the CEQA documents are required as a result of this comment.

A-48 The Ramona Grasslands Preserve RMP encumbers the currently acquired Preserve lands, DPW mitigation properties, and adjacent properties with biological and open space easements and conserved lands. The RMP acknowledges that revisions to the RMP would be required subsequent to acquisition of additional Preserve lands. See also response to A-39 above. No revisions to the CEQA documents are required as a result of this comment.

A-49 The locations of wildlife movement areas within the Preserve have been documented in the RMP and the Biological Resources Report. Both the MND and the Biological Resources Report evaluate the project's potential direct and indirect impacts to these wildlife corridor areas. The conclusion

of this analysis was the proposed project would not significantly impact wildlife corridor areas. In addition, as detailed in responses to comments A-1, A-3, A-9, A-14a, and A-14b additional baseline raptor surveys will be conducted at the Preserve prior to project implementation. The purpose of these surveys will be to document raptor foraging, breeding and winter migration patterns to ensure that, if needed, management actions can be implemented to minimize direct or indirect impact to both golden eagles and raptors at the Preserve.

A-50 Sections 3.2 and 3.3 of the RMP include the narrow endemic status from the MSCP SAP and North County Plan in the species profiles, including for San Diego thornmint. No revisions to the RMP were made as a result of this comment.

A-51 The Public Access Plan provides recommendations and design guidelines for a non-motorized multi-use trail system in the Preserve and summarizes the planning context for public access in the Preserve. This document is not part of the environmental documentation for the project that was distributed for public review, and as such, responses to comments and suggested revisions specific to the Public Access Plan are not required.

The proposed project does not include trails on private facilities. The cumulative analysis in the IS/MND for the project considered past, present, and reasonably foreseeable future projects including Cumming Ranch and Montecito Ranch.

A-52 As requested, the proposed trail realignment associated with the north-south trail in the NE portion of the project area has been removed and the trail now follows the existing trail alignment. The necessary text and figures within the Cultural Resources Report, Biological Resources Report, Vegetation Management Plan, Resource Management Plan, and IS/MND have been revised/deleted to reflect this change.

A-53 See response to comment A-1 above. Please also note the Preserve does not contain areas occupied by southwestern pond turtle. The RMP addresses the preferred trail alignment, which locates trails on existing disturbed areas/trails and new trails in the least sensitive areas of the Preserve to the extent feasible. Page 2-12 of the RMP states that, "The trail system would utilize existing ranch roads and trails to the greatest possible extent..." No revisions to the RMP are required as a result of this comment.

A-54 The section "New Trails" on page 6 of the Biological Resources Report explains that the new segment would be 10 feet wide so that it matches the width of the existing dirt road that it would be connecting to. No revisions to the BTR are required as a result of this comment.

A-55 See response to comment A-44. Future locations of signs and/or fences to keep users on designated trails would occur within identified impact areas addressed in the Biological Resources Report and IS/MND and would not result in new significant impacts to sensitive biological resources beyond those currently analyzed. No revisions to the CEQA documents are required as a result of this comment.

A-56 The County believes that passive restoration, combined with the use of fencing and signage, is appropriate for existing trails not part of the proposed dedicated trail network. Active restoration is not being proposed as mitigation for any project impacts; therefore, the preparation of a conceptual restoration plan and development of a planting palette is not necessary. In addition, active restoration of historic trails within the Preserve would be considered a significant impact on a historic resource. No revisions to the CEQA documents are required as a result of this comment.

A-57 As detailed in the RMP the grazing prescriptions within the Preserve will be monitored by continuation of a Residual Dry Matter (RDM) analysis program. This program was designed to establish dry matter or biomass ranges that would allow for effective management of SKR, raptors, riparian corridors and vernal pool habitats. RDM analysis will occur on an annual basis to ensure proper management of the grassland resources. No revisions to the RMP were made as a result of this comment.

A-58 Implementation Measure A.1.3 in the RMP says. "DPR will conduct monitoring within the Preserve including the three Ramona Airport Improvement Project mitigation areas for invasive nonnative plant species at 5-year intervals to assess invasion or re-invasion by invasive nonnative plants within the Preserve..." No revisions to the RMP were made as a result of this comment.

A-59 Comment noted. As detailed in Chapter 5 of the RMP SKR and arroyo toad presence/absence surveys will occur on 3 to 5 year intervals. No revisions to the RMP were made as a result of this comment.

A-60 Comment noted. Management Directive D.9 and Implementation Measure D.9.3 in Chapter 5.1 of the RMP detail the proposed hydrological monitoring measures for the portion of Santa Maria Creek within the Department of Public Works Wetland Mitigation Parcel. These measures include monitoring for physical conditions, hydrology and water quality. Management Directive D.4 and Implementation Measures D.4.1 and D.4.2 were added to the RMP to address water quality and channel geomorphology monitoring of Santa Maria Creek.

Management Directive D.4 – Monitor water quality and physical dimensions of Santa Maria Creek (Priority 2).

Implementation Measure D.4.1: Annually, or as dictated by rainfall and stream flow, DPR will monitor water quality upstream and downstream of the Preserve to determine the retention of water quality constituents. Collect samples at established monitoring stations shown in Figure 16 of Ramona Grasslands Preserve Area Specific Management Directives (CBI 2007). Sampling frequency and methods are defined in the Santa Maria Creek Restoration Water Monitoring Quality Assurance Project Plan (City of San Diego Water Department 2004). Analyze samples for suspended solids, nutrients (nitrogen and phosphorus compounds), biological oxygen demand, metals, and bacteria (fecal coliforms, *Enterococcus*). At each monitoring event, collect standard field measurements (temperature, dissolved oxygen, pH, etc.) and, potentially, benthic macroinvertebrates (CDFG 2003).

Implementation Measure D.4.2: DPR will monitor changes in the morphology of the Santa Maria Creek channel by measuring the physical dimensions of the channel and substrate composition along a series of established cross-sections RT1-11 shown in Figure 16 of the Ramona Grasslands Preserve Area Specific Management Directives (CBI 2007). Channel geomorphology should be monitored at 5-10 year intervals, or following major flooding events.

A-61 Monitoring for invasive animal species is addressed through multiple implementation measures under management directive A.5 (formerly A.4), which requires the County to "Reduce, control, or where feasible eradicate invasive non-native fauna known to be detrimental to native species and/or the local ecosystem." No revisions to the RMP were made as a result of this comment.

A-62 Comment noted. DPR will document and track the responses of the proposed management actions detailed in Chapter 5 of the RMP. This data will be held internally at the County and submitted to the San Diego Management and Monitoring Program multi-taxa database. No revisions to the RMP were made as a result of this comment.

A-63 As detailed in Management Directive A.1.1 in the RMP, habitat monitoring will be conducted at the Preserve once every 5 years and would include an assessment of the Preserve in relation to post-fire recovery. In addition, as detailed in Management Directive A.4.28 (formerly A.3.27), California gnatcatcher surveys would also be conducted at the Preserve on 5 year intervals. These surveys would be conducted in conjunction with the

general wildlife monitoring detailed in Management Directive A.1.2. No revisions to the RMP were made as a result of this comment.

A-64 As detailed in Chapter 5.3.1, the County will monitor and restore degraded habitats at the Preserve to protect and enhance conserved resources on site. This includes passively restoring the southern route of Old Survey Road 97 in the NW portion of the Preserve. No revisions to the RMP were made as a result of this comment.

A-65 Comment noted. As detailed in Chapter 1, Chapter 4.4 and Chapter 5 of the RMP, the County recognizes the Preserve as a core grassland area that is a vital connection to open space habitat to the south and north. The Preserve is identified within the North County Plan as Core Habitat Area 13 and is characterized as a linkage that connects San Pasqual Valley to the north with Barnett Ranch and Iron Mountain preserve areas to the south. The Preserve will be managed as a core grassland area. No revisions to the RMP were made as a result of this comment.

A-66 As detailed in the VMP, cattle will be restricted from the Santa Maria Creek riparian corridor in Management Unit 1A for eight (8) months out of the year to allow for passive restoration of riparian/wetland vegetation, to maintain stabilized steam banks, and to reduce pollutants (cattle urine and feces) from entering the creek. Currently Management Units 1B and 1C will be closed to cattle for the entire year until it is determined through RDM monitoring that grazing is required. No revisions to the RMP were made as a result of this comment.

A-67 The RMP has been revised to reflect that both golden eagles and SKR are high priority species at the Preserve.

A-68 As detailed in the RMP a variety of different biological resource monitoring intervals will be implemented at the Preserve. This includes annual surveys, surveys on intervals of 3 to 5 years and intervals of 5 years. In addition the County will coordinate Preserve surveys with the larger MSCP SAP and North County Plan regional monitor efforts. It is understood that the current monitoring protocols for these plans are either being revised or in draft form and upon completion, the County will ultimately need to revise the monitoring section of the RMP to be consistent with all regional monitoring efforts. No revisions to the RMP were made as a result of this comment.

A-69 As detailed in Chapter 5 of the RMP impact avoidance buffers and measures have been provided for all covered raptors identified at the Preserve. This includes monitoring trail use to determine if and where seasonal closures of trails will be necessary (Implementation Measure A.4.18 and establishing a 300-foot nesting buffer for nesting Cooper's

hawk [Table 3-5 of the MSCP SAP]). The RMP has been revised to include additional implementation measures for golden eagle nesting surveys and measures for minimization of indirect impacts to golden eagles (A.4.21-A.4.23). See also revised Figure 3 in the IS and responses to comments A-1 and A-3, which outline the revisions to the project description and proposed project phasing.

A-70 As detailed in Chapter 1.2.1 the County anticipates that the RMP will be revised once every 5 years or as needed. In addition it is noted in the RMP that the RMP may be revised on a shorter time scale if there is a change in circumstance, for example, acquisition of additional Preserve land. Monitoring data will be submitted for inclusion in the multi-taxa database being constructed by the San Diego Management and Monitoring Program. No revisions to the RMP were made as a result of this comment.

A-71 The RMP has been revised to include the definitions of adaptive management included in the Draft North County Plan. Specifically, Section 1.2.1 of the RMP has been revised as follows: "A key concept of the MSCP is the use of "Adaptive Management Techniques" directed at the conservation and recovery of individual species. This term, as defined in the Draft North County Plan, is "a decision process that promotes flexible decision making, which can be adjusted in the face of uncertainties as outcomes from management actions and other events are better understood. Careful monitoring of these outcomes advances scientific understanding and allows for the adjustment of policies and/or operations as part of an interactive learning process. Adaptive management also recognized the importance of natural variability in contributing to ecological resilience and productivity." Adaptive management is particularly useful where there is uncertainty regarding the efficacy of certain management measures and/or the needs of target species. Adaptive management and an associated monitoring program are designed to inform land managers of the status and trends of covered species, natural communities, and landscapes in a manner that provides data to allow informed management actions and decisions."

As stated in response to comment A-40, the intention of the County is to manage the Preserve in accordance with the North County Plan Framework Resource Management Plan and Section 5.1.3 of the RMP describes prioritizing the Management Directives of the ASMDs. The County disagrees that Chapter 5.2 of the RMP should use Priority 1 and 2 specific items rather than the proposed high, medium or low categories of the Draft North County Plan Conservation Analysis.

A-72 The County disagrees that a cowbird trapping program should be included in the revised MND and RMP and identified as Priority 1. The RMP and

baseline surveys of the Preserve documented the presence of cowbirds in 2009 but individuals observed were considered migrants and did not pose a significant threat to native wildlife on the Preserve. However, as detailed in Implementation Measure A.5.2 the County will conduct surveys for brown-headed cowbirds to determine if the species poses a threat to native wildlife at the Preserve, in the event cowbirds are determined to be causing detrimental effects, then a trapping program will be prepared and implemented as stated in Implementation Measure A.5.3 of the RMP. Implementation Measure A.5.4 will also be implemented and it includes implementing an equestrian education program regarding the potential negative impacts on native ecosystem from the accumulation of non-point source pollutants which could cause an increased potential for the occurrence of cowbirds. No revisions to the RMP were made as a result of this comment.

A-73 The southwest portion of Management Unit 1A will be grazed for a 2 to 4 month period outside of the Arroyo Toad breeding season (January to February and August to September). Grazing within this Management Unit is designed to reduce weedy grasses in the upland area and keep the riparian vegetation at a mid-successional range. No revisions to the VMP were made as a result of this comment.

A-74 Section 3.4.2 of the VMP has been revised to clarify that "Cattle will be restricted from the Santa Maria Creek riparian corridor in Management Unit 1A for eight (8) months out of the year to allow for passive restoration of riparian/wetland vegetation, to maintain stabilized steam banks, and to reduce pollutants (cattle urine and feces) from entering the creek. Management Units 1B and 1C will be closed to cattle for the entire year until it is determined through RDM monitoring that grazing is required."

A-75 Section 3.4.2 of the VMP has been revised to clarify that "Grazing in the eastern area of the NW portion (MU 4A) of the Preserve is currently limited to 10 bulls June through November each year and a drinker is available." Suitable arroyo toad breeding habitat does occur within Management Unit 1A, grazing will not occur within this Management Unit during the arroyo toad breeding season (March 15 – July 31).

A-76 The RMP and VMP do not propose active restoration at the Preserve. If future active restoration is proposed, a conceptual restoration plan will be prepared that will include a planting palette for all active restoration areas. No revisions to the RMP or VMP were made as a result of this comment.

A-77 The proposed grazing plan detailed within the VMP closely follows the grazing program that was prepared for the Preserve by the Conservation Biology Institute in 2004. The key elements of this plan were to manage the Preserve for grazing based on soil types and the Santa Maria Creek

riparian corridor. These elements were maintained in the current version of the proposed grazing plan. No revisions to the VMP were made as a result of this comment.

A-78 Figure 3 of the RMP details the existing and proposed fencing at the Preserve. Additional fencing beyond what is displayed in Figure 3 is not proposed. As discussed in section 5.4.2 fencing will be regularly inspected and maintained by DPR. No revisions to the RMP were made as a result of this comment.

A-79 As detailed in the RMP recreational Preserve access will be limited to the proposed trail system. Off-trail access at the Preserve is not proposed. No revisions to the RMP were made as a result of this comment.

A-80 Comment noted. As detailed in Chapter 5.3.4 of the RMP and Chapter 3 of the VMP the grazing management units at the Preserve were designed in order to adequately manage for conserved resources. DPR staff will ensure management of these units is done in a manner to achieve the management objectives of each unit. No revisions to the RMP or VMP were made as a result of this comment.

A-81 Comment noted. The County agrees that the loamy grassland habitats at the Preserve should be managed to maintain suitable conditions for SKR, raptors and rare alkali playa plant species. Chapter 3 of the VMP documents the County's intentions on how they will ensure suitable habitat conditions for SKR, raptors and rare alkali playa plant species within the loamy grassland habitat within the Preserve. No revisions to the VMP were made as a result of this comment.

A-82 Comment noted. The County agrees that the clayey grasslands should be managed to improve the biological functions of the vernal pools by decreasing invasive non-native grasses and forb cover. However, the County disagrees that quantitative measurements of vernal pool plant cover should be required in all vernal pools within the Preserve. The County will conduct surveys for vernal pool plants in conjunction with habitat monitoring and general plant surveys that will be conducted at 5-year intervals as described in implementation measures A.1.1 and A.1.2. Vernal pool plants that will be assessed during these surveys will include but not be limited to spreading navarretia, San Diego thornmint, and southern tarplant. Implementation Measure D.9.2 of the RMP addresses monitoring of vegetative cover of the DPW vernal pool mitigation properties, "Percent vegetative cover and vegetation community composition monitoring at the two vernal pool mitigation areas will be performed by DPR every 3–5 years based on rainfall. Monitoring will occur in conjunction with implementation measure A.1.1. Detailed survey protocols are provided in Appendix B."

The County proposes to document the effectiveness of the grazing management unit in the clayey grasslands through the use of the existing Residual Dry Matter (RDM) analysis program. No revisions to the RMP or VMP were made as a result of this comment.

A-83 As detailed in Chapter 5 of the RMP the Santa Maria Creek corridor will be managed using a variety of different techniques including managed grazing, invasive non-native plant control and biological resources monitoring. Proposed grazing management actions within the Santa Maria Creek corridor are detailed in Chapter 5.3.4 of the RMP and Chapter 3 of the VMP. Specifically Management Units 1A, 1B and 1C include the management areas that contain the Santa Maria Creek riparian corridor. Invasive non-native plant removal activities within the Creek corridor are detailed in Chapter 4 of the VMP. The biological monitoring plan for the Preserve is detailed in Chapter 5 of the RMP and includes surveying every 3 to 5 years for the presence/absence of arroyo toad. Hydrologic water quality and channel characteristic monitoring within the Santa Maria Creek corridor is detailed in Chapter 5.5.2 and includes ensuring that the Preserve is managed to maintain existing natural drainages/watersheds and to restore or minimize changes to natural hydrological processes. The use of Best Management Practices will be implemented to maintain water quality throughout the Preserve. Monitoring riparian vegetation community structure and composition is addressed in the RMP under Implementation Measures A.1.1 and A.1.2 and Management Directive D.9. Monitoring of breeding riparian bird species is addressed in the RMP under Implementation Measure A.1.2. No revisions to the RMP or VMP were made as a result of this comment.

A-84 The grazing management plan and specifically Management Unit 1A is designed to maintain and enhance arroyo toad habitat quality. Monitoring for arroyo toad distribution and presence/absence at the Preserve will occur once every 3 to 5 years as stated in Implementation Measure A.4.13 of the RMP. No revisions to the RMP or VMP were made as a result of this comment.

A-85 As detailed in Management Directive A.1 the monitoring plan at the Preserve includes overall habitat monitoring on 5-year intervals. This would include the Santa Maria Creek riparian corridor. The primary purpose of habitat quality monitoring is to maintain or enhance the Preserve's habitats for wildlife species including riparian-obligate species and breeding birds. No revisions to the RMP or VMP were made as a result of this comment.

A-86 As detailed in Chapter 5.2.2 of the RMP, SKR monitoring will include presence/absence monitoring for SKR on 3 to 5-year intervals. In addition

annual RDM monitoring will be conducted to ensure that the loamy grasslands are being managed to maintain and enhance SKR habitat. Monitoring the abundance and composition of the Preserve raptor community is addressed by Implementation Measure A.1.2 of the RMP. No revisions to the RMP or VMP were made as a result of this comment.

A-87 The County disagrees that annual monitoring of wintering raptors or breeding riparian birds is required. However, Implementation Measure A.1.2 of the RMP includes general wildlife surveys that will include both riparian bird and raptor surveys. In addition, as noted in response to comment A-1, the preparation and implementation of a Golden Eagle/Raptor Foraging Study will be considered during the preparation of the County's Comprehensive Monitoring Program.

A-88 Comment noted.

Response to Native American Heritage Commission letter dated November 21, 2011

B-1 The statement is noted.

B-2 The statement is noted.

B-3 The statement is noted. The results of the cultural resources inventory and assessment are included in the two cultural resources reports prepared for the project, one detailing an inventory of the Preserve, *Cultural Resources Survey and Inventory, Ramona Grasslands Preserve, San Diego County California* (ICF International 2010) and one pertaining to the current project, *Cultural Resources Impact Assessment for the Ramona Grasslands Preserve Project, San Diego County, California* (ICF International 2011). No revisions to the CEQA documents were made as a result of this comment.

B-4 The statement is noted, and the results of an earlier Sacred Lands File search, with the same findings (dated April 29, 2009), are included in the cultural resources report prepared for the project.

B-5 The recommendation is acknowledged and appreciated. Native American contacts identified by the Native American Heritage Commission at the initiation of the project, in a letter dated April 20, 2009, were contacted at that time. Further, a stakeholder meeting to discuss the trails portion of the project was held with the tribes that responded with an interest in the project. This meeting occurred in April 2010. However, the contact list attached to the current comment letter (dated November 21, 2011) contains contacts not included on the earlier letter. A letter describing the

current status of the project has been sent to all contacts on the current NAHC list.

B-6 Please see response to comment B-5 above.

B-7 The recommendation is noted, and the County's preferred treatment for cultural resources is also avoidance, as discussed in the cultural resources report prepared for the project. No revisions to the CEQA documents were made as a result of this comment.

B-8 The statement is noted.

B-9 The statement is appreciated and the County has ensured that sensitive cultural resources information has and will continue to be kept confidential.

B-10 Provisions for the treatment of incidentally discovered archaeological and human remains has been addressed in the IS/MND, the cultural resources technical reports, and the Preserve Resource Management Plan. In the MND, Mitigation Measure 4 for cultural resources reads:

> "All ground disturbing activity related to implementation of the project, including installation of trail signage, potential building removal, trenching, grading associated with trail installation, etc. shall be monitored by a qualified archaeologist and, where the resource involved is a prehistoric archaeological site, by a Native American representative. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until a qualified archaeologist can evaluate the find and make appropriate recommendations for treatment."

Further, in the MND. Mitigation Measure 5 for cultural resources reads:

> "Any ground disturbing activities on the Preserve must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to CEQA Guidelines Section15064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading, Clearing and Watercourses Ordinance.
>
> Should Native American human remains be identified during ground disturbing activities related to the project, whether during construction, maintenance, or any other activity as outlined in the RMP and VMP, state and county mandated procedures shall be followed for the treatment and disposition of those remains, as follows:

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DRP will ensure that the following procedures are followed:

a. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

   1. A County (DPR) official is contacted.

   2. The County Coroner is contacted to determine that no investigation of the cause of death is required. c. If the Coroner determines the remains are Native American, then:

      i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours.

      ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American.

      iii. The Most Likely Descendent (MLD) may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in PRC Section 5097.98.

b. Under the following conditions, the landowner or its authorized representative shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further disturbance:

   1. The NAHC is unable to identify a MLD or the MLD fails to make a recommendation within 24 hours after being notified by the NAHC.

   2. The MLD fails to make a recommendation.

   3. The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner.

c. Any time human remains are encountered or suspected and soil conditions are appropriate for the technique, ground penetrating radar (GPR) will be used as part of the survey methodology. In addition, the use of canine forensics will be considered when searching for human remains. The decision to use GPR or canine forensics will be made on a case-by-case basis through consultation among the County Archaeologist, the project archaeologist, and the Native American monitor.

d. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as:

1. Cremations, including the soil surrounding the deposit.
2. Interments, including the soils surrounding the deposit.
3. Associated grave goods.

In consultation among the County archaeologist, project archaeologist, and Native American monitor, additional measures (e.g., wet-screening of soils adjacent to the deposit or on-site) may be required to determine the extent of the burial."

No revisions to the CEQA documents were made as a result of this comment.

B-11 This statement is noted.

Response to Department of Toxic Substances Control letter dated December 7, 2011

C-1 As stated in Section VIII. Hazards and Hazardous Materials, Item c) of the IS/, databases researched with respect to potential human health or environmental hazards included the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, and the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). Based on a regulatory database search, the project site has not been subject to a release of hazardous substances.

The project site does include two facilities listed on the EPA's Resource Conservation and Recovery Information System (RCRIS) as a Hazardous Materials Handler. These facilities include Cruise Air Aviation and Ramona Aircraft Painting, Inc., both of which are located along Montecito Road within the bounds of the project site. However, as stated in the IS the project would not result in a significant hazard to the public or the environment because all storage, handling, transport, emission and disposal of hazardous substances would be in full compliance with local, State, and Federal regulations. California Government Code§ 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent

has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

A majority of the SE portion of the project site was identified in the IS as being located within the Ramona Bombing Target and Emergency Landing Field Formerly Used Defense Site (FUDS). A site inspection report, dated February 2010, prepared by Parsons Infrastructure and Technology Group, Inc., concluded that no unacceptable risks to human health are expected due to exposure to surface soils and sediments in the FUDS. No revisions to the CEQA documents were made as a result of this comment.

C-3 See response to comment C-2 above.

C-4 As stated in Section VIII. Hazards and Hazardous Materials, Item c) of the IS/MND, the project proposes to demolish or renovate two onsite residences that were constructed prior to 1980 that have been determined to contain both lead based paint (LBP) and asbestos containing materials (ACMs). Lead containing materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5, the worker health and safety requirements (Title 8 CCR Section 1532.1) and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Demolition or renovation operations that involve asbestos-containing materials would conform to San Diego Air Pollution Control District (SDAPCD) Rules 361.140- 361.156. In accordance with existing regulations, the project would be required to incorporate asbestos and lead abatement and control measures as part of demolition or renovation activities. No revisions to the CEQA documents were made as a result of this comment.

C-5 See response to comment C-2 above.

C-6 The County acknowledges the comment regarding human health and the protection of sensitive receptors. The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances. No revisions to the CEQA

documents were made as a result of this comment.

C-7 As stated in Section VIII. Hazards and Hazardous Materials, Item c) of the IS/MND, the project site was not historically subject to intensive agriculture and no hazardous sites were identified in the project area based on a review of hazardous materials databases; therefore, the potential for contamination resulting from pesticides or other agricultural chemicals in site soils or groundwater is less than significant. No revisions to the CEQA documents were made as a result of this comment.

C-8 See response to comment C-6 above.

C-9 See response to comment C-2 above.

Response to The Nature Conservancy letter dated January 6, 2012

D-1 Section 2.4.3 of the RMP has been revised to indicate that copies of the Federal and State grant and deed restrictions are on file with DPR. An Appendix has not been included due to its large size.

D-2 Section 2.4.3 of the RMP has been revised to indicate that copies of the TNC conservation easements and deed restrictions are on file with DPR. An Appendix has not been included due to its large size.

D-3 Figure 8b and Section 2.4.3 of the RMP have been revised to correct the small errors noted in the comment.

D-4 Comment noted. The County agrees to provide TNC with advance notice prior to engaging in activities or uses on the Preserve that DPR believes are permitted and that may disturb, alter, or impair the Conservation Values. No revisions to the CEQA documents are required as a result of this comment.

D-5 Comment noted.

D-6 Page 23 of the IS has been revised to state that "while maintained at a reduced density, native shrubby woody plants would be left in place and not replaced with species non-native to the Preserve."

D-7 The County agrees and acknowledges the requirement to comply with all zoning code and other setback requirements for proposed new construction adjacent to protected open space. No revisions to the CEQA documents are required as a result of this comment.

D-8 The County appreciates the comment and understands that biological and open space easements are in place on lands immediately adjacent to or

within vicinity of the Preserve. DPR has the authority to perform monitoring and adaptive management on these properties including the "environmental subdivision" parcels immediately northwest of the Preserve. Regarding APN 276-110-01 owned by the San Dieguito River Park Joint Powers Authority, DPR will coordinate with the JPA to perform monitoring on the property. The "open space" parcel APN 277-050-32 and the Wildlife Research Institute properties are privately owned and DPR does not have the authority to perform monitoring on these properties. A discussion was added to the Resource Management Plan under Section 2.4.3 Easements, Deed Restrictions, or Mitigation Properties, regarding properties adjacent and within the vicinity of the Preserve with biological and open space easements. In addition, Figure 8b has been revised to show existing open space easements and conserved lands within the vicinity of the Preserve.

D-9 The northeast portion of the Preserve contains an existing dirt road that runs in a north-south direction and provides both elevation gains and more distant and sweeping views toward the west, south, and east. This trail was included as part of the proposed trail network to provide a high-quality trail experience for a variety of users. While the trail would not connect to existing off-site trails, there is a potential for future connection to trails identified in the Community Trails Master Plan. The northern terminus of the proposed north-south trail in this portion of the Preserve would be gated and contain a 'no trespass' sign only, no parking or other facilities would be provided. Furthermore, as stated in the RMP (Implementation Measure C.2.2), the County will provide sufficient signage to clearly identify public access to the Preserve when open to the public and (Implementation Measure C.5.5.) will post clear signage reminding the public to remain on authorized trails. No revisions to the CEQA document are required as a result of this comment.

D-10 As a result of this comment, ICF conducted additional field surveys within the grasslands during June 2012 to further refine the vegetation map to include Saltgrass Grassland. A total of 15.63 acres of Saltgrass Grasslands was mapped within the Preserve. Saltgrass Grassland was not observed in areas that would be impacted as a result of the proposed new trails and associated infrastructure. The text and figures of the Baseline Biodiversity Report, Biological Resources Technical Report, Resource Management Plan, Vegetation Management Plan, and IS have been revised as necessary to reflect the updated vegetation map.

D-11 As a result of this comment, ICF conducted additional field surveys within the grasslands during June 2012 to further refine the vegetation map to include any additional areas of Valley Needlegrass Grassland. An additional 6.06 acres of Valley Needlegrass Grassland were mapped within the Preserve, bringing the total acreage within the Preserve to

14.22 acres. Additional areas of Valley Needlegrass Grassland were not observed in areas that would be impacted as a result of the proposed new trails and associated infrastructure. The text and figures of the Baseline Biodiversity Report, Biological Resources Technical Report, Resource Management Plan, Vegetation Management Plan, and IS have been revised as necessary to reflect the updated vegetation map.

D-12 As a result of this comment, ICF conducted additional field surveys during June 2012. Potential Engelmann oak hybrids were observed within the Preserve but outside of the project impact area. TNC's Easement Documentation Report for Oak Country II contains the following statements, "Two Engelmann oaks (*Q. engelmannii*) were found in the southern portion of the Property prior to the 2007 wildfire. One of these large Engelmann oaks died in response to fire damage and the second one was alive and healthy in 2011. There are many large oaks within the chaparral that may be pure Engelmann oaks, but are more likely hybrids (either *Q.* X *acutidens or Q. engelmannii* X *Q. berberidifolia*)". No revisions to the environmental documents are required as a result of this comment. In addition, the RMP includes implementation measure A.1.1 that requires on-going habitat monitoring, including the preparation of an updated vegetation community map every 5 years. If observed, additional Engelmann oak trees will be mapped during this process.

D-13 Figure 7 correctly depicts the locations where San Diego Horned Lizard was found (i.e., in the NW and SW portions of the Preserve). The text of the Biological Resources Report (Section 1.4.7.1) has been corrected to reference only the NW and SW portions of the Preserve.

D-14 Comment noted.

D-15 Page 6-3 of the RMP has been revised to delete the statement regarding all or portions of the Preserve burning every 5-17 years and instead references the approximately 4,800 acres burned since 1950, which represents an average of 80 acres (or 2% of the Preserve) each year.

D-16 The only reference to brush on page 6-4 of the VMP is the following, "Goats have been used to reduce fuel loading in small areas, usually in brush." The term brush is not specifically used to describe coastal sage scrub or chaparral. No change to the VMP is required as a result of this comment.

D-17 Page 7.13 of the VMP has been revised to state that it is not recommended that prescribed fire be conducted for at least 35 years as requested. The County acknowledges that any management tools, such as prescribed fire, that disturbs communities on lands encumbered by TNC conservation easements and deed restrictions would require formal

consultation with and prior written approval from TNC.

D-18 The sentence referenced in this comment, which occurs in Section 5.5.2 of the RMP, has been revised as follows" The long-term management of monitoring will be in accordance with DPW's Permits, Habitat Management Plan, and the Wetland Mitigation Plan, as well as the Federal and State grant and deed restrictions and the TNC conservation easement and deed restrictions."

Response to Wildlife Research Institute letter dated December 15, 2011

E-1 As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing construction of trails has been proposed. See responses to comments A1, A-3, A-4, A-5, A-37, A-42, A-49, and A-69 above.

E-2 Comment noted; however, the County disagrees with the statement that recreation is being placed ahead of all other concerns for wildlife preservation. No revisions to the CEQA documents are required as a result of this comment. See also responses to comments A-1, I-4 and I-5.

E-3 See responses to comment E-1, H-3, H4, and H11.

E-4 See response to comment E-2 above. In addition, as a result of the April 9, 2010 meeting with WRI, the proposed east-west trail option across the SE portion of the Preserve was removed from consideration and the southern trail loop of Old Survey Road 97 in the NW portion was removed from consideration. Please note that Chapter 5 of the RMP acknowledges the long-term management and monitoring of the Preserve will be in accordance with Federal and State grant and deed restrictions, and TNC conservation easements and deed restrictions that encumber portions of the Preserve. In addition, long-term management and monitoring of DPW's two mitigation parcels within the Preserve will follow DPW's Vernal Pool Habitat Management Plan and Wetland Mitigation Plan management and monitoring guidelines. TNC's deed restrictions allowed for public access within those portions of the Preserve acquired from TNC. Further, Proposition 50 funds were utilized to acquire the NW portion of the Preserve and the Subgrant Agreement (R81762-O) specifically states, "Grantee shall provide for public access to the Project in accordance with the intent of the Act" (refer to response to comment A-1 above).

E-5 Comment noted. This comment is not specific to the proposed project and the impact analysis contained in the IS/MND and BTR.

E-6 Comment noted. This comment is not specific to the proposed project and the impact analysis contained in the IS/MND and BTR.

E-7 Comment noted. This comment is not specific to the proposed project and the impact analysis contained in the IS/MND and BTR.

E-8 As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing construction of trails has been proposed. See responses to comments A-1, A-3, A-4, A-5, A-37, A-42, A-49, and A-69 above.

Response to Iipay Nation of Santa Ysabel (Clint Linton) email dated December 7, 2011

F-1 The County acknowledges and appreciates the comment. The project scope has been reduced substantially. In particular, the NW trail has been removed from the project and phasing of trail use/construction has been proposed. See responses to comments A1 and A3.

F-2 The County acknowledges and appreciates the comment, but through project design, development of project specific mitigation, and RMP implementation measures, the County has avoided impacts to identified cultural resources in the project area. See also response to comment F-1 above. In addition, please note that the Kumeyaay village of Pamo (spelled Pa'mu in the project documents) was addressed in the RMP and the cultural resource inventory for the Preserve, *Cultural Resources Survey and Inventory, Ramona Grasslands Preserve, San Diego County California* (ICF International 2010), where it was recommended that the area be identified as an archaeological district. Further, this resource, and particularly the human remains noted in the comment, are located in a portion of the Preserve not associated with the new proposed trail network and associated impacts; the area is included within the Preserve and so would be managed in accordance with the Preserve RMP and VMP. See also response to comment F-1 above. No revisions to the CEQA documents were made as a result of this comment.

F-3 The County acknowledges and appreciates the comment. A stakeholder meeting to discuss concerns and proposed trail alignment alternatives was held with tribal representatives in April 2010. An additional round of letters describing the current status of the project was recently sent to tribal representatives, utilizing a current NAHC contact list. No revisions to the CEQA documents were made as a result of this comment.

Response to San Diego Archaeological Society, Inc. letter dated January 2, 2012

G-1 The County acknowledges and appreciates the comment, but please note that Mitigation Measure MM-4 pertains to specific monitoring activities related to implementation of the public access plan, and calls for Native

American monitoring in specific circumstances. Mitigation Measure MM-5, by contrast, is a broader measure and applies to any activities within the Preserve that might lead to the inadvertent discovery of human remains, and provides County approved protocols for addressing such a situation. Importantly, Mitigation Measure MM-5 does not pertain exclusively to monitoring activities and so does not conflict with Mitigation Measure MM-4. No changes to the environmental documents were made as a result of this comment.

G-2 The County acknowledges and appreciates the comment. The cultural resources inventory report for the Preserve, *Cultural Resources Survey and Inventory, Ramona Grasslands Preserve, San Diego County California* (ICF International 2010) does address Country Survey Road 97, but it was inadvertently left out of the Cultural Resources Impact Assessment (ICF International 2011) in support of the current project. Section 1.2.2 Cultural Setting of the cultural resources inventory report, under the Historic Setting heading, has been revised to include a discussion of Old Survey Road 97 as requested.

G-3 The County acknowledges and appreciates the suggestion, and will consider historic landmark designation for the Village of Pa'mu as an action separate from the current project. No revisions to the CEQA documents were made as a result of this comment.

G-4 The County acknowledges and appreciates the comment, but please note that this recommendation is already addressed in the IS/MND and the cultural resources technical report. The provisions for management of CA-SDI-10270, including a site visit by an archaeologist prior to project implementation, and testing and evaluation of the resource if it cannot be avoided, are included in section 4.2.2 and Mitigation Measure 2 of the Cultural Resources Impact Assessment (ICF International 2011). In the IS/MND, the pertinent paragraph of Mitigation Measure 2 for cultural resources reads:

> For CA-SDI-10270, a resource located along the proposed east-west connector trail on non-Preserve land, the location of the site shall be confirmed in the field by a qualified archaeologist and the trail shall be rerouted if possible to avoid impacts. If avoidance is infeasible, the resource should be evaluated for significance by a qualified archaeologist, per County guidelines.

No revisions to the CEQA documents were made as a result of this comment.

G-5 The typographical error noted has been revised in Sections 5.0 and 8.0 of the Cultural Resources Impact Assessment (ICF International 2011) and

on page 11 of the MND.

Response to Endangered Habitats League letter dated January 16, 2012

H-1 As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing construction of trails has been proposed (See revised Figure 3 in the IS and responses to comments A-1 and A-3). The proposed project has been designed to be consistent with the existing South County MSCP and Draft North County Plan. In addition, see response to comments A-1, A-3, A-9, A-14a and A-14b for information regarding additional avoidance and minimization measures that have been added to the RMP to ensure the proposed project will also be in compliance with the Bald Eagle and Golden Eagle Protection Act (BEGEPA).

H-2 The County disagrees that a specific finding is needed within the RMP that details the grant agreement conservation obligations. However, Section 2.4.3 of the RMP has been revised to include a reference to the Federal and State grant and deed restrictions on file with DPR.

H-3 The County's Guidelines for Determining Significance state that the following condition would be considered a significant impact, "The project would impact golden eagle habitat. Any alteration of habitat within 4,000 feet of an active golden eagle nest 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 long-term survival of the identified pair of golden eagles." As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing construction of trails has been proposed (See revised Figure 3 in the IS and responses to comments A-1 and A-3). In addition, page 47 of the IS has been revised to state the following: "The known nesting site is located several miles from the nearest existing trail that is proposed to be part of the formal trail network within the Preserve; the closest proposed new trail is located over 4,000 feet from the known eagle nesting location (and is not within sight of the known nesting location)." Dedication of an official trail on existing dirt roads/trails does not constitute an alteration of habitat. While construction of a new trail would constitute an alteration of habitat, new trails are not proposed within 4,000 feet of the known golden eagle nesting site.

H-4 Section 3.3 of the Biological Resources Report has been revised to clarify that the cumulative projects would result in potential impacts to nesting/foraging birds/raptors. However, the conclusion in the document has not changed. While the project's impacts associated with the proposed trail network and associated facilities/improvement would contribute to cumulative impacts to special-status species and their

habitats, the overall project (which includes preservation and long-term maintenance and management of the Preserve for the benefit of special-status species) and associated impacts would not be cumulatively considerable. Additionally, a figure has been prepared showing cumulative loss of eagle habitat within the project vicinity; this figure is on file with DPR. Table 3-5 of the South County MSCP identifies anticipated conservation levels for covered species. The evaluation of species coverage for golden eagle states the species is covered because local populations are not critical to, and the MSCP Plan will not adversely affect the species long term survival. Development of the MSCP Plan has resulted in much less than 20% loss of habitat in San Pasqual nesting territory as evidenced by a cumulative analysis of projects within golden eagle nesting territory (on file with DPR). Thus, in accordance with coverage requirements, nesting territory should remain viable. Also, see responses to comments A-1, A-3, and A-5.

H-5 See response to comment A-13 above.

H-6 Implementation Measures A.4.17, A.4.18, and A.4.21 of the RMP discuss monitoring for golden eagles within the Preserve. The proposed monitoring will document raptor foraging, breeding and winter migration patterns to ensure that if needed, management actions can be implemented to minimize indirect impact to golden eagles at the Preserve. This information will be included in the MSCP required annual report.

H-7 In 2013 trail use monitoring will be implemented within the southwest portion of the Preserve (the existing Oak Country II Trail system). As detailed in responses to comments A-1 and A-3, the proposed construction/formal adoption of the trail network will be implemented in phases. This phased approach will allow for baseline raptor studies to be completed throughout the Preserve and specifically within the areas of the Preserve that are not currently open to the public (i.e., NW, NE and SE). Trail use monitoring data and the baseline foraging surveys will together inform the County on how to best implement adaptive management to avoid indirect impacts to foraging raptors. Correlations between foraging habits where there is currently public access and where there is none will be made prior to opening any future phases of trails at Ramona Grasslands. In addition, the preparation of a Golden Eagle/Raptor Foraging Study will be considered during the preparation of the County's Comprehensive Monitoring Program.

H-8 Figure 3 in the RMP details the locations of some of the proposed off-site trail connections, for example, the connection to proposed trails at Montecito Ranch in the NE quadrant. Other off-site trail connections are not shown in Figure 3 of the RMP or Figure 3 of the IS because they are not feasible at this time. Either there is private property that does not

currently allow public access such as a potential future connection to the Coast-to-Crest Trail via Old Survey Road 97 in the NW quadrant. Or, offsite discretionary projects, such as the trail connection to proposed trails at Cumming Ranch in the SE quadrant. Other Agencies specifically requested that these trails not be shown. Section 2.5 of the RMP has been revised to include the following information regarding potential connections with off-site trails:

"In addition, public access in the Preserve offers potential connections with the following off-site trails identified in the Ramona Community Trails and Pathways Plan:

- #8 – Santa Maria Creekside Trail
- #52 – Handlebar/Whirlwind Trail
- #53 – Montecito Pathway
- #57 – Kearny Historic Trail/Old Survey Road 97
- #93 – Montecito Trail System
- #104 – Tori Trail"

H-9 Comment noted. The RMP does not assume that existing trails are located in the least sensitive areas simply because they pre-exist. The BTR identifies existing trails within the Preserve as disturbed habitat and direct impacts associated with the adoption of these areas as designated trails would not be considered significant. Many of these existing areas are also used as ranch roads. If these areas were closed then additional impacts would occur not only to biological resources but also cultural resources as trails would need to be built to accommodate a vehicle. Analysis was done and that is why directional fencing at existing trail locations was proposed in some areas rather than realigning trails (for example at Oak Country). No changes were made to the CEQA documents as a result of this comment. See revised Figure 3 in the IS and responses to comments A-1 and A-3 regarding revisions to the project description and proposed phasing of trail construction.

H-10 Existing trails have been utilized as much as possible and they also act as ranch road access. They need to be maintained to allow for vehicle access. Where new trails are proposed, they are proposed to minimize impacts; for example in the NE quadrant, the proposed new trail is 4 ft wide. The existing stage route trail will be maintained at current width only up to one mile to allow for emergency and ranch access by vehicles. The remainder of this trail will then be maintained to 4 ft wide. In some instances, such as in the NE quadrant, the proposed new trail will be wider to allow for ranch road vehicle access. Chapter 1 of the BTR details the proposed trail widths which include widths from 4 feet to 10 feet. Construction of new trails within the Preserve would meet the guidelines in the Ramona Community Trails and Pathways Plan and Community Trails Master Plan (County 2005, updated in 2009) for Type C (Primitive) trails including 4-foot tread width consisting of natural surface material, with brush management requirements of 1 foot on either side. The new trail segment associated with the RMWD public access easement that connects the NE portion of the Preserve with Rangeland Road would follow the guidelines for Type C trails, except that it would be constructed the same width as the existing dirt road that it connects to (approximately 10 feet wide). Construction of new pathways along Rangeland Road and Highland Valley Road would meet the guidelines in the Community Trails Master Plan for Type D pathways including 10–12 feet tread width consisting of decomposed granite, with brush management requirements only at the edge of the pathways. Trails would be maintained at or near their original or intended standards, and maintenance would include various activities to keep trails in a safe, usable condition. Consistent with the Preserve RMP management directives, periodic assessments of trail conditions would be conducted to address surface material, drainage, vegetation clearing, signage, fencing, barriers, and any necessary repairs. No revisions to the CEQA documents were made as a result of this comment.

H-11 Figure 3 in the RMP shows existing fencing. Often it occurs along the proposed trails. Additional fencing will be considered during implementation of the RMP on an as needed basis. Topography and dense vegetation are expected to deter off trail use. In addition, Implementation Measure C.2.2 of the RMP addresses barriers to protect sensitive resources and deter off-trail use:

> **"Implementation Measure C.2.2:** DPR will provide sufficient signage to clearly identify public access to the Preserve when open to the public. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. The appropriate types of barriers to be used will be determined based on location, setting, and use. Monitor new developments adjacent to the Preserve to enforce non-authorized trail use."

H-12 See response to comment H-6 above.

H-13 Implementation Measure A.1.3 in the RMP states that DPR will conduct monitoring within the Preserve for invasive non-native plant species at 5-year intervals to assess invasion or re-invasion within the Preserve. In addition, the RMP allows for adaptive management of the Preserve and if determined to be necessary, monitoring will be conducted at more frequent intervals. It should be noted that even though formal monitoring is proposed at a 5-year interval, informal monitoring through communication with onsite rangers occurs regularly. Invasive plant removal is ongoing at the Preserve and has been for several years. Current efforts include eradication of thistle before it sets seed. No revisions to the CEQA documents were made as a result of this comment.

H-14 Section 5.2.2 outlines the MSCP covered species-specific monitoring and management to be conducted within the Preserve. Management Directive A.4 states that the County shall "provide for management and monitoring of North County Plan and MSCP Subarea Plan Covered Species and County Group A and B plant species (Priority 1)." In addition, the RMP includes species-specific monitoring for covered wildlife, including but not limited to the following, which are also identified as Priority 1:

> **"Implementation Measure A.4.12:** Every 3-5 years, DPR will qualitatively survey vernal pools within the Preserve including the two vernal pool mitigation areas associated with the Ramona Airport Improvement Project for the presence of San Diego fairy shrimp. The surveys will be conducted in years of adequate rainfall when vernal pools have filled.
>
> **Implementation Measure A.4.13:** Every 3-5 years, DPR will

qualitatively survey Santa Maria Creek (including the Ramona Airport Improvement Project wetland mitigation parcel) for the presence of arroyo toad and determine the proportion of steam segments occupied."

No revisions to the environmental documents are required as a result of this comment.

H-15 Chapter 4 of the VMP and Chapter 5 of the RMP detail the proposed monitoring restoration requirements. It should be noted that the VMP and RMP do not propose active restoration at the Preserve. If active restoration is proposed in the future a conceptual plan will be prepared that will detail performance or success standards for the restored habitats. Monitoring of active restoration associated with the DPW mitigation parcels is ongoing. No revisions to the RMP or VMP were made as a result of this comment.

H-16 Comment noted. As detailed in the RMP various biological resource monitoring intervals will be implemented at the Preserve. This includes annual surveys, surveys on intervals of 3 to 5 years and intervals of 5 years. Many sensitive and or target species and invasive plant monitoring does occur on a frequent (annual) basis. The 5 year monitoring interval is a standard placeholder and will be revised and implemented accordingly as more information on appropriate monitoring intervals becomes available through the SDMMP. No revisions to the RMP were made as a result of this comment.

H-17 See response to comment H-14 above, and specifically Implementation Measure A.4.13 of the RMP.

H-18 Quarterly bird surveys are not feasible. However, surveys will occur on a 5 year basis (subject to change based on information to be provided by the SDMMP). In addition, baseline raptor surveys will occur at the Preserve in accordance with the avoidance and minimization measures outlined in the response to comments A-1, A-3, A-9, A-14a and A-14b.

H-19 Focused surveys for SKR will occur adjacent to the Montecito Ranch area prior to any land disturbance for the proposed staging area. See response to comments A-16 and A-59 above. Additional monitoring may be proposed depending on the outcome of those future surveys.

H-20 Although the VMP and RMP do not propose active restoration at the Preserve, active restoration is an adaptive management tool that could be implemented following changes in vegetation composition, if needed. Active restoration would not be implemented when natural recruitment or passive restoration of naturally degraded habitats is occurring. No

revisions to the RMP or VMP were made as a result of this comment.

H-21 See response to comment A-73 above.

H-22 The County would maintain habitat within 100 ft of structures in accordance with fuel management zone criteria based on written direction from the fire department. However, there are no structures within 100 ft of the preserve and no fuel management is occurring or is expected to occur at the Preserve as a result of offsite structures. The only fuel management activity is grazing. No revisions to the CEQA documents were made as a result of this comment.

Response to Robert Farnsworth letter dated January 8, 2012

I-1 The public review period for the Ramona Grasslands Preserve Project Draft Initial Study/Mitigated Negative Declaration was extended through January 17, 2012. All comments received by that date are included herein. The statement is noted.

I-2 CEQA Section 15072 requires a lead agency to provide a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration to the public, responsible agencies, trustee agencies, and the county clerk. The NOI must be mailed to organizations and individuals who have previously requested such notice in writing and the NOI must also be provided to the public by at least one of the following: publication in a newspaper with circulation in the area affected by the project, posting of the NOI on and off-site where the project is located, and /or direct mailing to owners and occupants of properties contiguous with the proposed project. In compliance with CEQA, the NOI was provided to responsible and trustee agencies and the county clerk and was distributed via mail to organizations/individuals who had requested such notice in writing and owners/occupants of contiguous properties, hand-delivered to the Ramona Library, posted on the County's website, made available for review at the County's offices, and posted in the North County Times.

I-3 As stated in Section XVI. Transportation/Traffic of the IS, the proposed project was conservatively assumed, based on the Traffic Impact Analysis (LL&G 2004) prepared for the previously proposed residential development on the southwest portion of the project site (i.e., Oak Country Estates), to generate 156 ADT which would not have a significant direct impact on existing traffic volume.

A staging area was constructed as part of the Oak Country II Trails Project in the southwest portion of the Preserve and is accessed off Highland Valley Road. The second proposed staging area is located in the NE portion of the Preserve and would be accessed via an unpaved unnamed

road extending west from Montecito Way. Staging areas/vehicle parking spaces are not proposed along Rangeland Road and access to staging areas are not proposed off Rangeland Road; as such, the project would not result in significant amounts of increased traffic on Rangeland Road.

The County acknowledges the presence of private property in the vicinity of the proposed project, including at the northern terminus of Rangeland Road. The proposed project does not involve access on private property outside of County-owned easements. No revisions to the CEQA documents were made as a result of this comment.

I-4 As depicted in Figure 3. Trails, Fencing, and Gates of the Resource Management Plan, the Preserve is currently fenced, including along both the east and west sides of Rangeland Road and along the perimeter of the NE parcel. In addition, the RMP involves the implementation of management directives including C.4 and C.6, which focus on the installation and maintenance of fencing, gates, and signage within the Preserve. Furthermore, as stated in Section 1.2.2 of the RMP, the Preserve is located in the management district of one supervising park ranger, three park rangers, three seasonal, and two volunteers. Perimeter patrolling of the Preserve occurs on a daily basis and interior patrolling occurs once a week. No revisions to the CEQA documents were made as a result of this comment.

I-5 As noted in Section 2.4.3 of the Resource Management Plan, the acquisition of a majority of the Preserve was facilitated by The Nature Conservancy (TNC), and the County acquired the properties within the Preserve from TNC. The acquisition of the properties came with associated conservation easements and deed restrictions from TNC. In addition, the grant funds used by TNC to purchase the properties required not only management for the benefit of wildlife, but in specific portions of the Preserve (including the NW portion) also required public access be provided. See revised Figure 3 in the IS and responses to comments A-1 and A-3 regarding revisions to the project description and proposed phasing of trail construction.

I-6 See response to comment I-4 above.

I-7 See responses to comments I-2, I-3 and I-4 above.

I-8 In accordance with CEQA, the County is providing these written responses to comments and will comply with all other requirements to inform the public of the process. No revisions to the CEQA documents are required as a result of this comment.

I-9 The statement is noted.

Response to Robin Campbell email dated November 30, 2011

J-1 The County acknowledges and appreciates your support of the existing Oak Country II trails.

J-2 The proposed project includes an additional staging area in the NE portion including 30 visitor parking spaces with additional overflow car parking and 18 horse trailer parking areas, hitching rails, an informational kiosk, trash receptacles, bathrooms, and picnic tables or benches.

J-3 The County acknowledges and appreciates your support of the proposed project.

Response to Christine Griffin email dated December 1, 2011

K-1 The County acknowledges and appreciates your support of the proposed project.

Response to Ernie Smith email dated December 2, 2011

L-1 The County acknowledges and appreciates your support of the proposed project. As stated in the Initial Study, the project includes restoration of the existing rodeo corral to a horse riding arena, located south of the proposed staging area in the NE portion. DPR would enter into a Memorandum of Agreement (MOA)/Memorandum of Understanding (MOU), with the Ramona Trails Association (RTA) where the County owns the property and maintains the connecting trails, and the RTA operates and maintains the horse riding arena. The refurbished arena would measure 130 by 317 feet and operate during Preserve hours.

Response to Gina Frek email dated December 1, 2011

M-1 The County acknowledges and appreciates your support of the proposed project. Please refer to response to comment L-1 above.

Response to Gina Montegna email dated December 4, 2011

N-1 The County acknowledges and appreciates your support of the proposed project.

Response to Karen Carlson email dated November 30, 2011

O-1 The County acknowledges and appreciates your support of the proposed project.

Response to Elizabeth Edwards email dated November 30, 2011

P-1 The County of San Diego acknowledges and appreciates the comment; however, the issue raised in this comment is not related to the proposed project.

P-2 The County of San Diego acknowledges and appreciates the comment; however, the issue raised is not related to the significant environmental effects of the proposed project.

P-3 The County of San Diego acknowledges the comment.

Response to Alison Farrin email dated December 15, 2011

Q-1 The County acknowledges and appreciates your support of the proposed project.

Response to Lisa Whitebread email dated December 1, 2011

R-1 The County acknowledges and appreciates your support of the proposed project and postings regarding work parties within the Preserve will be posted on the DPR website, www.sdparks.org.

Response to Karina Benish email dated December 2, 2011

S-1 The County acknowledges and appreciates your support of the proposed project.

Response to Elfta Hilzman email dated December 1, 2011

T-1 The County acknowledges and appreciates your support of the proposed project. Please refer to response to comment L-1 above.

Response to Deborah Schott email dated January 13, 2012

U-1 Comment noted. The County acknowledges and appreciates your support of public access within the Preserve.

Response to Kathleen Fitz email dated January 13, 2012

V-1 The proposed project does not involve closing the Ramona Grasslands

Preserve to the public but rather proposes additional trails, beyond the previously approved and constructed Oak Country II trails in the southwest portion of the Preserve, and the implementation of a Resource Management Plan and Vegetation Management Plan for the entire Preserve. The County acknowledges and appreciates your support of public access within the Preserve.

Response to Karen Carlson email dated January 13, 2012

W-1 Comment noted. The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Carl Gardner email dated January 13, 2012

X-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Lori Watson email dated January 13, 2012

Y-1 The County acknowledges and appreciates your support of the proposed project.

Response to Michelle Scott email dated January 13, 2012

Z-1 Please see response to comment V-1 above.

Response to Loretta Nielsen email dated January 13, 2012

AA-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Roxanne Davis email dated January 13, 2012

BB-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Joan Powell email dated January 13, 2012

CC-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Julie Bernas email dated January 13, 2012

DD-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Jill Bacorn email dated January 13, 2012

EE-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Wes and Karla Brustad email dated January 13, 2012

FF-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve.

Response to Dennis and Ellen Sargent email dated January 13, 2012

GG-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve.

Response to Terry F. Carlson email dated January 13, 2012

HH-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve.

Response to Meg Hylton email dated January 13, 2012

II-1 Comment noted. The County acknowledges and appreciates your support of the proposed project including public access within the Preserve.

Response to Roberta Carr email dated January 13, 2012

JJ-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1.

Response to Robin Joy Maxson email dated January 13, 2012

KK-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Erna P. Adelson email dated January 14, 2012

LL-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Dawn Rockwell email dated January 14, 2012

MM-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to David Ross email dated January 13, 2012

NN-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Jeff and Terry Dorsett email dated January 14, 2012

OO-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve.

Response to Jim and Sharon Oster email dated January 14, 2012

PP-1 Comment noted. The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Terri Halverson email dated January 14, 2012

QQ-1 Comment noted. The County acknowledges and appreciates your support of public access within the Preserve.

QQ-2 As stated in Section 1.2.3 of the RMP, "The County's park rangers manage County parks and enforce preserve rules and regulations pursuant to San Diego County Code of Regulatory Ordinances Title 4, Division 1, Chapter 1 County Parks and Recreation. In addition, per County Code of Regulatory Ordinance Sections 41.111, 41.112, and 41.113, all wildlife, plant, historical artifacts, and geologic features are protected and are not to be damaged or removed. Any person who violates any provision of these sections is guilty of a misdemeanor as provided in Sections 11.116, 11.117, and 11.118 of this Code, punishable by fines up to $2,500 a day for each day the person violates these sections. The park rangers will contact law enforcement who will cite the offending individual. In addition, if an individual does not comply with signs within a facility and ignores park ranger instructions, the individual could potentially be charged with a misdemeanor by law enforcement. No revisions to the CEQA documents were made as a result of this comment.

Response to Jo Ann Sudul email dated January 14, 2012

RR-1 See response to comment V-1 above.

Response to George Eastwood email dated January 14, 2012

SS-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Jolinda Marshall email dated January 14, 2012

TT-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve.

Response to Rob Wallace email dated January 14, 2012

UU-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Jacque Powell email dated January 14, 2012

VV-1 Comment noted.

Response to Melanie S. email dated January 14, 2012

WW-1 The County acknowledges and appreciates your support of the proposed project. In addition, refer to response to comment V-1 above.

Response to Lisa Whitebread email dated January 13, 2012

XX-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Stacy Adelman email dated January 13, 2012

YY-1 Comment noted. In addition, refer to response to comment V-1 above.

Response to Susan DePriest email dated January 13, 2012

ZZ-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Jacque Sherman email dated January 13, 2012

a-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Becky Cullen email dated January 13, 2012

b-1 The County acknowledges and appreciates your support of public access within the Preserve.

Response to Christine Griffin email dated January 13, 2012

c-1 See response to comment V-1 above.

Response to Patricia Swart email dated January 13, 2012

d-1 Please refer to response to comment V-1 above.

Response to Camryn Burton email dated January 13, 2012

e-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Julie Harski email dated January 13, 2012

f-1 The County acknowledges and appreciates your support of non-motorized public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Bob Chishom email dated January 13, 2012

g-1 The County acknowledges and appreciates your support of public access within the Preserve.

g-2 Comment noted.

g-3 The proposed trails traverse habitats suitable to support nesting birds. The IS/MND and Biological Resources Technical Report acknowledge the potential for impacts to nesting birds and provides the measures to ensure impacts are avoided and compliance with the Migratory Bird Treaty Act. No revisions to the CEQA documents were made as a result of this comment.

g-4 Comment noted.

Response to George DeBoelpaep email dated January 13, 2012

h-1 Comment noted.

Response to Maria Biondo Longton email dated January 13, 2012

i-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Linda K. Richter email dated January 13, 2012

j-1 The County acknowledges and appreciates your support of public access within the Preserve. See also response to comments V-1 and g-1 above.

Response to Rosalie Crawford email dated January 13, 2012

k-1 The County acknowledges and appreciates your support of public access within the Preserve. In addition, refer to response to comment V-1 above.

Response to Mary Doalle form letter dated January 14, 2012

l-1 As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing the construction of trails has been proposed (See revised Figure 3 of the IS and responses to comments A-1 and A-3). Page 47 of the IS has been revised to state the following "The known nesting site is located several miles from the nearest existing trail that is proposed to be part of the formal trail network within the Preserve; the closest proposed new trail is located over 4,000 feet from the known eagle nesting location (and is not within sight of the known nesting location)." Please also see responses to comments A-9 and H-3 above.

l-2 Please refer to response to comment 5 of letter I (Robert Farnsworth letter dated January 8, 2012).

l-3 Comment noted, in addition, Section 1.9.2 of the County of San Diego MSCP Subarea Plan states, "Public access and passive recreation are permitted uses within specified areas of the preserve."

l-4 As a result of comments received during public review and subsequent meetings with the Wildlife Agencies, the project description was revised and phasing construction of trails has been proposed (See revised Figure 3 in the IS and responses to comments A1 and A-3). The proposed trail and pathway alignments have been designed to utilize existing dirt ranch roads to the maximum extent feasible to minimize ground disturbance. In addition, construction of new trails and staging areas and the proposed bridge crossing at Santa Maria Creek occur along the boundaries of the Preserve; an alternative creek crossing has also been analyzed off-site which would further minimize potential impacts if coordination with the RMWD is successful and if the proposed Santa Maria Wastewater Treatment Plant expansion project is constructed. The preferred trail and pathway alignments were developed after a series of stakeholder meetings and represent a compromise that the County believes provides both protection and management of sensitive resources and a safe recreational experience.

l-5 The County of San Diego has several departments that work together in the approval and implementation of County projects, including but not limited to Parks and Recreation, Planning and Land Use, and Multiple Species Conservation Program departments. As noted in the IS, the

project is intended to provide not only recreational use but resource management to enhance the existing Ramona Grasslands Preserve. The proposed project includes the implementation of a Resource Management Plan which includes management directives and implementation measures to meet the MSCP goals and objectives under all of the following elements: Biological Resources; Vegetation Management; Public Use, Trails, and Recreation; Operations and Facility Maintenance; and Cultural Resources. No revisions to the CEQA documents were made as a result of this comment.

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In Reply Refer To:
FWS/CDFG-SDG-10B0659-12TA0102

JAN 0 6 2012

Mr. Brian Albright
Director, Parks and Recreation
County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, California 92123

Subject: Draft Mitigated Negative Declaration (MND) for the Ramona Grasslands Preserve Project, including the Public Access Plan, Resource Management Plan, and Vegetation Management Plan, San Diego County, California

Dear Mr. Albright:

This letter provides comments from the California Department of Fish and Game (Department) and the United States Fish and Wildlife Service (Service), collectively referred to herein as the Wildlife Agencies, on the County of San Diego's (County) May 2011 Ramona Grasslands Preserve (Preserve) project, including the Public Access Plan (PAP), Resource Management Plan (RMP), and Vegetation Management Plan (VMP). The project is located at the Ramona Grasslands, which consists of 3,490 acres located southwest of the unincorporated township of Ramona, west of State Route (SR) 67, north of Highland Valley Road, and east and west of Rangeland Road.

The majority of the Preserve is located in the North County Multiple Species Conservation Program (NCMSCP) planning area. According to the draft NCMSCP, the Ramona Grasslands subunit is identified as a core habitat area and a linkage area that connects to San Pasqual Valley and the San Dieguito River Valley to the north and to the southeast to habitat east of SR-67 and to San Vicente Highlands Open Space Preserve. Approximately 422 acres of the Preserve (northern area) is located within the Metro-Lakeside-Jamul segment of the County's existing Multiple Species Conservation Program Subarea Plan (MSCP SAP).

The Preserve was established in 2009 as the result of a cooperative effort (primarily through the Federal Endangered Species Act Section 6 Program) between the County, the State of California, the Service, The Nature Conservancy, and the local land owners. The primary purpose for establishing the Preserve, as articulated in the funding and acquisition documents, was conservation of biological resources, including native and sensitive habitats, State and federally listed species, and other species considered sensitive at the Federal, State, and local level.

The Ramona Grasslands Preserve Project consists of the following four main components: 1) establishment of a multi-use trail system within the Preserve based on the County's PAP, including a crossing of Santa Maria Creek; 2) construction of supporting infrastructure improvements such as a staging area, ranger station/interpretive center/restroom facility, a maintenance building, a primitive amphitheater, picnic areas, a viewing pavilion/visitor kiosk, a horse arena, and volunteer pads in the northeast portion of the Preserve; 3) implementation of the management directives identified in the RMP; and 4) implementation of the VMP, including a grazing management plan. The PAP for the Preserve proposes establishing an 8.6 mile non-motorized multi-use trail network (e.g., hiking, bicycle, equestrian). The PAP includes 6.5 miles of existing trails, 2.1 miles of new trails within the Preserve, and 2.0 miles of pathways that are proposed along Highland Valley and Rangeland roads.

The draft MND and supporting biological technical report (ICF 2011) concludes that a total of 6.628 acres of direct impacts to sensitive vegetation communities will occur as a result of the PAP, as follows: non-native grassland (NNG, 6.27 acre), open coast live oak woodland (0.08 acre), disturbed wetland (0.006 acre), non-vegetated channel (0.002 acre), southern mixed chaparral (0.11 acre), coastal sage-chaparral scrub (CSS, 0.03 acre), and disturbed coastal sage scrub (CSS, 0.13 acre). If the alternative crossing of Santa Maria Creek on Ramona Municipal Water District (RMWD) property is used, impacts to native or naturalized vegetation communities would be reduced by 0.86 acres. Significant impacts to sensitive vegetation communities are proposed to be offset through offsite preservation of habitat, the purchase of mitigation credits within an approved mitigation bank, or in accordance with County Board Policy I-138 at established mitigation ratios (e.g., in accordance with ratios outlined in the County's adopted MSCP SAP or, when adopted, the NCMSCP).

The Wildlife Agencies have previously met with County staff to discuss the proposed trails within the Preserve. Most recently, we met on August 30, 2011, during which time we reiterated our concerns with the establishment of new trails and trail usage and potential impacts to sensitive species, including the golden eagle (*Aquila chrysaetos*), at the Ramona Grassland Preserve. We also provided comments on various other RMPs in the County identifying what we believe are critical elements required for all RMPs to meet MSCP permit requirements as set forth in the County's MSCP SAP Implementing Agreement and Framework Management Plan (FMP). Our comments herein build upon these past meetings and comments and are provided to ensure that the proposed project and the County's revised RMP and Area Specific Management Directives (ASMDs) for the Ramona Grasslands are consistent with MSCP requirements and to eliminate the potential for future conflicts between the RMP directives and the adopted MSCP SAP, as well as other regulations for species protection (e.g., Fish and Game Code Sections 3500, 1600, and 2800, *et. seq.*).

Our comments and recommendations are based on the information provided in: 1) the draft MND and associated documents [i.e., biological technical report for the Ramona Grasslands Preserve (ICF 2011)]; 2) meetings with your staff on July 15, 2010, August 12, 2010 (site visit), and August 30, 2011; 3) the funding agreements that provided for the acquisition and

conservation of the Preserve; 4) recent revisions to implementing regulations for the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d); and 5) our knowledge of listed and sensitive species within the Preserve.

The following are the Wildlife Agencies' major concerns with the MND and RMP (including the PAP and VMP) for the Ramona Grasslands as proposed by the County. Where reference to the adopted MSCP SAP and future NCMSCP are provided, our comments refer to those areas of the Preserve located in each of those respective NCCP/HCPs.

Compatibility of Recreational Uses within the Preserve

We acknowledge that public access (e.g. trails) and passive recreation can be compatible uses within preserve areas provided that they are sited in the least environmentally sensitive areas and do not diminish the intended conservation values. As stated above, the primary purpose for establishing the Ramona Grasslands Preserve was the conservation of biological resources including native and sensitive habitats, State and federally listed species, and other species considered sensitive at the Federal, State, and local level. Because the primary purpose and justification for acquisition of the Preserve properties was the conservation of biological resources [especially raptors (e.g., "golden eagles")], any proposed activities, including, but not limited to, the PAP should not interfere with the purpose for which the land was acquired. A-1

In addition to meeting the criteria established through the Section 6 Program, the proposed project must be consistent with the Bald and Golden Eagle Protection Act. On November 10, 2009, new regulations (74 FR 46835-46879) ("Eagle Act Regulations") under the Bald and Golden Eagle Protection Act went into effect allowing the Service to issue two new types of permits to improve the management of bald eagles (*Haliaeetus leucocephalus*) and golden eagles. The two permits are designed to protect public safety and manage activities or projects that may "disturb"[a] or otherwise incidentally "take" bald or golden eagles or their nests. Prior to these new regulations, there were no provisions for issuing permits under the Bald and Golden Eagle Protection Act for activities that could disturb or otherwise incidentally take these two species of eagles.[b] A-2

[a] The Bald and Golden Eagle Act defines the "take" of an eagle to include a broad range of actions including: pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb.

[b] Prior to 2007, an Endangered Species Act permit was available to take bald eagles incidental to an otherwise lawful activity; however, when the bald eagle was delisted in 2007, there were no provisions for issuing permits under the Bald and Golden Eagle Protection Act for activities that could disturb or otherwise incidentally take either species of eagle. Because the growing population of bald eagles, in particular, could significantly curtail legal human activities if such permits were not available, new permit regulations were established under the Bald and Golden Eagle Protection Act to address this specific concern to bald eagles and to include permits to incidentally take golden eagles.

The definition of disturb includes interfering with normal breeding, feeding, or sheltering behavior to the degree that it causes or is likely to cause decreased productivity or nest abandonment, as defined in 50 CFR 22.3 (72 FR 31132). The Eagle Act Regulations allow for the authorization of limited take of bald and golden eagles when the take is associated with, but not the purpose of, an otherwise lawful activity that cannot practicably be avoided. The Service prioritizes the issuance of golden eagle take for projects in the following order: 1) safety; 2) native American religious use (take under already existing regulation); 3) renewal of programmatic permits; 4) non-emergency activity to ensure public health and safety; 5) resource development or recovery operations (for golden eagle nests only; under already existing regulation); and 6) other. In addition, permits will only be granted for activities that are compatible with the goal of maintaining stable or increasing breeding populations. A-2 cont.

As previously stated in our letter dated August 19, 2010, and in our meetings with your staff, we are concerned that the proposed trail alignments and the associated use of the trails would diminish the capacity of the Preserve to support biological resources identified in the subgrant agreement, including the golden eagle. In addition, we stated that the use and maintenance of the PAP is likely to disturb (i.e., take) golden eagles. Of particular concern is the potential for human activities to disturb nesting golden eagles from the northwestern trail segment that closely approaches a nest site and for recreational activities to disrupt or interfere with golden eagle foraging throughout the Preserve. The Wildlife Agencies continue to strongly recommend that the northwestern trail segment be removed from the PAP. A-3

In addition to the golden eagle pair nesting near the proposed trail and whose territory encompasses the Preserve, two additional golden eagle pairs are known to nest within several miles of the Preserve. These nesting golden eagles are also expected to forage within the Preserve during the non-breeding season and/or during periods of low prey availability (e.g., drought). As discussed at our meeting on August 30, 2011, the Service recommends that the County prepare and submit an Eagle Conservation Plan to address the golden eagle and the proposed activities within the Preserve. The Service is available to assist the County in development of such a plan and recommends using the guidance we provided at the August meeting. The goal of the Eagle Conservation Plan should be to identify sufficient measures and actions that the County will implement such that no disturbance as defined by the Eagle Act Regulations is likely to occur; thus, a Bald and Golden Eagle Protection Act permit would not be necessary. A-4a

However, if the County continues to pursue the proposed PAP, or any other trail system within the Preserve not considered by the Wildlife Agencies to avoid disturbance (i.e., take) of golden eagles, we recommend the County apply for a "programmatic take permit" pursuant to the Bald and Golden Eagle Protection Act to address potential disturbance to golden eagles from the proposed trails/recreational activities on the Preserve. A-4b

Lastly, we are concerned that implementation of the proposed PAP will negatively affect the ability of the County to achieve its MSCP SAP conservation requirements for the golden eagle. As you are aware, the Service issued a section 10(a)(1)(B) permit pursuant to the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*) for the County's A-5

MSCP SAP on March 17, 1998. The Department also issued Natural Community Conservation Plan (NCCP) Approval and Take Authorization per Section 2800 *et seq.*, of the California Fish and Game Code. The MSCP SAP identifies anticipated conservation levels for covered species that includes maintaining the viability of golden eagle nesting territories within the San Pasqual Valley. Specifically, Table 3-5 of the MSCP Plan clearly identified seven golden eagle nesting territories that would remain viable within the MSCP SAP, one of which is the territory that includes the nest site located just off site from the northwestern portion of the Preserve. The revised MND needs to adequately assess the potential impacts of the PAP to the County's MSCP SAP. We are concerned that without further modifications to the current PAP to protect golden eagle territories, the County will be unable to comply with the MSCP SAP. A-5 cont.

Federally and State listed species

Federally and/or State-listed species known to occur within the Preserve include San Diego fairy shrimp (*Branchinecta sandiegonensis*, "fairy shrimp"), arroyo toad [*Anaxyrus* (=*Bufo*) *californicus*], coastal California gnatcatcher (*Polioptila californica californica*, "gnatcatcher"), Stephens' kangaroo rat (*Dipodomys stephensi*, "SKR"), and spreading navarretia (*Navarretia fossalis*). In addition, the Preserve contains critical habitat designated by the Service for fairy shrimp, arroyo toad, gnatcatcher, and spreading navarretia. A-6a

The draft MND and supporting biological technical report identify a potential for "take" of both federally and State-listed species, including the arroyo toad and Stephens' kangaroo rat, as well as impacts to designated critical habitat for multiple species, as a result of trail maintenance and implementation of the RMP and VMP. A-6b The revised MND and associated biotechnical report should include the following: a discussion and quantification of potential impacts (both direct and indirect) to designated arroyo toad, gnatcatcher, fairy shrimp, and spreading navarretia critical habitat within the project area that may occur as a result of the PAP, RMP and VMP; A-6c a thorough discussion of the potential direct and indirect impacts to, and potential "take" of, arroyo toad and SKR that could occur as a result of trail maintenance and implementation of the PAP, RMP, and VMP; A-6d and a list of arroyo toad and SKR avoidance and minimization measures that will be implemented during PAP construction and maintenance activities and implementation of the RMP and VMP. A-6e

The majority of the project is located within the NCMSCP boundary, which is still in draft form; therefore, "take" of listed species within these portions of the project has not yet been authorized by the Service (pursuant to FESA) or the Department (pursuant to CESA or NCCP Act). A-7a If "take" of federally listed threatened or endangered species will result from portions of the project that do not involve a federal nexus (e.g., trail maintenance and implementation of the RMP and VMP), A-7b then "take" authorization should be obtained through the development of a Habitat Conservation Plan (HCP) pursuant to section 10 of the FESA prior to implementation of those activities that will result in take. Trail maintenance and implementation of the RMP and VMP should not begin until all appropriate "take" authorizations have been obtained. A-7c In addition, we recommend that trail segments remain closed to public access until such time as the "take"

authorizations have been obtained and trail/Preserve maintenance and management is being fully implemented. A-7c cont.

We offer the following additional recommendations and comments to assist the County in minimizing and mitigating project impacts to biological resources, and to assure that the project is consistent with ongoing regional habitat conservation planning efforts:

Species Comments

Golden Eagle

1. We acknowledge and appreciate changes made to the proposed trail system by your Department [County of San Diego Department of Parks and Recreation (SDDPR)] to address some of the concerns expressed at our July 15, 2010, meeting and August 12, 2010, site visit regarding potential direct and indirect effects of the use and maintenance of the trails on golden eagles within the Preserve. Specifically, removing four of the proposed trail segments from the trail system to reduce the potential impacts to vernal pool habitats, closing and passively restoring portions of Old Survey Road 97, decreasing the proposed amount of public access to some areas that support sensitive species, and reducing the overall amount of habitat that would be lost due to construction of new trails. However, potential impacts to biological resources from the remainder of the proposed trail system are still evident. A-8

   Our staff, as well as staff from the Service's Division of Migratory Bird Management reviewed the proposed trail plan and associated documents and determined that the use and maintenance of the proposed trail plan is likely to disturb (i.e., take) golden eagles due to 1) the proximity of the trails to the golden eagle nest site [i.e., as stated in the environmental document and biological technical report (ICF, 2011), "[t]he known nesting site is located ½ mile (2,640 feet) from the nearest existing trail that is proposed to be part of the formal trail network within the Preserve] and 2) the dependency of up to three pairs of golden eagles on the Preserve for foraging and the potential for the proposed trail plan to result in direct and indirect impacts to foraging habitat in various locations through the Preserve. A-9

   Based on our determination, the Wildlife Agencies provided recommendations to SDDPR during our July 15, 2010, meeting; August 12, 2010, site visit; and August 30, 2011, meeting. Our recommendations were, and continue to be, as follows: 1) complete removal of the northwestern trail (i.e., Old Survey Road 97); and 2) if the northwestern trail is not completely removed, the trail should only be used for limited docent-led tours late in the year, prior to on-set of breeding activities (i.e., October). The goal of these recommendations is to identify, in part, a level and location of public access on the Preserve that can occur while avoiding "disturbance" of golden eagles. A-10

2. As stated previously, in addition to the golden eagle pair nesting near the proposed trail and whose territory encompasses the Preserve, two additional golden eagle pairs are known to A-11

nest within several miles of the Preserve. These nesting golden eagles are also expected to forage within the Preserve during the non-breeding season and/or during periods of low prey availability (e.g., drought). The MND, biotechnical report, RMP and VMP should be revised to address the two additional golden eagle pairs. A-11 cont.

3. The draft MND states that, "the project is not anticipated to result in impacts to the nesting success of the golden eagle in the Preserve." We disagree with this conclusion based on our comment #1 above. In addition, the draft MND and associated biotechnical report do not include a discussion of potential indirect impacts from the project on golden eagle foraging or courtship behaviors that may result from increased human activities occurring throughout the preserve. The revised MND and biotechnical report should include a thorough discussion of these potential indirect impacts to golden eagles using the Preserve. A-12

4. The biotechnical report (Page 3-6, Section 3.2.5) states that, "as funding is available, implementation measures will be used that will provide additional protections for the golden eagle." We are concerned that there is not an identified funding source to ensure implementation of golden eagle minimization measures. The revised RMP should clearly show that an adequate funding source is available for immediate implementation of all minimization measures. A-13

5. One of the golden eagle minimization measures discussed in the RMP is the seasonal closure of trail sections where foraging eagles have been frequently observed. Without detailed baseline information regarding golden eagle foraging locations and frequency within areas of the preserve prior to implementation of the PAP, and given the potential for recreational activities to disrupt or interfere with golden eagle foraging throughout the Preserve, we are concerned about the effectiveness of this minimization measure as currently proposed. We recommend that studies be conducted within the Preserve prior to implementation of the PAP to determine the baseline foraging habits of the golden eagles using the Preserve. In addition, we recommend the development of a detailed golden eagle monitoring plan that would include, but not be limited to, annual surveys of known offsite nest locations to determine occupancy during the breeding period (December through June); monitoring of the numbers and types of trail users; identify peak trail usage times; and identifying areas with high frequency of golden eagle foraging and/or areas where eagle foraging frequency has changed in comparison to the "pre-PAP" baseline studies. This information could then be used to identify locations where seasonal trail closures are required to minimize disturbance to the golden eagles. We recognize that gathering this information can be costly and are willing to work with the County to identify potential funding sources. A-14a A-14b

6. Appendix G (Conservation Analysis) of the RMP provides the following recommendations to minimize potential indirect impacts to golden eagles associated with the proposed PAP: installation of signage, planting of cactus thickets along the trail edge, phasing the opening of portions of the trail to ensure vegetation has recovered from fire effects to its former density, A-15

and seasonal trail closures. These measures should also be incorporated into the revised MND and main body of the RMP. A-15 cont.

Stephens' kangaroo rat

7. We have concerns regarding the proposed staging area in the northeastern portion of the Preserve and its potential to impact the federally and State-listed SKR, and whether this staging area is necessary considering the proposed staging area associated with the adjacent Montecito Ranch property. We recommend that updated SKR surveys be conducted for this area and the results included in a revised MND and RMP. Mitigation measures for SKR for this area (e.g., surveys, exclusion fencing and rendering the site unsuitable for SKR immediately after habitat is disturbed/cleared) should be included in the revised MND. Per our meeting on August 30, 2011, the revised MND and RMP should indicate that the size of the proposed staging area (currently 30 car spaces and 18 horse trailer spaces) will be reduced if the Montecito Ranch facility is built as indicated by the County at the meeting. Conversely, if the staging area is built at 30 car spaces before the Montecito Ranch facility is approved, that facility will be reduced accordingly. A-16a A-16b A-16c A-17

8. SKR are known to occupy areas around the Oak Country II Estates staging facility, which connects to the proposed PAP. There is also a 3-acre SKR relocation area that was required as part of the biological opinion (BO) and California Endangered Species Act (CESA) 2080.1 consistency determination for the Oak Country II trails staging facility. The 3-acre relocation site and avoidance measures from the BO for SKR should be included in the revised MND and RMP, especially if the RMP is intended to meet the requirements from the BO and 2080.1 consistency determination. A-18

9. Required Mitigation Measure 2 (A)(4)(b), on page 4 of the draft MND, should be revised to read as follows, "Marked burrows shall be avoided by a distance of no less than a **10 to 15-foot buffer around the burrow to encompass the entire underground portion of the burrow complex.**" A-19

10. The following mitigation measures should be added to the revised MND and RMP to minimize impacts to SKR:

    a. All piles of loose dirt will be covered prior to the end of each work day with tarps to assure that SKR do not burrow into the loose dirt, thus minimizing the potential for take of additional SKR. A-20

    b. Trail construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic. A-21

Arroyo toad

11. We recommend the following changes and additions to the required arroyo toad mitigation measures in the revised MND. In addition, these changes should be carried over to all appropriate sections of the biotechnical report, RMP and VMP:

    a. Required Mitigation Measure 2 (A)(3)(a), on page 3 of the draft MND should be revised to read as follows, "Construction within arroyo toad breeding habitat will take place **outside** of arroyo toad breeding season (defined as March 15-July 31). Construction within arroyo toad upland asestivation habitat will take place **during** the arroyo toad breeding season (defined as March 15-July 31)." A-22

    b. Required Mitigation Measure 2 (A)(3)(b), on page 3 of the draft MND, should be revised to read as follows, "access to the project sites **will** be via existing access routes to the greatest extent possible." A-23

    c. Required Mitigation Measure 2 (A)(3)(f), on page 3 of the draft MND, should be revised to read as follows, "within the week prior to commencement of construction activities, but after exclusionary fencing has been installed, at least **three** surveys for arroyo toads **will** be conducted on consecutive nights within the fenced areas by a USFWS-approved biologist." A-24

12. Page 5-11 of the draft RMP states that the management approach for arroyo toad will include the eradication of non-native species within Santa Maria Creek. We recommend that a detailed "eradication plan" be developed and included as an attachment to the RMP. A-25

13. To minimize impacts to sensitive habitats, including suitable arroyo toad aestivation upland habitat, we recommend that the Alternative trail alignment using Ramona Municipal Water District lands be selected for the PAP. A-26

Coastal California gnatcatcher

14. The biotechnical report states that protocol gnatcatcher surveys were conducted in 2009. We recommend that updated gnatcatcher protocol surveys be conducted within areas of coastal sage scrub habitat that would be impacted (directly or indirectly) from the proposed project. A-27

15. The biotechnical report (page 1-52, Section 1.5.3.3) describes the Habitat Loss Permit (HLP) Ordinance. It is our understanding that for impacts within the NCMSCP, a Habitat Loss Permit (HLP) issued by the County (with approval by the Wildlife Agencies) would be required for impacts to CSS. Please verify that the HLP process will be required for the proposed project. A-28

General species comments

16. The biotechnical report indicates that focused surveys for special-status wildlife species were not conducted outside of the identified Preserve boundaries. However, portions of the proposed PAP would impact areas outside of the Preserve boundaries. We recommend that the appropriate biological surveys be conducted within these areas prior to finalization of the MND. All potential impacts to habitats and/or species, and associated mitigation for these impacts should be identified and discussed within the biotechnical report and revised MND. A-29a A-29b

17. The list of public agency approvals (page 17 of the draft MND) includes a biological opinion from the Service (pursuant to section 7 of the FESA). If "take" of federally listed threatened or endangered species will result from portions of the project that do not involve a federal nexus (e.g., trail maintenance and implementation of the RMP and VMP), then "take" authorization should be obtained through the development of a Habitat Conservation Plan (HCP) pursuant to section 10 of the FESA prior to implementation of those activities that will result in take. Therefore, the approval list should also identify the potential need for an HCP. A-30

18. The list of public agency approvals (page 17 of the draft MND) should identify the need for a CESA Permit (Fish and Game Code Section 2081), or if applicable, a Consistency Determination (Fish and Game Code Section 2080.1) if take of SKR will occur with this Project. A-31

19. We remain concerned over the potential impacts to sensitive species on the Preserve, including: Stephens' kangaroo rat; burrowing owl (*Athene cunicularia*/BUOW); golden eagle (a fully-protected state species); white-tailed kite (*Elanus leucurus*, a fully-protected state species); wintering raptors; San Diego fairy shrimp; and arroyo toad. In addition, many sensitive plants occur or have the potential to occur in the Preserve, including: San Diego thornmint (*Acanthomintha ilicifolia*); spreading navarretia; little mousetail (*Myosurus minimus*); San Diego button-celery *(Eryngium aristulatum var. parishii)*; San Diego goldenstar (*Bloomeria clevelandii*); and, Orcutt's brodiaea (*Brodiaea orcuttii*). Conserving and managing enough viable nesting and foraging habitats for these species and minimizing indirect effects will be important to obtain coverage in the NCMSCP and should be identified as a Priority 1 action in the RMP. A-32

20. The monitoring status and management directives for western spadefoot toad *[Spea (=Scaphiopus) hammondii*] should be identified at least as a medium priority in the revised RMP (they are currently identified as low priority). A-33

Mitigation Measures

21. Due to the high sensitivity of the Ramona Grasslands and its function as a core resource area in the County's NCMSCP, impacts to CSS (0.16 acres) should be mitigated at no less than A-34

2:1 and NNG (6.27 acres) at no less than 1:1. These ratios shall apply regardless of whether or not the project is approved before or after the NCMSCP is completed. Mitigation for all unavoidable impacts should occur within the Ramona Grasslands area and be approved by the Wildlife Agencies. A-34 cont.

22. According to the draft MND [mitigation measure A (Biological Resources, No. 8)] and the biological technical report (see measure MMBio4a) for the proposed project (ICF, August 2011), significant impacts to sensitive natural communities resulting from unavoidable impacts will be offset by the offsite preservation of habitat, the purchase of mitigation credits within an approved mitigation bank, or in accordance with County Board Policy I-138 at established mitigation ratios (e.g., in accordance with ratios outlined in the County's adopted MSCP SAP or, when adopted, the NCMSCP). As a reminder, under the County's adopted MSCP SAP, all mitigation banks require Wildlife Agency approval and must be consistent with "*The Official Policy on Conservation Banks, adopted April 17, 1995 by the California Resources Agency and CalEPA*" as stated in Board of Supervisors Policy-117 (Mitigation Bank Policy) and attached to the Implementing Agreement for the adopted MSCP SAP. A-35

Resource Management Plan

23. The RMP should list the property owners and type of ownership (fee title, easement, etc.) and management actions that are required for the Ramona Grasslands Preserve and surrounding areas. We recommend that a new table (e.g., Land Ownership within and Surrounding the Preserve), be added to the revised RMP. The RMP would also benefit by including a land use map with ownership of other conserved lands or adding the map to an existing figure. A-36a A-36b A-36c

24. We recommend that the revised MND and RMP incorporate any Eagle Conservation Plan developed for the Preserve to address potential impacts to golden eagles and other migratory raptors. A-37

25. Similar to past ASMDs prepared for the Preserve [e.g., Ramona Grasslands Preserve Area Specific Management Directives (January 2007)], the revised MND and RMP should include information on operation and maintenance for the Preserve, including staffing, Park Rangers, Park Attendants, live-in volunteers, primary duties, Operation Division, etc. (see section 7.0 of that plan). A-38

26. Where the revised MND and/or RMP references the NCMSCP, please note that it is still in-progress; therefore, coverage for the species and activities at the preserve would not occur until the NCMSCP is finalized and permits are issued by the Wildlife Agencies. For instance, the draft MND proposes mitigation ratios and monitoring/maintenance measures for the golden eagle based on the draft NCSMSCP. This RMP may need to be updated/ revised to ensure consistency with the NCMSCP Framework Management Plan (FMP), Planning Unit goals, species-specific requirements, covered species list, or other components of the A-39

pending NCMSCP in order for activities in these preserves to receive take authorization. Updates may also be required as regional monitoring strategies and protocols get revised. A-39 cont.

27. The County's adopted South County FMP (page 3) incorporates a requirement for the subsequent preparation and implementation of "Area-Specific Management Directives". As discussed in the FMP, "[a]rea-Specific Management Directives will be developed using generally accepted practices and procedures for management of biological preserves, and will comply with the establishment processes outlined in this Framework Management Plan. Area-Specific Management Directives will be developed and implemented to address species and habitat management needs in a phased manner for logical and discrete areas, once conserved as part of the MSCP preserve, including species specific management required in Table 3-5 or as condition of take authorization." This information should be included in the revised RMP (e.g., Section 1.1., Purpose of Management Plan and 5.2, Biological Resources Element). A-40

28. The Purpose of the Management Plan section of the RMP (e.g., Section 1.1) should include the management goals and objectives from the County's adopted MSCP Framework Management Plan (page 11), including: a) to ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MSCP Preserve; b) to protect the existing and restored biological resources from activities causing disturbance or which are incompatible within and adjacent to the MSCP Preserve while accommodating compatible public recreational uses; c) 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; d) to facilitate monitoring of selected target species, habitats, and linkages in order to ensure long-term persistence of viable populations of priority plant and animal species, and to ensure functional habitats and linkages; and e) to provide for flexible management of the MSCP Preserve that can adapt to changing circumstances to achieve the above objectives. A-41

29. The RMP should clearly summarize the top management issues/stressors in Section 5.0 (Resource Management). If public access is going to occur in the Preserve, the revised MND and RMP should include provisions for monitoring of the intensity and use of trails, especially where in close proximity to known locations of sensitive species. Specific triggers should be identified as to when trail(s) will be closed. A-42a A-42b

30. Any erosion and drainage problems within the preserve should be identified and mapped as part of the RMP, with recommendations for restoration/remediation included in Section 5.0 (Resource Management). Also, if any grading would be required to correct erosion, restoration may be required to offset any temporary impacts, and mitigation may be required for permanent impacts directly or indirectly resulting from new infrastructure. A-43

31. The locations of all trash receptacles, access points and fencing should be mapped in the RMP. We recognize these may change in the future based on observed human use patterns or newly discovered resources or management tasks. A-44

32. Similar to past ASMDs prepared for the Preserve [e.g., Ramona Grasslands Preserve Area Specific Management Directives (January 2007)], the operations and maintenance expected time use in the Preserve should be included in the revised RMP. A conceptual/framework schedule of major tasks in the Preserve by priority, responsible party, timeframe, estimated cost, etc. should also be included in the RMP. A-45

33. The RMP (e.g., Section 1.0) should include a table showing an anticipated schedule of updates over the next 20 years, including potential major issues to be evaluated over time which may trigger the need to update the RMP (e.g., completion of NCMSCP). Such potential issues should be assessed in subsequent annual reports for the Ramona Grasslands Preserve. A-46

34. Please ensure that the revised MND and RMP identify all brush clearing areas that would be required within the Preserve, and/or clearing from existing adjacent development that may impact the preserve, and provides appropriate mitigation. The access routes for conducting fuel management activities and measures for removing the cleared material from the site (if appropriate), especially where invasives are present, should also be identified in the RMP. Where these areas occur within or adjacent to sensitive species, restrictions on conducting activities during the breeding/nesting season and avoidance of narrow endemic plant species should be identified as a mitigation measure in the revised MND and RMP. A-47

35. At such time that a NCMSCP is approved and permits are issued by the Wildlife Agencies, this RMP should be revised/updated to include private lands under this RMP that will contribute to NCMSCP goals and include a management program for those lands. This should incorporate individual habitat management plans (HMPs) for private lands, as well as private lands less than 50 acres that contribute to NCMSCP goals and are otherwise not covered by the individual HMPs. For the areas of the Preserve located in the MSCP SAP, this should occur now. A-48

36. The revised MND and RMP should identify wildlife movement areas and other regional corridors (e.g., major wintering area for raptors) and evaluate how the proposed project may result in direct or indirect impacts to these areas from habitat fragmentation, increased activity in the Preserve and loss of sensitive habitat. A-49

37. The narrow endemic status from the MSCP SAP and NCMSCP should be added to the species profile (e.g., San Diego thornmint) in the RPM (Section 5.2.2). A-50

Preserve Access Plan (PAP)

38. The information and measures to reduce impacts to biological resources discussed at our August 30, 2011 meeting) should be incorporated into a revised MND and RMP. Important points discussed at that meeting included (but are not limited to) the following: A-51

a. Trails associated with the Cummings Ranch (e.g., located in the southeast area of the Preserve), Montecito Ranch, or any other private facility should not be included as part of this project as those project have not been approved. If applicable, these trails should be included in the cumulative analysis of the proposed project. A-51 cont.

b. We recommended that the proposed trail realignment associated with the north-south trail in the northeastern portion of the project area be removed and that the trail follow the existing trail alignment to minimize impacts to native habitats from the construction and maintenance of a new trail segment. We continue to recommend that this re-alignment be removed from the proposed trail plan. A-52

39. The proposed project should locate trails on existing disturbed areas/trails and in the least sensitive area of the Preserve, away from active bird nests (e.g. eagle) and other sensitive wetland habitats (e.g., areas occupied by southwestern pond turtle). These directives should be incorporated into the management actions as a Priority 1 for the Preserve. A-53

40. The biotechnical report (page 1-7, Section New Trails) states that the new trail segment that connects the northeastern portion of the Preserve with Rangeland Road would follow guidelines for Type C (Primitive) trails, except that it would be approximately 10 feet wide rather than 4 feet wide like the other Type C trails. Please clarify the need for an expanded trail width at this location. A-54

41. Please identify where signs and/or fences will be used to keep trail users on the designated trails. A-55

42. The draft MND and RMP indicate that existing trails not part of the proposed PAP would be closed and restored. For trail closures, we recommend that the revised MND and RMP incorporate active/natural restoration based on the soils and erosion patterns observed on site. These natural methods may include active revegetation (e.g., container plants), reseeding, propagation, etc., rather than strictly rely on passive methods which may not quickly or fully restore the area or address erosion issues. For these restoration areas, we recommend that a conceptual plant palette be identified in the revised RMP/VMP. A-56

Monitoring Program

43. The following monitoring and management directives should be included in the revised RMP: A-57

a. Collect and continuously update information that will inform adaptive management and grazing prescriptions (e.g., reduction in invasive non-native grass biomass);

b. Collect information on the presence of invasive non-native plant species to direct ongoing invasive non-native plant species removal efforts in the Preserve; A-58

c. Document the persistence of SKR and arroyo toad in the Preserve; A-59

d. Measure changes in physical condition, hydrology, and water quality of Santa Maria Creek; A-60

e. Track the distribution and abundance of non-native animal species (e.g. bullfrogs); A-61

f. Track the responses of biological resources to management actions; A-62

g. Monitor habitat for post-fire recovery, especially for gnatcatcher; A-63

h. Monitor for areas to be restored under the PAP (e.g., Old Survey Road 97); A-64

i. Manage the Preserve as a core grasslands area connecting habitat to south and north; and, A-65

j. Recover riparian habitat along Santa Maria Creek as grazing plan is implemented. A-66

k. Identify golden eagle and SKR as a high monitoring and management priority (similar to the burrowing owl), especially as it relates to trail restoration and trail usage monitoring. A-67

44. The monitoring section of the RMP (Section 5.2/Biological Resources Element) cites 5-year intervals as the standard timeframe for conducting future surveys. Five years may be appropriate for some activities; however, it may not be appropriate for other activities and certain species. Five years may also not be sufficient to evaluate changes that may occur with the onset of designated public access. Also survey intervals should be coordinated with the MSCP SAP and NCMSCP and future regional monitoring efforts currently underway in the County. Until these protocols are completed, we recommend stating the surveys for species will be conducted no later than 5-year intervals. The RMP should clearly state that the monitoring protocols for the Ramona Grasslands Preserve RMP will ultimately be consistent with all other regional monitoring efforts in San Diego County. A-68

45. Impact avoidance buffers for all nesting raptors, including the golden eagle, during preserve activities should be included in the environmental document and in the RMP as a Priority 1. If additional nesting surveys are required to determine exact locations, they should also be added to the revised MND and RMP as Priority 1. This directive is essential to avoid and/or resolve potentially significant conflicts between current and any future proposed uses in the preserve and nesting raptors. For example, indirect impacts to the golden eagle could be minimized through signage, the planting of cactus thickets along trails, phasing the opening of trails to ensure vegetation has recovered from fire effects to its former density, and seasonal trail closures. These and other appropriate measures should be incorporated into the revised MND and RMP. A-69

46. The RMP should identify a general timeframe for coordination of Plan updates (e.g., at least once every 5 years) as well as the method of reporting on the coordination activities. At this time it should be anticipated as a section of the County's existing MSCP SAP and/or future NCMSCP annual report; however, efforts are being made to facilitate reporting through the multi-taxa database which may prove much easier for land managers. A-70

47. We recommend that the RMP use the definition of adaptive management included in the adopted MSCP SAP and draft NCMSCP and specify in Section 5.0 (e.g., page 5-3) that Priority 1 establishes those ASMDs that protect the resources in the MSCP Preserve, including management actions that are necessary to ensure that the Covered Species are adequately protected and are required to be implemented for take authorization. Priority 2 are those ASMDs that are other than those required for covered species status and other long-term items that may be implemented during the life of the plan as funding becomes available. The Biological Resources Element (Section 5.2) should use Priority 1 and 2 for specific items, rather than identifying them as "high", "medium" or "low" priority without any associated time frame and connection back to MSCP conditions of coverage. A-71

48. The RMP notes the presence of cowbird (*Molothrus ater*) on site. The PAP includes equestrian uses throughout the Preserve. A manure management program, cowbird monitoring, and triggers that will be used to implement a cowbird trapping program should be included in the revised MND and RMP as a Priority 1. A-72

Vegetation Management Plan

49. The VMP (page 3-8, Section 3.4.1) states that grazing is proposed within Management Unit 1A for 2 to 4 months out of the year (January to February and August to September). Please clarify which portions of Management Unit 1A will only be grazed for 2 to 4 months. A-73

50. The VMP (page 3-9, Section 3.4.2) states that cattle should be restricted from the Santa Maria Creek riparian corridor in the southeastern and southwestern portions of the Preserve for the majority of the year. Please clarify what is meant by "majority of the year" and whether these areas are the portions of Unit 1A referenced in Section 3.4.1 that will be grazed January to February and August to September. A-74

51. The VMP (page 3-9, Section 3.4.2) states that the northwestern portion of the Preserve is currently limited to 10 bulls June through November. Please clarify if the portion referenced is within Management Unit 1A, 4A, 4B, or 5. In addition, if this portion is within Unit 1A and the Santa Maria Creek corridor, please clarify if this location contains suitable arroyo toad breeding habitat. If suitable arroyo toad breeding habitat is located within this area, then the grazing should not occur during the arroyo toad breeding season (defined as March 15-July 31) to avoid impacts to breeding arroyo toads. A-75

52. The RMP and VMP should provide a proposed restoration palette (conceptual plan) for the restoration areas (both access areas and vernal pools). These palettes should be provided for the invasives removal, post-fire regeneration, access control, etc. A-76

53. We recommend that the proposed grazing plan within the Preserve closely follow the Framework Management and Monitoring Plan prepared by Conservation Biology Institute (CBI) for The Nature Conservancy [Framework Management and Monitoring Plan, Ramona Grasslands Open Space Preserve, San Diego County, California, prepared by CBI (August 2004, Revised October 2004)]. Specifically, section 6.0 (Management Elements and Goals) provide the basis for a suitable grazing program focusing on biological resources at the Preserve. Under that Plan, the managed grazing program was developed around three major biological habitats: 1) loamy grasslands; 2) clayey grasslands; and, 3) the Santa Maria Creek corridor (riparian corridor) as summarized in the following table. The following recommendations from the CBI plan that should be included in this RMP are as follows: A-77

    a. Fence trails on both sides with appropriate materials (e.g., split rail fencing) to establish a clear trail corridor and to prevent users from leaving the established trail and creating *volunteer* trails. Since livestock will be using portions of the Preserve, fencing will also prevent public access to livestock areas. Fences will be constructed of four-strand fencing to keep cattle from the trail corridor. In addition, consider the operational needs of livestock managers when planning trail alignments and fencing (e.g., locations of gates to allow cattle to cross the trail). Inspect and maintain fencing regularly. A-78

    b. Due to the sensitive nature of the natural resources in the Preserve, trail users will not be allowed unrestricted access to portions of the Preserve outside of the trail corridor unless accompanied by DPR Ranger-led hike. A-79

    c. Due to the fact that the scale of management units are much larger than distributions of some resource types (e.g., alkali playas and some vernal pools are contained within a loamy grassland management unit), it may be necessary for the habitat manager to regulate grazing at a smaller scale within the management unit (e.g., use of temporary or electric fencing) or employ alternative approaches to achieve management objectives. A-80

    d. The primary management emphasis for loamy grassland habitats in the Preserve is long-term maintenance of conditions suitable for SKR and raptors, and maintaining viable populations of rare alkali playa plant species. A-81

    e. Decrease the cover of invasive non-native annual grasses and forbs and the amount of thatch from clayey grasslands and in the vernal pools to improve biological functions. Quantitatively monitor the changes in vernal pool vegetation composition. A-82

    f. Manage grazing and eliminate aggressive invasive non-native plant species within the Santa Maria Creek corridor. Quantitatively monitor the changes in riparian vegetation A-83

community structure and composition, water quality, arroyo toad abundance and distribution, and breeding riparian bird species community composition, and channel characteristics in the Santa Maria Creek corridor. Every 3-5 years or after significant flooding events, monitor changes in the morphology of the Santa Maria Creek Channel by measuring the physical dimensions of the channel and substrate composition along a series of established cross-sections. A-83 cont.

g. Maintain and enhance arroyo toad habitat quality. Annually monitor the distribution and relative abundance of arroyo toads and characteristics of their habitat in the northwestern portion of the Preserve. A-84

h. Enhance habitat quality for riparian-obligate species, particularly breeding birds. A-85

i. Monitor the changes in distribution and relative abundance of SKR, the characteristics of their habitat, and abundance and composition of the raptor community. A-86

j. Annually conduct quantitative surveys of breeding and wintering raptors and monitor the distribution and abundance of breeding riparian bird species. A-87

We appreciate the opportunity to comment on the draft MND and RMP for the proposed Ramona Grasslands Preserve. Because of the deficiencies in the draft MND and associated documents as discussed above, we recommend that the draft MND not be adopted but rather revised to address Wildlife Agency concerns; otherwise, we believe that the project will result in significant unmitigated impacts to biological resources. The Service also recommends that the County seek our written concurrence that the revisions have fully addressed the requirements of the Bald and Golden Eagle Protection Act. We will continue to work with your agency in the development and review of a PAP and RMP that avoids impacts to listed and sensitive and is compatible with the conservation needs of all the biological resources for which the Preserve was established. Questions regarding this letter and further coordination should be directed to Randy F. Rodriguez of the Department at 858- 637-7100/ RFRodriguez@dfg.ca.gov; or Michelle Moreno of the Service at 760- 431-9440/ Michelle_Moreno@fws.gov. A-88

Sincerely,

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

Stephen M. Juarez
Environmental Program Manager
California Department of Fish and Game

STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

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November 21, 2011

Ms. Megan Hamilton, Planner
County of San Diego Department of Parks & Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

Re: SCH#2011111054 CEQA Notice of Completion; proposed Mitigated Negative Declaration for the **"Ramona Grasslands Preserve;"** located in the vicinity of the Community of Ramona; San Diego County, California

Dear Ms. Hamilton:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project. B-1

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. B-2

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. B-3

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were identified** within the project area identified (Twp 13 South; 1 East). Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to. California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction. The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) B-4

and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r). B-4 cont.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15. B-5

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources. B-6 B-7

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.' B-8

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity. B-9

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. B-10

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

B-11

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

California Native American Contacts
San Diego County
November 21, 2011

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
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Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
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Viejas Band of Kumeyaay Indians
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La Posta Band of Mission Indians
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619-478-2125

Kumeyaay Cultural Historic Committee
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San Pasqual Band of Mission Indians
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(760) 782-9092 Fax

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011111054; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Ramona Grasslanads Preserve; located in the vicinity of the Community of Ramona; San Diego County, California.

California Native American Contacts
San Diego County
November 21, 2011

Kwaaymii Laguna Band of Mission Indians
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Inaja Band of Mission Indians
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2005 S. Escondido Blvd. Diegueno
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Ipai Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
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Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
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San Pasqual Band of Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 365 Luiseno
Valley Center, CA 92082 Diegueno
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council@sanpasqualtribe.org
(760) 749-3876 Fax

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
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FIREFIGHTER69TFF@AOL.COM
((619) 884-8437

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011111054; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Ramona Grasslanads Preserve; located in the vicinity of the Community of Ramona; San Diego County, California.

California Native American Contacts
San Diego County
November 21, 2011

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
(619) 478-2113

Campo Band of Mission Indians
Andrea Najera, Cultural Resources Manager
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA
(619) 478-9046
(619) 478-5818 - FAX

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2011111054; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Ramona Grasslanads Preserve; located in the vicinity of the Community of Ramona; San Diego County, California.

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

December 7, 2011

Ms. Megan Hamilton, Group Program Manager
County of San Diego, Department of Parks and Recreation
5500 Overland Drive, Suite 410
San Diego, California 92123
Megan.Hamilton@sdcounty.ca.gov

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE RAMONA GRASSLANDS PRESERVE PROJECT, (SCH #2011111054), SAN DIEGO COUNTY

Dear Ms. Hamilton:

The Department of Toxic Substances Control (DTSC) has received your submitted draft Initial Study (IS) and a draft Mitigated Negative Declaration (MND) for the above-mentioned project. The following project description is stated in your document: "The proposed Ramona Grasslands Preserve Project (Project) would provide resource management and recreational use improvements to enhance the existing Ramona Grasslands Preserve (Preserve). The Project proposes 8.6 miles of non-motorized multi-use trails, including 6.5 miles of existing trails and 2.1 miles of new trails within 3,490 acre Ramona Grasslands Preserve. In addition, 2.0 miles of pathways are proposed along Highland Valley and Rangeland Roads. The Project is located approximately 6.0 miles east of Interstate 15 (I-15), 1.5 miles north of State Route 78 (SR-78), and 2.0 miles west of downtown Ramona in unincorporated San Diego County. The Project area is within the Santa Maria Valley, which consists of a broad basin surrounded by gentle hills and rocky rises. Areas around the periphery of the Preserve are used for dry farming, and small citrus and avocado orchards. The Project would not displace existing nor preclude future agricultural uses. The property is zoned S88 Specific Plan which is intended to accommodate Specific Plan areas shown in the San Diego County Plan and A70 Limited Agriculture".

Based on the review of the submitted document DTSC has the following comments:

1. The MND should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies: C-1

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

C-1 cont.

2) The MND should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

C-2

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the MND.

C-3

4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies. C-4

5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. C-5

6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. C-6

7) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. C-7

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. C-8

9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489. C-9

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,

Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
Attn: Nancy Ritter
nritter@dtsc.ca.gov

CEQA # 3420

The Nature Conservancy
Protecting nature. Preserving life.™

The Nature Conservancy
San Diego Field Office
402 West Broadway, Suite 1350
San Diego, CA 92101

Tel: (619) 209-5830
Fax: (619) 702-7621
nature.org
nature.org/california

January 6, 2011

VIA EMAIL: Megan.Hamilton@sdcounty.ca.gov

Megan Hamilton
Program Manager
County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

Re: Mitigated Negative Declaration for the Ramona Grasslands Preserve Project

Dear Megan:

On behalf of The Nature Conservancy (Conservancy), thank you for the opportunity to review and comment on the Draft Mitigated Negative Declaration (MND) and Environmental Initial Study (Initial Study) for the proposed Ramona Grasslands Preserve project (Project). The County of San Diego (County) has been an important partner to the Conservancy for many decades and together we have achieved conservation of an incredible range of species and habitats in our country's most biologically diverse county.

As a nonprofit organization dedicated to the conservation of the lands and waters on which all life depends and one of the partners in the establishment of the Ramona Grasslands Preserve (Preserve), we are pleased that the MND and Initial Study, including the Biological Resources Report (BRR), Resource Management Plan (RMP) and Vegetation Management Plan (VMP), provide a thorough description of the Project, the protected lands comprising the Preserve (Preserve Lands), the biological resources and other conservation values associated with and located throughout the Preserve (collectively, Conservation Values), and the planned future management of the Preserve by the County Department of Parks and Recreation (DPR). Below we have also listed some comments and concerns along with certain areas where we believe the Project, MND and/or Initial Study may be improved.

1. The MND and Initial Study correctly note that a significant amount of Federal and State funding contributed to creating the Preserve. More specifically, the United States Fish and Wildlife Service (USFWS) provided more than $20 million in grants from the Cooperative Endangered Species Conservation Fund (section 6 of the Endangered Species Act) for the acquisition of the Preserve Lands. In addition, the State provided close to $10 million in grant funding, more than one-third of which came from the Wildlife Conservation Board (WCB). Grant and deed restrictions associated with the Federal and State funding encumber the Preserve Lands. Concerning the grant and deed restrictions in favor of USFWS and WCB in particular, these require, for example, that the Preserve Lands be used for the purposes of "plant and wildlife habitat preservation, restoration and management, wildlife-oriented education and research, and for compatible public uses, including non-motorized trail use, all as may be

D-1

consistent with wildlife habitat preservation." We recommend including in an appendix to the RMP copies of the Federal and State grant and deed restrictions. D-1 cont.

2. TNC conservation easements and deed restrictions also encumber most of the Preserve Lands as a result of TNC acquiring and then transferring these Preserve Lands to the County. Similar to the USFWS and WCB grant and deed restrictions, their overriding or primary purpose is the continued protection of the Preserve Lands. Among the requirements are that the Preserve Lands "shall be used exclusively for the preservation, restoration and management of the Conservation Values . . . ," that permissible multi-use trails "shall be located and constructed in a manner that causes the least impact to the Conservation Values as is reasonably practicable," and that the Preserve Lands "shall not be used for mitigation to compensate for adverse environmental impacts . . . ." This last restriction is expressed in the conclusion in numerous parts of the MND and the Initial Study that the impacts of on-site activities shall be mitigated off-site. We recommend including in an appendix to the RMP copies of the TNC conservation easements and deed restrictions; section 2.4.3 of the RMP may be the appropriate place to reference these documents. In addition, the information presented in this section and Figure 8 contains a couple of small errors. For example, TNC deed restrictions encumber Cagney Ranch in the southeastern portion of the Preserve and Oak Country I is encumbered by a TNC conservation easement rather than deed restrictions. A TNC conservation easement will also soon replace the TNC deed restrictions burdening Oak Country II. D-2 D-3

3. Please note that nothing in the MND and Initial Study, including the BRR, RMP and VMP, amends the TNC conservation easements and deed restrictions. In the event of an inconsistency or conflict, the TNC conservation easements and deed restrictions shall prevail. In addition, in order to help avoid any such conflict or other potential issues in the future, TNC requests that DPR provides TNC with advance notice (if advance notice is not already required by the TNC conservation easements and deed restrictions) prior to engaging in activities or uses on the Preserve Lands that DRP believes are permitted and that may disturb, alter or impair the Conservation Values. D-4

4. On page 21 of the Initial Study, it provides "fuel modification zones adjacent to existing residential development or habitable onsite structures would be permanently maintained at a reduced density of shrubby woody plants; however, these areas would still be vegetated." And on page 6-4 of the VMP, it states "trimming, thinning, and/or removing vegetation on the Preserve if a homeowner's property is adjacent to the Preserve to achieve defensible space." The TNC conservation easements and deed restrictions permit the clearing of defensible space for fuel management purposes to the extent required by law. Where the law (for example, the County Code) is permissive, any clearing must comply with the TNC conservation easements and deed restrictions. Additionally, language should be added to clarify that the shrubby woody plants would be native and naturally occurring individuals and that would be left in place as opposed to being replaced by species not native to the Preserve. Also, rather than relying on fuel modification or defensible space on the Preserve, the County must comply with all zoning code and other applicable set back requirements for construction adjacent to protected open space. Building setbacks should be sufficient to accommodate compliance with all laws with respect to clearing and fuel modification, without relying on the clearing of defensible space on the Preserve Lands encumbered by open space, biological and conservation easements and/or grant and deed restrictions. D-5 D-6 D-7

5. In addition to the Preserve Lands owned by the County, certain protections are or may be in place concerning approximately another 1,000 acres of neighboring lands located contiguous to or in the vicinity of the Preserve Lands. These include open space easements held by the County over lands owned by the Ramona Municipal Water District and several other parties in the area, the "environmental subdivision" parcels located immediately northwest of the Preserve, the parcel identified as Assessor Parcel Number (APN) 276-110-01 owned by the San Dieguito River Park Joint Powers Authority, the "open space" parcel APN 277-050-32, and parcels owned by the Wildlife Research Institute. The MND and Initial Study should better describe these lands and, if possible, the related protections in place. Some or many of these lands, such as those burdened by the County open space easements, may also appropriately be officially included as part of the Preserve. D-8

6. Additional comments, concerns and areas for improvement include:

- Figure 3 in the MND and Initial Study shows a trail in the northwestern portion of the Preserve that does not appear to connect to an off-site trail. Please provide more information on its context. If the trail does not connect to an offsite trail, it could lead to potential trespassing issues on the property north of the Preserve or result in unintended impact on the Preserve as people may create an unauthorized loop trail leading back to the trailhead. D-9

- Page 1-19 of the BRR: Saltgrass is the most common native species in the grasslands of the Preserve. Areas dominated by this species are described as Saltgrass Grassland in the Draft Vegetation Communities of San Diego County by Oberbauer et al 2008. The amount of native grassland on the Preserve has been under estimated as a result of not recognizing this accepted grassland type in San Diego. D-10

- Page 1-22 of the BRR: TNC recorded significant stands of *Nassella* (needlegrass) and the highest density of native perennial wildflowers in the southwestern portion of the Preserve. Portions of this section of the Preserve should be considered Valley Needlegrass Grassland. D-11

- Page 1-22 of the BRR: TNC has recorded the presence of a second Engelmann oak east of the pond in November 2011. It is a large tree located near one of the test wells. D-12

- Page 1-32 of the BRR: the map in Figure 7 is inconsistent with where San Diego Horned Lizard is described to be found (points in SW and NW, but not SE). D-13

- Page 3-6 of the BRR: TNC supports conducting surveys of nesting golden eagles and trail use in the vicinity of the known (and any future established) nest sites to determine appropriate management including seasonal trail closures to ensure the continued nesting of this majestic species in the immediate vicinity of the Preserve. D-14

- Page 6-3 of the VMP: stating that a portion, if not all of, the Preserve burns every 5-17 years is confusing and hard to interpret. A quick calculation based on CalFire data shows that within the Preserve boundary, approximately 4,800 acres have burned since 1950 or an average of around 80 acres per year (2% of the Preserve). At that rate it takes 44 years for the area within the Preserve boundary to burn. Presenting this data or a similar analysis could reduce confusion and the D-15

potential for neighbors to demand fuel modification when presented with information that clarifies the Preserve actually does not burn every 5 years, but actually much less frequently. D-15 cont.

- Page 6-4 of the VMP: the term brush should not be used to describe sage scrub (a globally significant habitat) and chaparral (an important habitat for many of the sensitive species) vegetation communities. D-16

- Page 7-13 of the VMP: "It is not recommended that prescribed fire be conducted in the chaparral or coastal sage scrub areas for at least 20 more years, because introducing fire in less time could degrade the quality of the vegetation and lead to type conversion." This statement should be amended to be consistent with the discussion on Page 6-3 where it is stated that the fire return interval is 35-100 years for these communities. The text should be amended to ensure a prescribed fire in these communities is never conducted resulting in a fire return interval of less than 35 years for a given location, unless adequate biological information is presented that justifies a shorted interval. In addition, any such proposed use of prescribed fire or any other management tool that disturbs these communities on the Preserve Lands covered by the TNC conservation easements and deed restrictions would require formal consultation with and prior written approval from TNC (and probably also USFWS, WCB and the State Department of Fish and Game) along with a written plan agreed upon by the parties. D-17

- Page 5-30 of the RMP: "The long-term management and monitoring will be in accordance with DPW's Permits, Habitat Management Plan, and the Wetland Mitigation Plan." The above-referenced Federal and State grant and deed restrictions along with the TNC conservation easements and deed restrictions should be added to this sentence. D-18

Thank you and we would welcome the opportunity to discuss the above with you and offer clarifications or additional input.

Sincerely,



Chris Basilevac
Senior Project Director

Megan Hamilton
Parks and Recreation
5500 Overland Avenue
Suite 410
San Diego, CA 92123

December 15, 2011

Dear Megan Hamilton,

This letter is regarding your notice of intent to adopt a mitigated negative declaration for the Ramona Grassland trail plan.

After reviewing the plan which we have discussed with you in previous meetings, it is still considered by the Wildlife Research Institute, our Board of Directors, and myself as a wildlife biologist who has studied Golden Eagles for over 40 years, to be extremely detrimental to the survival of the Golden Eagles breeding and foraging in and around the Ramona Grassland Preserve. E-1

The Wildlife Research Institute has worked for over 16 years to preserve the Ramona Grasslands. We now find our self in a position where the very agencies assigned to protect the grasslands are becoming the problem by placing recreation ahead of all other concerns for wildlife preservation. E-2

Your plans for the trails on your map and your staging areas are placed where access to nesting cliffs and disturbance of foraging areas will be unavoidable. This concurs with the attached Fish and Wildlife Service and California Fish and Game letters of August 2010. E-3

It is obvious from your lack of changes to the trails that we discussed two years ago, that the Department of Parks and Recreation places recreation and parks ahead of all plans for the **Multiple Species Conservation Program** adopted by the citizens of San Diego in 1997. Your total lack of regard for the long-term survival of a species, such as Golden Eagles, demonstrates that Department of Parks and Recreation is either not willing or not qualified to manage our wildlife resources. Further, the conservation intent of this land transfer from The Nature Conservancy is being ignored. E-4

This has been shown over and over in other land acquisitions that were meant to protect Golden Eagles and the county has created trails that have caused the extirpation of golden eagle territories. This has happened at the Derbas Property, acquired to help protect the Del Dios pair of Golden Eagles. We advised at the time of purchase, working with County Supervisor Pam Slater, that no trails should be built above the nest sites, but County Parks and Recreation built trails above every known nest site causing nest abandonment, ultimate nesting failure, which finally lead to complete extirpation of this pair. In addition, County Parks and Recreation, has built trails above Gower Mountain, another BLM property (Ramona) Golden Eagle nest cliffs, causing extirpation. E-5

Currently, trails built by the County Parks and Recreation, above the El Cajon Mountain pair of golden eagles, are causing increased disturbance, which will also ultimately lead to extirpation. On Saturday, December 10, 2011, two hikers were observed climbing E-6

directly above the golden eagle's west nest. On Sunday, December 11, 2011, two hikers were rescued by county sheriff helicopters, within 200 feet of the currently active golden eagle's east nest. The County has responsibilities for the protection of these wildlife resources when the Bureau of Land Management turned over these lands for management. There is evidence to show a complete failure to adhere to these responsibilities. E-6 cont.

The county has failed to protect or manage for the Golden Eagles on these lands. Currently, the BLM, the Fish and Wildlife Service, California Fish and Game, and the US Forest Service, are all requiring Sempra Utility to have daily monitoring on all Golden Eagle nest sites within 4000 feet of the Sunrise Powerlink. The County seems to have little or no interest in protected these same Golden Eagle nests from the public. Sempra is going out of their way to prevent and avoid disturbance while at the same time the County fails to control public access to these nest sites during the critical breeding season. It has been proven that human disturbance at nest sites is the number one cause of nest abandonment. The County's failure to prevent this disturbance at the above examples, proves you cannot and will not be able to protect the Golden Eagles in the Ramona Grasslands if the trails and staging areas are allowed to be constructed as you currently envision them. E-7

We strongly oppose the construction of the trail plan as it is proposed in your Mitigated Negative Declaration of November 8, 2011.
Our professional opinion is that this trail plan will have a Significant Impact on the future survival of Golden Eagles in the Ramona Grasslands. Your mitigation plans in your report are inadequate, unrealistic, and naïve. E-8

Sincerely,

Dave Bittner, Wildlife Eagle Biologist 760-789-3992 cell: 760-492-1552
Executive Director, Wildlife Research Institute, Inc
18030 Highland Valley Road Ramona, CA 92065

Cc: WRI Board of Directors
San Diego County Supervisors
Heather Beeler, Eagle Permit Specialist US Fish & Wildlife Service
Chris Basilevac, The Nature Conservancy
Larry La Pre, BLM
Dave Mayer, Department of Fish & Game
Mark Babelk, US Fish & Wildlife Service
Karen Goebel, US Fish & Wildlife Service
Stephen Jaurez, California Department of Fish & Game
Eric Kershner, US Fish & Wildlife Service
Loren Nancarrow, Fox 5 News
San Diego Union Tribune, Editor
North County Times, Editor

Mountain-Castro, Jenelle

From: cjlinton73@aol.com
Sent: Tuesday, December 13, 2011 7:06 AM
To: Hamilton, Megan
Cc: Bever, Michael; Price, Jennifer
Subject: Re: Ramona Grasslands

Thank you for the information Megan. Please consider my comments as part of the public comment period. I will not need to meet in January and certainly not after the comment period is over. This is just another case of County Parks ignoring Tribal concerns and native human remains.

Clint

-----Original Message-----
From: Hamilton, Megan <Megan.Hamilton@sdcounty.ca.gov>
To: cjlinton73 <cjlinton73@aol.com>
Cc: MBever <MBever@icfi.com>; Price, Jennifer <Jennifer.Price@sdcounty.ca.gov>
Sent: Thu, Dec 8, 2011 6:01 am
Subject: FW: Ramona Grasslands

Clint,
Thank you for your comments. Last year we conducted a number of public meetings, as well as individual stakeholder meetings with various groups including Native Americans, to gather input on public access at the Ramona Grasslands Preserve (see attached Native American stakeholder meeting notes).

The trail route that is currently out on public review was designed based on:

- public input received during those meetings
- opportunities and constraints that were identified during our extensive biological and cultural surveys of the property
- requirements associated with property acquisition funding sources
- deed restrictions and easements.

For example, funding sources utilized for the purchase of the northwest portion of the Preserve requires public access. However, there is no longer a loop trail proposed in the northwest portion of the Preserve. Additionally, the route chosen goes behind a bluff, offering views of Pauma Valley and only a brief view of the offsite cliffs.

Trail use monitoring is proposed for the recently opened Oak Country II trail system to determine types and numbers of users prior to opening additional portions of the Preserve. The trail usage monitoring results will assist in the decision making process regarding the timing of opening the northwest and northeast portions of the Preserve to the public and if seasonal restrictions will be needed.

We can meet again with tribal representatives to address concerns and discuss additional ideas for protecting cultural resources within Ramona Grasslands Preserve. Public review will finish up December 16, 2011. We will then be preparing a response to comments. Let's plan on meeting mid to late January 2012 (some potential meeting times and dates will follow).

Thanks!

Megan Hamilton
Group Program Manager/Resource Management Division
County of San Diego Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego CA, 92123
(858) 966 1377

PARKS AND RECREATION
COUNTY OF SAN DIEGO
www.sdparks.org

From: cjlinton73@aol.com [mailto:cjlinton73@aol.com]
Sent: Wednesday, December 07, 2011 8:50 AM
To: Hamilton, Megan; MBever@icfi.com
Subject: Ramona Grasslands

Dear Megan,

This response is written with regard to the proposed trails for the Ramona Grasslands area.

As stated is the past through multiple consultations with Tribal representatives, we are opposed to the development of the area. New trails and enhancement of existing roads/trails will bring cumulative adverse affects to the area. The area contains several Arch sites and most notable, the Kumeyaay village of Pamo. Human remains were identified on site by Mooney and Associates and that project went forward with no Native participation on site leaving Tribes at a disadvantage as usual. I urge County DPR to consult with Tribes further and involve us in the design process to minimize impacts to our cultural resources. F-1 F-2 F-3

Thank you,

Clint Linton
Director of Cultural Resources
Iipay Nation of Santa Ysabel
760 803-5694

San Diego County Archaeological Society, Inc.

Environmental Review Committee

2 January 2012

To: Ms. Megan Hamilton
Department of Parks and Recreation
County of San Diego
5500 Overland Avenue, Suite 410
San Diego, California 92123

Subject: Draft Mitigated Negative Declaration
Ramona Grasslands Preserve

Dear :

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DMND and cultural resources report for the project, we have the following comments:

1. Cultural resources mitigation measures 4 and 5 in the DMND, as well as MM-4 and MM-5 in the cultural resources report, conflict. Measures 4 and MM-4 call for Native American monitoring of all ground-disturbing activity "where the resource is a prehistoric archaeological site". Measures 5 and MM-5, on the other hand, says that "Any ground disturbing activities on the Preserve must be considered as having the potential to encounter Native American human remains." Therefore, measures 4 and MM-4 should be revised to specify that Native American monitoring for all ground-disturbing activity, regardless of what site type is involved. G-1
2. The cultural resources report mentions, in several places, County Survey Road 97. Curiously, though, the Historic Period discussion in Section 1.2.2 of the report (pages 12-13) contains no mention of Survey Road 97. What information is in the section on travel routes through the Preserve is very vague, surprising considering the connection with the Battle of San Pasqual and the stage coach routes the preceded Survey Route 97. It should be expanded, as this is an important aspect for interpretation of the Preserve in the future. G-2
3. We support the establishment of the proposed archaeological district. We suggest that it also be brought to the County's Historic Site Board for historic landmarking. G-3
4. Section 4.2.2 of the cultural resources report discusses treatment of SDI-10270, which is described on page 23 as "a minor bedrock milling site". The site does need to be checked and appropriate treatment determined if SDI-10270 includes more than just bedrock milling. But if it is just a minor bedrock milling site, it is not particularly vulnerable to damage and consideration could be given to using it for interpretation. G-4

5. We noted a typographical error in the second paragraph under MM-2 in the cultural resource report and the corresponding portion of the DMND (page 11), where CA-SDI-10270 appears as "CA-SDI-1270". G-5

Thank you for including SDCAS in County Parks' environmental review process for this important project.

Sincerely,

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

cc: ICF International
SDCAS President
File

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

January 16, 2012

Megan Hamilton
County of San Diego
Department of Parks and Recreation
5500 Overland Avenue,
San Diego, CA 92123

Re: Draft MND, Ramona Grasslands Preserve, Public Access Plan, Resource Management Plan; Vegetation Management Plan

Dear Ms. Hamilton,

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the above referenced documents. EHL has been engaged in the land use planning, land acquisition, and overall conservation of the MSCP and Ramona grasslands for a number of years. We consider the Ramona grasslands one of the most important biological core and linkage areas in the MSCP and North County-MSCP. Over 400 plant and 200 animal species are found within the grasslands' complex. The area functions as a critical hub to a N/S/E/W MSCP reserve segment.

The conservation of the roughly 3,500 acres of the Ramona grasslands has been the result of the concerted effort of numerous conservation partners. Local non-profits and conservation activists were in the vanguard of establishing the conservation imperative for the grasslands over a decade ago. The bulk of the acquisition funding was provided by non-County federal and state sources for the expressed purpose of conservation of species and habitats under the NCCP.

Historically, the County of San Diego had three large grassland areas (western parcel of Otay Ranch, Ramona grasslands, Vista Irrigation district lands) that supported migratory and resident raptors and other grassland dependent species, each significantly, at different elevations. The loss of the western Otay Ranch to development has increased the regional functional value of the Ramona and Vista Irrigation grasslands significantly. Our comments will be framed by specific topic within the regional as well as local perspective, with particular focus on reserve function and sensitive species such as golden eagle.

Golden Eagle. The eagle is the iconic species of the Ramona Grasslands and—with mountain lion and big horned sheep—of San Diego County. As such, as a covered species under the MSCP, and with newly revised federal protection standards, it deserves special attention in the RMP. At the time of adoption of the MSCP, 14 golden eagle pair

8424-A SANTA MONICA BLVD., #592, LOS ANGELES, CA 90069-4267 ♦ WWW.EHLEAGUE.ORG ♦ PHONE 213.804.2750 ♦ FAX 323.654.1931

remained in the MSCP plan area (out of 44 pair in 1950's). The grasslands support one breeding pair of eagles, with two additional pairs utilizing the area for foraging. As a classic umbrella species, conservation planning around the eagle would cover a lot of ground with respect to numerous other biological considerations of the RMP: Edge effect, public use, restoration priorities and strategies, and reserve design function would all be qualitatively informed by such a species focus. Consequently, a revised document should relate in a clear narrative the following issues and regulations:

1. The MSCP covered species conservation standards (subregional MSCP/BO and County SAP/BMO/RPO) and the Golden Eagle Protection Act (GEPA) should be reconciled, we assume with concurrence of USFWS. This cross analysis with the GEPA would be perhaps the first in the San Diego NCCP region and would provide valuable guidance and perspective to regional conservation and MSCP integration for this species. (This would be an ideal agenda topic for the San Diego Management and Monitoring Program, which your department and DPLU participates in.) H-1
2. A specific finding that the grant agreement conservation obligations of the funding agencies for grasslands' acquisitions are met by the conservation requirements and outcomes of the RMP. H-2
3. An assessment of consistency with the MSCP 4,000' avoidance standard (which is a minimum). It appears that the proposed trail in the northwest quadrant is within that distance. Additionally, an analysis of cumulative impacts (direct and indirect) to foraging areas bisected by trails should be included for the resident nesting and also foraging eagles. H-3 H-4
4. An explanation of how the minimization measures indentified in the biotechnical report will be budgeted should be included in the revised document. Absent the funding, the worst-case scenario should be analyzed for consistency with MSCP and GEPA conservation standards. H-5
5. Biological monitoring and analysis of the nesting and foraging success of the eagles should be included in the annual report. H-6

Public Access Plan (PAP) Trails and other public use areas are potentially compatible but secondary planning objectives for the conserved lands. A revised RMP and PAP should analyze the following:

1. The RMP and PAP should include an analysis of how the trail impacts in the southwest quadrant are affecting the foraging requirements of raptors. As proposed, the trails system dramatically fragments this area. The effective loss of this area for raptor foraging implicates the proposed trails in the NW and NE quadrants. H-7
2. A clear explanation/description of how the proposed Preserve trails connect with off-site trails should be included. H-8
3. While it is a significant consideration, it should not be assumed that existing trails are located in the least sensitive areas simply because they pre-exist. An analysis of how each proposed trail meets the standard of "least sensitive area" should be included in the revised document. H-9

4. Wherever possible, trail widths should be single track. The exception should be the rule and explained in the PAP. H-10
5. Trails should be fenced where necessary to preclude 'volunteer' trail use. H-11

Monitoring:

1. Annual monitoring of the eagle nest site should be performed to ensure that the nest sites are not disturbed, reproductive success is assessed, and adaptive management strategies identified. H-12
2. Invasive plants should be mapped and monitored on an annual basis as a Preserve management priority. H-13
3. Monitor population fluctuations of MSCP covered species as a Priority 1 activity. H-14
4. Monitor restoration areas for success. H-15
5. The proposed five-year interval for habitat and species monitoring is too long a period for an effective trends analysis. This time interval is not adequate to track fluctuations in sensitive species populations, some of which can become extirpirtated from a locale within that timeframe. Once any particular implementation measure is begun, effectiveness monitoring generally has to occur on an annual basis. This is particularly true for sensitive or target species and invasive plant monitoring. For example, it generally takes multiple years of consistent work to eliminate invasive plants from a locale. Without a constant effort, a one step forward, two steps back result is not uncommon. Consequently, monitoring must be linked and timed to advise budgets and implementation for priority species. H-16
6. Monitor distribution of arroyo toads in the NW quadrant. H-17
7. Due to the regional significance of the grasslands, quarterly bird surveys should be an ongoing monitoring Priority 1 activity. H-18
8. Monitor distribution of SKR, particularly in the NE quadrant adjacent to the Montecito Ranch development H-19

Preserve Vegetation Management Plan (VMP)

1. Habitat Restoration: The VMP states that active restoration will occur only following changes to the existing native habitats. This standard would preclude restoration of historically but degraded natural assemblages. Please clarify. H-20
2. Please clarify which periods of the year cattle would be restricted from the Santa Maria creek corridor H-21
3. Please clarify the standard (50%?) for fuel management clearing for houses adjacent to the Preserve. H-22

Thank you for your consideration.

Michael Beck
San Diego Director

January 8, 2012

Megan Hamilton
Parks and Recreation
5500 Overland Avenue
Suite 410
San Diego, CA 92123

Dear Megan Hamilton

A "Notice of Intent to Adopt a Mitigated Negative Declaration" from the County of San Diego Department of Parks and Recreation dated November 17, 2011 was received by a few residents of Highland Hills Estates on or about November 21, 2011. The notice stated that written comments regarding the Draft MND must be received no later than December 16, 2011. That period has passed, but I was informed just last Thursday, January 5, 2012 that comments would be accepted through January 8, 2012. Friday evening, January 6, 2012 four other Highland Hills Estates property owners and I met. We all agree we do have several concerns and suggest that we met with Parks and Recreation in the very near future. I-1

I might point out that your notice seemed to be sent to only those Highland Hills residents owning property adjoining the Grasslands. Highland Hills Estates is a private gated community comprised of about 90 parcels and about 140 full time residents. As far as I can tell, less than 10% of them received Notices, and none were informed of the public review period extension. This project will affect every resident of the community. Two areas you should be especially concerned of are the impact of increased traffic on Rangeland Road and the security of Highland Hills property and residents by opening the Grasslands to the public. I-2

We have estimated that 300 to 400 vehicles travel to and from Highland Hills each day over Rangeland Road. You should be mindful that the infrastructure (gate, gate control equipment, paved turn-around, and landscaping) at the end of County Road Rangeland are all private property installed and maintained by residents of Highland Hills. I-3

I attended a meeting at Department of Parks and Recreation called by Director Brain Albright on January15, 2010. At that time I expressed my concern that detail plans for trails and other attractions had been announced before work had been done to secure the property by erecting fencing, installing signage and patrolling the property. This still is to be completed. Should a member of the public cross over to private property in Highland Hills and suffer injury due to a fall or other mishap, our property owners would be exposed to lawsuit. I-4

I have received a copy of Dave Bittner's, Wildlife Research Institute, Inc. letter addressed to you dated December 15, 2011 and agree with his assessment. The vast majority of the Grasslands were entrusted to the Nature Conservatory with the int ent it should remain a I-5

Wildlife Preserve and I fail to see how opening this area to the public will benefit wildlife. I-5 cont.

At this time, we request that the County:

1) Secure the area adjacent to Highland Hills with appropriate fencing, signage and maintenance in order to protect us from trespassers. I-6

2) Ensure that the public has notice that the turn-around and gate at the end of Rangeland Road is private property and not for public use. I-7

3) Work with us to keep property owners and residents past the end of Rangeland Road informed of plans and progress concerning development of Ramona Grasslands. I-8

We will:

1) Contact property owners and residents of Highland Hills informing them of what we know at this time and what we have done so far. We will also be recording their concerns. I-9

2) Work with you to make this project something we can all be proud of, but first we need to have more insight into what the County is planning and the County needs to listen to our concerns.

Thank you for your attention,
You can contact me at:

Robert Farnsworth
19791 Via Vista Grande
Ramona, CA 92065
760-787-5737
bobsue@sv-mail.com

cc:
Dave Bittner, Wildlife Research Institute
Patrick Dailey, 17787 Puerto Oro Lane
Chuck Gulotta, 19894 Via Vista Grande
Richard Hoss, 19346 Via Cuesta
James Vasek, 19982 Vista Del Otero

Mountain-Castro, Jenelle

From: rcampbel@wellsfargo.com
Sent: Wednesday, November 30, 2011 4:05 PM
To: Hamilton, Megan
Subject: Comments on Ramona Grasslands Preserve Project

Follow Up Flag: Follow up
Flag Status: Flagged

Megan,

The current trails at Ramona Grasslands are fantastic, great view and footing, but are just not long enough! Would sure like to spend more time out there and, as a Ramona resident, it just wonderful to have such a nice area to enjoy right in our back yard!

And the current staging area is very limited and gets pretty crowded for us horse trailer folk, compared to the proposed project.

I fully support the proposed project and look forward to being a frequent user. (Any idea when?)

J-1

Thanks,
Robin

Robin Campbell

Market Growth & Development Consultant
Regional Partnerships Team

Consumer Credit Solutions
MAC E2985-011
760-440-0637 (Office)| 858-395-7999 (Cell)

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Mountain-Castro, Jenelle

From: christine griffin [cgriffin1217@gmail.com]
Sent: Thursday, December 01, 2011 6:56 PM
To: Hamilton, Megan
Subject: Old Rodeo Grounds Project in Ramona

Hi Megan,

I just wanted to take a moment to write an email in support of this project. It will bring a wonderful recreation area to Ramona that is greatly needed. K-1

--
Thank You.

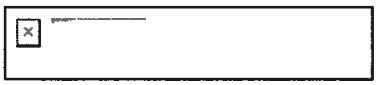
Christine Griffin
760-703-4860

Mountain-Castro, Jenelle

From: Ernest Smith [ernestoz@yahoo.com]
Sent: Friday, December 02, 2011 6:26 AM
To: Hamilton, Megan
Subject: Old Rodeo Grounds in Ramona

I support the Old Rodeo Grounds in Ramona becoming a trail head. It is important for rural communities to preserve there lifestyle and offer recreation for it's citizens. L-1

Ernie Smith
619-992-6511
Support Cuyamaca Equestrian Association
by using GoodScarch and GoodShop



Comment Letter M

Mountain-Castro, Jenelle

From: ginafrek@aol.com
Sent: Thursday, December 01, 2011 8:29 PM
To: Hamilton, Megan
Subject: Old Rodeo Grounds Project

Hi-Just wanted to let you know that I support the Old Rodeo Grounds project in Ramona. Always looking for new and beautiful trails. Thanks M-1

From: G Monegna [jendiva1997@gmail.com]
Sent: Sunday, December 04, 2011 9:36 AM
To: Boaz, Trish; Price, Jennifer; Hamilton, Megan
Subject: Ramona Grasslands - Pro

Good Morning,
I wanted to take the time to thank all of you for creating an amazing improvement plan for the Ramona Grasslands. Our community will benefit in so many ways and retaining and managing habitat in our area is very important. I applaud your efforts and appreciate your willingness to open it to the public. The staging area and arena will be a huge success just as the one in Holly Oaks is and I know many people that also appreciate your efforts.
I look forward to enjoying more of the Grassland Preserve and having it open for my children and grandchildren and furture generations.
Sincerely,
Gina Montegna

N-1

Comment Letter O

Mountain-Castro, Jenelle

From: Carlson, Karen [kcarlson@powayusd.com]
Sent: Wednesday, November 30, 2011 7:26 AM
To: Hamilton, Megan
Subject: Ramona Grasslands - public comment - Pro

Follow Up Flag: Follow up
Flag Status: Flagged

After reviewing documents and information related to the Ramona Grasslands,

I wanted to let you know how excited I am that the Ramona Grasslands project and proposed improvements encompasses so many wonderful things that are important for Ramona citizens. From trail users to youth groups, natural, cultural and biological resources to area management, this project is well thought out and I so appreciate all of your efforts! I am excited and waiting for the call to help to move this forward! O-1

Thank you to everyone that worked so hard and contributed so much to create an area in Ramona that is unique and well planned!

Karen Carlson
Del Norte High School
(858) 487-0877 ext 6142

Being yourself is being the person everyone else wants you to be

Mountain-Castro, Jenelle

From: Beth Edwards [edwrdsgrfx@aol.com]
Sent: Wednesday, November 30, 2011 12:30 PM
To: Hamilton, Megan
Subject: Ramona Grasslands Preserve Project – Mitigated Negative Declaration

Hello Megan Hamilton,

I believe open spaces are generally of great value to communities. Before I could comment in favor of this project, I want to express two concerns I have with the Grasslands area that are much more important to me and my family.

1) The ability to evacuate an entire community such as Ramona. This community is expected to grow considerably with the 20/20 plan and there are not adequate roads to evacuate our current population, as proven with the Witch Fire of 2007. This grasslands area is a prime connection area to three exits from Ramona (I-15 down Highland Valley Road, 78 down Bundy Canyon Road, and back over to Hwy 67 down either Highland Valley or Archie Moore roads). The approved housing increase in the general plan, along with projects such as Montecito Ranch, are going to add more congestion. I hope that a more-than-adequate bypass road (one that will work for the real future) is worked into the plans. Safety is the number one reason for government's existence, and this falls into that category. P-1

2) The ability for the Ramona Municipal Water District (RMWD) to expand their sprayfields to support the infrastructure of Ramona, now and into the future. Again, we currently cannot support our current level of population with the infrastructure we have. If we cannot get rid of the waste water, it is a very serious health issue. Watching birds and hawks is fine, trails are nice, but the health of a community is more important. Health and safety are the reasons we have government, and I don't feel this issue has been addressed to best benefit the people of Ramona. P-2

We need to think of health and safety first. Recreation is a minor part of the big picture. P-3

Sincerely,

Elizabeth Edwards

26502 Highway 78, Ramona, CA 92065

Mountain-Castro, Jenelle

From: Alison Farrin [Alison@ipsd.com]
Sent: Thursday, December 15, 2011 8:45 AM
To: Hamilton, Megan
Subject: Ramona Grasslands Preserve Project - Mitigated Negative Declaration

This is a wonderful project and I can't wait to see it happen! I am very happy to see that these public lands will soon be open to the public for use! Q-1

Alison A. Farrin, QPA, CPC
COO
14251 Danielson St.
Poway, Ca 92064
858-748-6500 x307
858-248-1849 Cell
858-748-0615 Fax

INNOVATIVE PENSION
Strategy & Design

Mountain-Castro, Jenelle

From: Lisa Whitebread [lisa@designworksflorals.com]
Sent: Thursday, December 01, 2011 6:28 PM
To: Hamilton, Megan
Subject: Ramona Grasslands
Attachments: email_logo.jpg; ATT2928780.txt

Hello,

I am so excited to be helping preserve this space and open it up for all to enjoy. I am committed to work parties for this and other projects in San Diego Co. R-1

Thanks!

Lisa Whitebread
lisa@designworksflorals.com
http://www.designworksflorals.com

Mountain-Castro, Jenelle

From: bigshire@cox.net
Sent: Friday, December 02, 2011 12:18 AM
To: Hamilton, Megan
Subject: Ramona Rodeo ground trail head

Please do anything and everything to keep this trail.. and expand it. There are too few places in Ramona to ride as it is! S-1

Karina Benish, RVT... San Diego Country Estates resident
760-443-6803

Mountain-Castro, Jenelle

From: Elfta Hilzman [redwolfranch@gmail.com]
Sent: Thursday, December 01, 2011 8:09 PM
To: Hamilton, Megan
Subject: Support the Old Rodeo Grounds Project in Ramona

Dear Megan,
As a citizen and avid horse person here in Ramona, I want to offer my support of the proposed project for the Old Rodeo Grounds.
I think it would be a valuable asset to the community to create a trail head and public arena at such a wonderful historical location here in Ramona...
I hope that you will support this project... It is a win/win situation for our community in every way !!! T-1

Thank you,
Elfta Hilzman
redwolfranch @gmail.com
--
Ride to Live ... Live to Ride.....

Please delete attached addresses before you forward to other people.

Comment Letter U

From: Albright, Brian
Sent: Friday, January 13, 2012 3:02 PM
To: Hamilton, Megan; Price, Jennifer; Boaz, Trish
Subject: Fw: Ramona Grasslands letter supporting non motorized use

Fyi

From: Deborah Schott [mailto:bigschottranch@hotmail.com]
Sent: Friday, January 13, 2012 02:48 PM
To: Albright, Brian
Subject: Ramona Grasslands letter supporting non motorized use

Dear Mr. Albright,
Please include this letter in **support of the Public having Access to Public Lands, at the Ramona Grasslands**. This is not just public land, it is **historic public land**, dating back to Roosevelt ! That's historic ! This area is centrally located to all in the Ramona community, access to this area will promote non motorized trail use. Opening this area will promote a **healthier lifestyle** many Americans are seeking, through Hiking and horseback riding . Our entire family supports the Ramona Grasslands project.
Feel free to email or call me regarding Ramona Grasslands
Sincerely,
Deborah Schott
760-443-0809
BigSchottRanch@hotmail.com

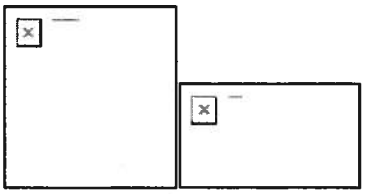
U-1

Deb Schott
Head Cowgirl
Big Schott Ranch

Comment Letter V

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:07 PM
To: Price, Jennifer; Hamilton, Megan; Vancio, Maryanne
Subject: FW: Ramona Grasslands

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:05 PM
To: Boaz, Trish
Subject: Fw: Ramona Grasslands

From: Fitz, Kathleen [mailto:KFitz@aspenms.com]
Sent: Friday, January 13, 2012 03:02 PM
To: Albright, Brian
Subject: Ramona Grasslands

Dear Mr. Albright,

Please do not close off the Ramona Grasslands to the public. It is a beautiful, secluded, non-motorized wilderness area that is very hard to come by. I have ridden my horses there and have hiked there several times and enjoy it fully. It is quiet, uplifting and easily accessible to those celebrating a healthy lifestyle or just wanting to appreciate a piece of heritage from President Roosevelt days. I have never witnessed any wildlife disturbances, in fact I think some of the hawks like to follow the horses for fun. V-1

Sincerely,
Kathleen Fitz
Ramona, CA

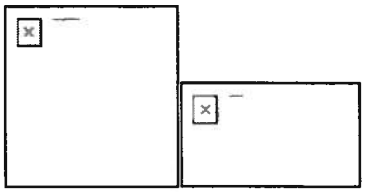
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Comment Letter W

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:07 PM
To: Price, Jennifer; Vancio, Maryanne; Hamilton, Megan
Subject: FW: Ramona Grasslands & trails PRO

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:04 PM
To: Boaz, Trish
Subject: Fw: Ramona Grasslands & trails PRO

I have a feeling more of these will come in now that Degenfelder is talking in the community. I will forward all to you and you can get them to staff.

From: Karen Carlson [mailto:slowlanejane@gmail.com]
Sent: Friday, January 13, 2012 02:57 PM
To: Albright, Brian
Subject: Ramona Grasslands & trails PRO

Dear Mr. Albright,
It is with utmost importance that the Ramona Grasslands have trails and is open for public access.

All too often public monies are used to purchase properties, then closed off to the public (think Dept of Fish and Game) and that is not right, nor fair.

In addition trails provide recreational opportunities, healthier lifestyles, are part of our heritage and provide a better understanding and appreciation for nature. One thing that is unique in the Grasslands is the gentle terrain making the trails - which have been ranch roads for hundreds of years and already have impacted the area to the extent that it will be - very usable for families and senior citizens! The trails in the Grasslands are planned to connect to the Santa Maria Creek Greenway, thus become part of that trail system, and that trail system runs right by our community center so when it is completed and usable the gentle trail leading into the Grasslands and beyond will be an incredible asset to the community of Ramona. If there are not trails in the Grasslands that will kill the future possibility

W-1

of so many connections in the Ramona Community Trails and Pathways Plan it would be extremely detrimental to the Master Trails Plan.

Trails also provide vital connections to surrounding communities and non-motorized traffic thus reducing pollution. Trails in the Grasslands will provide connections to surrounding communities as well as part of the Master Trails Plan.

W-1 cont.

The more open space that is available to the public lessens any impact at EVERY open space. It is easily evidenced and researched that if you have few open spaces and trails the impact will be greater, thus if you create and have more open spaces and trails the impact is lessened at ALL open spaces. The visits by the public will only enhance their knowledge, understanding and appreciation of the wildlife and plant life in the Grasslands area and Ramona and that knowledge, understanding and appreciation will garner respect for the biodiversity in the area.

It is vitally important for trails to be accesible in the Ramona Grasslands and I support the plan to have trails, staging areas, parking and arena use in place!

Karen Carlson
Ramona resident and trail enthusiast/supporter

Comment Letter X

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:23 PM
To: Hamilton, Megan; Vancio, Maryanne; Price, Jennifer
Subject: FW: Ramona Grasslands - Supporting the Status Quo

From: Albright, Brian
Sent: Friday, January 13, 2012 3:12 PM
To: Boaz, Trish
Subject: Fw: Ramona Grasslands - Supporting the Status Quo

From: Carl Gardner [mailto:cgardner619@gmail.com]
Sent: Friday, January 13, 2012 03:06 PM
To: Albright, Brian
Subject: Ramona Grasslands - Supporting the Status Quo

Hello,

I don't know the exact scope of your involvement in the Ramona Grasslands debate but I was told you are somehow involved.

I only recently discovered the Grasslands. I live in La Jolla and last week moved my equestrian training from Del Mar to a farm out by the grasslands. I chose this location over much more central Del Mar because of the proximity to the Grasslands.
Being originally from the bay area, I am accustomed to nice parks and rolling hills. Until visiting the Grasslands, I didn't know this existed in San Diego. X-1

I now employ several people in Ramona due to this move.

Not sure what the debate specifics are - something about birds I hear. I want to let you know I am in favor of keeping the lands open as multi-use public land.

If there is an email list for updates, please include me.

Cheers!

--
Carl Gardner

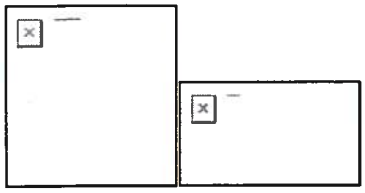
e: Cgardner619@gmail.com
m: 619.796.1476
LinkedIn profile

Comment Letter Y

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:29 PM
To: Hamilton, Megan; Price, Jennifer; Vancio, Maryanne
Subject: FW: Ramona Grasslands

Importance: High

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:13 PM
To: Boaz, Trish
Subject: Fw: Ramona Grasslands
Importance: High

From: Watson, Lori [mailto:Watson.Lori@scrippshealth.org]
Sent: Friday, January 13, 2012 03:11 PM
To: Albright, Brian
Subject: Ramona Grasslands

Hello, I am **in support** of the public non-motorized trails in the Ramona Grasslands because of my appreciation for the beauty of nature and the history of this open non developed space. Y-1

Thank you.

Lori Watson
Talent Manager, Recruitment
Scripps Health
9619 Chesapeake Drive #210
San Diego, CA 92123
858 435-7106 Office
858 531-2399 BB
858 435-7170 FAX
watson.lori@scrippshealth.org

http://www.scripps.org/careers

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From: Boaz, Trish
Sent: Friday, January 13, 2012 3:30 PM
To: Hamilton, Megan; Vancio, Maryanne; Price, Jennifer
Subject: FW: SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org

-----Original Message-----
From: Albright, Brian
Sent: Friday, January 13, 2012 3:14 PM
To: Boaz, Trish
Subject: Fw: SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

----- Original Message -----
From: meeshell2@juno.com [mailto:meeshell2@juno.com]
Sent: Friday, January 13, 2012 03:10 PM
To: Albright, Brian
Subject: SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Dear Sir,
Please don't block access to the trails on Ramona Grassland. We live near by and love the area. Its a great place for youth and adults to go and appreciate the area and learn to respect it also. There is not much to do in Ramona so to have access for exercise and peacefulness is key. Z-1
Thank you for your time.
Michelle Scott

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:30 PM
To: Vancio, Maryanne; Price, Jennifer; Hamilton, Megan
Subject: FW: Public comment on Ramona Grasslands

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org

-----Original Message-----
From: Albright, Brian
Sent: Friday, January 13, 2012 3:28 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Public comment on Ramona Grasslands

----- Original Message -----
From: lorettanielsen@cox.net [mailto:lorettanielsen@cox.net]
Sent: Friday, January 13, 2012 03:24 PM
To: Albright, Brian
Subject: Public comment on Ramona Grasslands

Dear Mr. Albright,
I am writing to voice my support for continued public access to the Ramona Grasslands. San Diego County has an extensive parks network that has proven the compatibility of non-motorized trail use by hikers/horseback riders and the preservation of endangered wildlife habitats.

Public access to public land has a long tradition dating back to President Theodore Roosevelt who first established the national park system. It promotes a healthy lifestyle in an era of increasing public obesity and offers countless educational opportunities for everyone who wants to learn about nature.

AA-1

--
Loretta Nielsen
516 Alice St
Ramona, CA

Comment Letter BB

From: Boaz, Trish
Sent: Friday, January 13, 2012 3:31 PM
To: Price, Jennifer; Hamilton, Megan; Vancio, Maryanne
Subject: FW: Keep the Grassland Preserve open for hikers and horseback riders!

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org

-----Original Message-----
From: Albright, Brian
Sent: Friday, January 13, 2012 3:29 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Keep the Grassland Preserve open for hikers and horseback riders!

----- Original Message -----
From: r6d@cox.net [mailto:r6d@cox.net]
Sent: Friday, January 13, 2012 03:25 PM
To: Albright, Brian
Subject: Keep the Grassland Preserve open for hikers and horseback riders!

Dear Mr. Albright,
I have lived in Ramona since 1994. Even though people consider Ramona as "country", there are really not very many places to hike or ride. Most are private lands, fenced off or a bit too strenuous for the over 50 crowd like myself. I really like this park as it is fairly level. I LOVE coming across people on horseback, too. Please keep the Ramona Grassland Preserve open. We just love it. We don't get to see lovely open pastures like this. This preserve makes Ramona very SPECIAL to us.
Thanks,

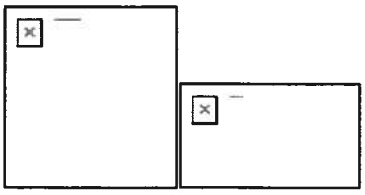
BB-1

Roxanne Davis
1230 Cook St.
Ramona, CA
92065

Comment Letter CC

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:09 PM
To: Vancio, Maryanne; Hamilton, Megan; Price, Jennifer
Subject: FW: Ramona Grassands

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
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www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:37 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grassands

From: Joan Powell [mailto:vettegramma@gmail.com]
Sent: Friday, January 13, 2012 03:35 PM
To: Albright, Brian
Subject: Ramona Grassands

I wish to present my feelings about the use of the Ramona Grasslands. I am a horse owner, in Ramona, and think we have so few places to ride....not bother anyone, where we can ride in peace and appreciate the atmosphere, the quiet, away from motorized vehicles, and just plain old "get away from the everyday fast pace." I feel, as a member of the Ramona Trails Assn., that we strive to keep everything clean and in good repair and as a resident for 40 years, I should be able to use our grasslands. Thank you for reading my thoughts on this matter. Joan Powell

CC-1

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:10 PM
To: Hamilton, Megan; Vancio, Maryanne; Price, Jennifer
Subject: FW: Support of Non-Motorized Trails in the Ramona Grasslands

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
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trish.boaz@sdcounty.ca.gov
www.sdparks.org

-----Original Message-----
From: Albright, Brian
Sent: Friday, January 13, 2012 3:38 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Support of Non-Motorized Trails in the Ramona Grasslands

----- Original Message -----
From: juliebernas@yahoo.com [mailto:juliebernas@yahoo.com]
Sent: Friday, January 13, 2012 03:37 PM
To: Albright, Brian
Subject: Support of Non-Motorized Trails in the Ramona Grasslands

Dear Mr. Albright,

I would like to express my support for public non- motorized trails in the Ramona grasslands. As a neighbor to the recently opened Ramona grassland trails I often hike, ride mountain bikes and trail ride our horse there. Living on the west end of Ramona there are no longer trails available for mountain biking and trail riding in our area. The grasslands are a beautiful place for my husband and I to enjoy nature along with our kids. DD-1

Many of my friends and neighbors also frequent the Ramona grassland trails. All of us make every effort to respect the birds and other animals native to the grasslands. It is my hope to one day take my grandchildren on a trail ride there.

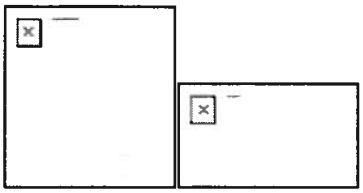
Thank you and a very happy 2012 to you.

Sincerely,
Julie Bernas

Comment Letter EE

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:11 PM
To: Vancio, Maryanne; Price, Jennifer; Hamilton, Megan
Subject: FW: trails on Ramona grasslands!

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:47 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: trails on Ramona grasslands!

From: Jill Bacorn [mailto:jillbacorn@hotmail.com]
Sent: Friday, January 13, 2012 03:45 PM
To: Albright, Brian
Subject: trails on Ramona grasslands!

Please list my support of public trails on Ramona Grasslands.
1. The public needs access to public land as part of our American Heritage dating back to Pres. Theodore Roosevelt.
2. My family and I appreciation of the beauty of nature and special habitats seen only in Ramona Grasslands. We look forward to many years of opportunity to spend quality time with children and grand-children while enjoy a natural setting.
3. We appreciate any time and place to participate in a healthy lifestyle provided by non-motorized trails, especially in Ramona and on the grasslands.

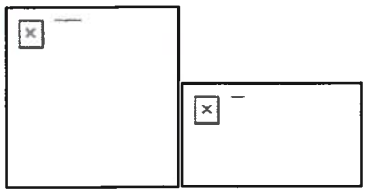
EE-1

Sincerely, Jill Bacorn

Comment Letter FF

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:11 PM
To: Hamilton, Megan; Price, Jennifer; Vancio, Maryanne
Subject: FW: Ramona Grasslands

Trish Boaz, Chief
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www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:54 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Wes Brustad [mailto:wesbrustad@yahoo.com]
Sent: Friday, January 13, 2012 03:47 PM
To: Albright, Brian
Subject: Ramona Grasslands

Dear Mr. Albright,

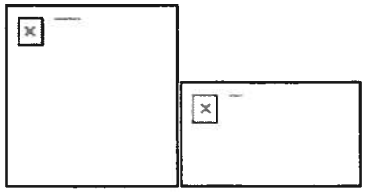
I am writing to support the non-motorized restriction to the Ramona Grasslands. This wonderful area should be limited to hikers and equestrians. The last thing we need on the trails are motorbikes and motorcycles let alone other vehicles. This area is known for its serenity that should be enjoyed by those who love the outdoors and who do not disturb the natural wildlife. Horseback riders do not disturb nesting birds, and therefore should be encouraged to use these trails. We respect our wildlife and are always careful to leave nature well enough alone when out enjoying its beauty. FF-1

Wes and Karla Brustad
16237 Arena Place, Ramona, CA 92065

Comment Letter GG

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:12 PM
To: Vancio, Maryanne; Hamilton, Megan; Price, Jennifer
Subject: FW: GRASSLAND TRAILS

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:54 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: GRASSLAND TRAILS

From: Dennis Sargent [mailto:dandesargent@yahoo.com]
Sent: Friday, January 13, 2012 03:53 PM
To: Albright, Brian
Subject: GRASSLAND TRAILS

WE SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

PLEASE DO NOT CHANGE THE WAY OUR TRAILS ARE WORKING. WE DO NOT NEED ANY CHANGES IN OUR TRAILS. GG-1

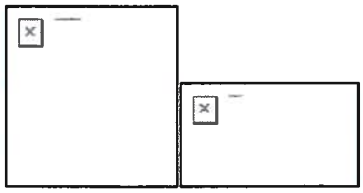
THANK YOU.

DENNIS AND ELLEN SARGENT

Comment Letter HH

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:12 PM
To: Vancio, Maryanne; Price, Jennifer; Hamilton, Megan
Subject: FW: PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
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San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 3:55 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

From: Carlson, Terry F (US SSA) [mailto:terry.carlson@baesystems.com]
Sent: Friday, January 13, 2012 03:53 PM
To: Albright, Brian
Subject: PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Dear Sir,
The RAMONA GRASSLANDS are no doubt a natural resource we need to preserve and protect. This being said, the ability for the public to access and enjoy the natural beauty responsibly is right that needs to be preserved and protected. Non-motorized access (hiking and horse trails) is a responsible use of this resource. It is my understanding the trail is more than a mile from the nesting birds. It also my understanding there are cattle that graze on the grasslands. If this is true what harm would it be to allow horses on the trail. HH-1

The trail(s) are an opportunity for all to enjoy the natural places in the Ramona area. It is also a place to take our children and grandchildren to teach them about nature and why it should be protected and it can be enjoyed responsibly.

It is for these reasons I urge parties responsible for the decisions of how to best use this natural asset to support its use for non-motorized access. HH-1 cont.

Regards,

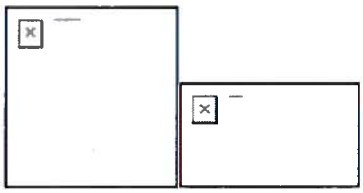
Terry F. Carlson, CFM
18980 Woodson Court, Ramona, CA 92065

Telephone: (858) 675-2699
Cell: (858) 442-0009
email: terry.carlson@baesystems.com
FAX: (858) 675-2700

Comment Letter II

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:13 PM
To: Hamilton, Megan; Vancio, Maryanne; Price, Jennifer
Subject: FW: Ramona Grasslands Trails Advocate

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 4:07 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands Trails Advocate

From: Meg Hylton [mailto:meg.hylton@gmail.com]
Sent: Friday, January 13, 2012 03:59 PM
To: Albright, Brian
Subject: Ramona Grasslands Trails Advocate

Mr. Albright,

Please consider adding more trails in support of public non-motorized trails in the Ramona Grasslands.

I am an avid horseback rider and trail user. I am also a nature lover. The two can coexist without any environmental harm. I have witnessed it. I have seen many wild creatures on my rides on public trails such as hawks, turkeys, deer, and rattlesnakes. We share the wonderful open spaces and respect each others right to it. I have met many different people on my rides including avid bird watchers and photographers that without the trail would not have access to lesser traveled areas for their enjoyment. II-1

Trails are important to our lifestyle here in SoCal. Hiking, biking and horsebacking riding on trails in our county is one of the major attractions to living and playing in SoCal. We use the trails to get exercise, relieve stress and get some time with our best friends. Ramona is one of these great places that offers various opportunities for more trails.

Isn't it all about finding a balance between public access to open space and maintaining our environment? Just take a look at the beautiful Welcome to Ramona sign on the corner of HWY 67 and Highland Valley Road. It speaks for all of us. We can coexist.

II-1 cont.

Please approve additional trails as a part of the Ramona Grasslands project.

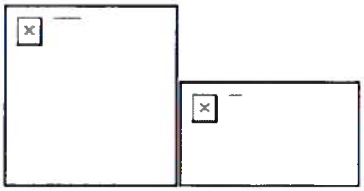
Very respectively,

Meg Hylton
16380 Ellie Lane
Poway CA 92064
858-679-8888

Comment Letter JJ

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:14 PM
To: Price, Jennifer; Hamilton, Megan; Vancio, Maryanne
Subject: FW: Public Non-Motorized Use of Ramona Grasslands

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 4:13 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Public Non-Motorized Use of Ramona Grasslands

From: Roberta and Robert Carr [mailto:rcarr2@cox.net]
Sent: Friday, January 13, 2012 04:11 PM
To: Albright, Brian
Subject: Public Non-Motorized Use of Ramona Grasslands

I'm Roberta Carr, from Poway. I'm a Volunteer Trail Patroller with the County Parks, and I patrol mostly equestrian. Additionally, I am a licensed Wildlife Rehabilitator with Project Wildlife, specializing in Songbirds.

I just received an email asking me to email you in order to express my support to keep the Ramona Grasslands trails open. JJ-1

So, here I am.

Keep them open. It's a unique habitat that is an absolute joy to experience. There is nothing else like it in the county. Whether I'm on a County Parks patrol or on a lovely trail ride, the Grasslands provide me an opportunity to experience a little bit of what it must have been like to ride a horse in the West before civilization.

It's a jewel of a park, and should remain open for us to experience.

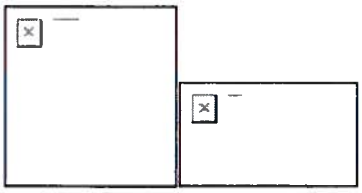
JJ-1
cont.

Roberta Carr

Comment Letter KK

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:28 PM
To: Vancio, Maryanne; Hamilton, Megan; Price, Jennifer
Subject: FW: Ramona Grasslands and the need to keep it accessible to non-motorized activity

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
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5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 4:24 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands and the need to keep it accessible to non-motorized activity

---

From: Robin Joy Maxson [mailto:robinjoymaxson@gmail.com]
Sent: Friday, January 13, 2012 04:21 PM
To: Albright, Brian
Subject: Ramona Grasslands and the need to keep it accessible to non-motorized activity

Good afternoon Brian,
I have lived in this area all of my life - since 1964. The lifestyle afforded San Diego County residents is special and unique. The Ramona Grasslands is a classic example of the past, present and future - contained in one protected location. The ability to view the native American people's history, to walk and ride through the grasslands as they must have appeared in the past is paramount to providing educational and recreational opportunities to San Diego families. By way of designated trails - use of the Ramona Grasslands is contained while allowing the public the benefit of this open space. KK-1
The Ramona Grasslands must remain an accessible treasure to the citizens of San Diego County and not something to view from afar.
Thank you very much.
-Robin Joy Maxson
Resident of Ramona
Vice President, Ramona Trails Association

From: Albright, Brian
Sent: Saturday, January 14, 2012 6:40 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands Trail Plan - In Favor

----- Original Message -----
From: erna.adelson@sv-mail.com [mailto:erna.adelson@sv-mail.com]
Sent: Saturday, January 14, 2012 06:33 PM
To: Albright, Brian
Subject: Ramona Grasslands Trail Plan - In Favor

Hello Mr. Albright:

I am a Ramona resident who's house is in Highland Hills which almost surrounded by the Grasslands Preserve. I have always hoped that there would be access to the Grasslands for hikers, mountain bikers, and equestrians. The new staging area on Highland Valley Road is a great beginning and it is very exciting that an additional set of trails is proposed, especially connector trails.

The Grasslands should be open to respectful use that promotes outdoor activites for health. In addition, the best way to continue to have such wonderful places is if people can actually experience them. LL-1

The Grasslands currently have cattle on them and there are regular activities by the cowboys as well as the water district on the Grasslands. Use of existing ranch roads for hiking and horseback riding are very much in keeping with what already occurs there.

These Grasslands have been used by people from the Native Americans to the present and they should continue to be open -- as public lands -- to the public for uses consistent with heritage.

I am very much in favor of the proposed trails in Davis-Eagle (North East) and Gildred (North West) sections and the overall trail plan.

Best Regards,

Erna P. Adelson
19503 Vista del Otero
Ramona, CA 92065

Comment Letter MM

From: Albright, Brian
Sent: Saturday, January 14, 2012 3:07 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands!

From: Dawn Rockwell [mailto:rockydawn24@gmail.com]
Sent: Saturday, January 14, 2012 02:09 PM
To: Albright, Brian
Subject: Ramona Grasslands!

Mr Albright, I moved to Ramona in 1968 because it gave me lots of trails to ride on. Now times have changed. The trails are disappearing. It is unsafe to ride on the road. We need more trails not less. The Grasslands already has trails on it that can be put to good use. What good is this land if not to be used and enjoyed? Or would you rather it go up in smoke. Like Yellow Stone? I am very sad that there are groups out there that want to spoil it for those of us who love and enjoy the outdoors. MM-1

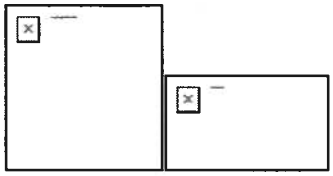
WE NEED MORE TRAILS!!!

Thank You, Dawn Rockwell

Comment Letter NN

From: Boaz, Trish
Sent: Friday, January 13, 2012 4:12 PM
To: Hamilton, Megan; Vancio, Maryanne; Price, Jennifer
Subject: FW: Please keep San Diego's open space available to us.

Trish Boaz, Chief
County of San Diego
Department of Parks and Recreation
Resource Management Division
5500 Overland Avenue, Suite 410
San Diego, CA 92123
(858) 966-1370
trish.boaz@sdcounty.ca.gov
www.sdparks.org



From: Albright, Brian
Sent: Friday, January 13, 2012 4:06 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Please keep San Diego's open space available to us.

From: dross.ddc@gmail.com [mailto:dross.ddc@gmail.com]
Sent: Friday, January 13, 2012 03:57 PM
To: Albright, Brian
Subject: Please keep San Diego's open space available to us.

Mr. Albright,

It is my understanding that you are an advocate for the people to have access to open space in our county. Thank you for all your efforts in providing the support we desperately need to have open space available to us to bring our children, family and friends out into the wondrous wild life and open space in areas such as the Grasslands in Ramona. I enjoy the open space with my family and friends... friends from our area and visitors from abroad. It is a major point of pride for me to show off how much San Diego cares about opening up these beautiful areas to the public, and helps me highlight what a wonderful place San Diego is to live in; and to visit... for those of us not fortunate enough to live here (yet). NN-1

Again, thank you for your effort. I hope that I will be able to expand the enjoyment of the Grasslands that my friends, family and I experience on a weekly basis.

Very Respectfully,

David Ross

1244 Cedar Street
Ramona, CA 92056

Comment Letter OO

From: Albright, Brian
Sent: Saturday, January 14, 2012 1:39 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Support for non motorized public trail in Ramona Grassland

---

From: Jeff Dorsett [mailto:mqi1469@motorola.com]
Sent: Saturday, January 14, 2012 01:25 PM
To: Albright, Brian
Subject: Support for non motorized public trail in Ramona Grassland

Brian,

Our family supports public non-motorized access to the Ramona Grasslands. We urge the San Diego government to preserve and protect this open space and work to ensure this property is made accessible to the public for many years to come. OO-1

One of the reasons our family moved to Ramona, was because of the beautiful open space and access to the local hiking trails.

Thank you,

Jeff & Terry Dorsett
Ramona, CA

Comment Letter PP

From: Albright, Brian
Sent: Saturday, January 14, 2012 1:39 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grassland Trils

----- Original Message -----
From: James R Oster [mailto:jroslo@cox.net]
Sent: Saturday, January 14, 2012 01:19 PM
To: Albright, Brian
Cc: James R Oster <jroslo@cox.net>
Subject: Ramona Grassland Trils

1/14/12

Dear Mr. Albright,

Sharon and I agree completely and strongly with our exemplary HORCI (homeowners) president, George Eastwood, who today sent you the message copied below:

"The citizens of Ramona have fought long and hard to preserve and enjoy the Ramona Grasslands. I expressly want to urged San Diego County government to ensure that the Ramona Grasslands are not only preserved to better protect our local wildlife and open spaces but that these Grasslands are made accessible to our children and the general public using well marked non-motorized public trails. Our tax dollars should be used to maximize compatible uses of our natural resources for the public good." We have hiked on the trails and find them splendid. It will be a tragedy if they are not kept open for public use!

PP-1

Thank you.

Jim and Sharon
2834 Shadow Oak Ct
Ramona, CA 92065

Comment Letter QQ

From: Albright, Brian
Sent: Saturday, January 14, 2012 1:04 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Access to Ramona Grasslands and other grassland areas

---

From: Terri Halverson [mailto:terri.halverson@yahoo.com]
Sent: Saturday, January 14, 2012 12:52 PM
To: Albright, Brian
Subject: Access to Ramona Grasslands and other grassland areas

I am writing to request continued access to open rangeland and wildlife areas by horse people. I have ridden these areas and ranches in San Diego County for over 40 years. I am also a wildlife rehabilitator and an animal rescuer since 1978, so I am acutely aware of what disturbs and doesn't disturb wildlife. The usual horse back rider is quiet and respectful off all animals and land. I would put in a provision that raucous riders can be sited and removed and forbidden further access, because such people do exist once in a while, but please don't cut off use of these lands to the horse people that are being denied riding trails all too often now. Thank you for your consideration. Terri Halverson

QQ-1

Comment Letter RR

From: Albright, Brian
Sent: Saturday, January 14, 2012 11:42 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Jo Ann Sudul [mailto:joannsudul@yahoo.com]
Sent: Saturday, January 14, 2012 09:19 AM
To: Albright, Brian
Subject: Ramona Grasslands

I am very concerned about the potential closure of Ramona Grasslands to non-motorized access. I am currently in the process of buying a home in Ramona and the Grasslands access is one of the reasons I chose Ramona. I have been a long-time trail rider and hiker and believe the majority of equestrians and hikers respect the wild life and trail rules. Ramona needs more family-based recreation and the closure would be a great loss to the community. RR-1

Please help keep the Grasslands a wonderful place to walk and ride. Thank you.

Sincerely,

Jo Ann Sudul
17744 Villamoura Dr.
Poway, CA 92064
858-521-8040
joannsudul@yahoo.com

Comment Letter SS

From: Albright, Brian
Sent: Saturday, January 14, 2012 11:42 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Support for non motorized public trail in Ramona Grassland

---

From: George Eastwood [mailto:gheastwood@cox.net]
Sent: Saturday, January 14, 2012 11:17 AM
To: Albright, Brian
Subject: Support for non motorized public trail in Ramona Grassland

Brian,

The citizens of Ramona have fought long and hard to preserve and enjoy the Ramona Grasslands. I expressly want to urged San Diego County government to ensure that the Ramona Grasslands are not only preserved to better protect our local wildlife and open spaces but that these Grasslands are made accessible to our children and the general public using well marked non-motorized public trails. Our tax dollars should be used to maximize compatible uses of our natural resources for the public good. SS-1

Thank you.

George Eastwood
2451 Southern Oak Road
Ramona , CA 92065

Comment Letter TT

From: Albright, Brian
Sent: Saturday, January 14, 2012 11:41 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: support for public access to Ramona Grasslands

From: Jolinda Marshall [mailto:jolinda.morluv@gmail.com]
Sent: Saturday, January 14, 2012 11:26 AM
To: Albright, Brian
Subject: re: support for public access to Ramona Grasslands

Hello,
I am writing to show my support for public access to the Ramona Grasslands using non motorized public trails. I am very grateful for anything you can do to help keep this beautiful space open for public use and enjoyment. TT-1

Thank you,

Jolinda Marshall
Let Peace begin with ME!

(619) 246-3532

Comment Letter UU

From: Albright, Brian
Sent: Saturday, January 14, 2012 5:13 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Robert J. Wallace [mailto:Wallace_Robert_J@solarturbines.com]
Sent: Saturday, January 14, 2012 02:53 AM
To: Albright, Brian
Subject: Ramona Grasslands

I would like to express my views on the issue of putting trails in the Ramona Grasslands. I have my personal reasons for wanting the trails there, such as hiking for fitness and appreciating the beauty of nature. But for me, personally, I am more concerned about my role as a leader of youth. Trails of these types not only allow me to appreciate nature, but allow me to teach that appreciation to the youth I work with. I believe that such trails allow me to show the youth the diversity that exists nature, particularly in San Diego County, and helps me teach them to appreciate that diversity. I think that if we don't go through with the trails as planned, we will have missed an opportunity to pass along our appreciation of the beauty of nature in San Diego to our rising generations. UU-1

Thank you for your kind attention.

Best regards, saludos, amitiés, und so weiter.

Rob Wallace
Solar Turbines Incorporated
Taurus 70 Product Support Manager
Phone: 858 694 6738 Cell: 760 419 0337 Fax: 858 694 6089
E-mail: rob_wallace@solarturbines.com

Comment Letter VV

From: Albright, Brian
Sent: Saturday, January 14, 2012 5:13 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Grasslands

----- Original Message -----
From: Jacque Powell [mailto:flyballterv@yahoo.com]
Sent: Saturday, January 14, 2012 12:25 AM
To: Albright, Brian
Subject: Grasslands

Brian I have taken my horse on the trials and I've also have hike out there. It's a very beautiful place and I have enjoyed it very much VV-1
Thank You, Jacque Powell
Sent from my iPhone

Comment Letter WW

From: Albright, Brian
Sent: Saturday, January 14, 2012 5:12 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: vmranch@sky valley [mailto:vmranch@sv-mail.com]
Sent: Saturday, January 14, 2012 12:08 AM
To: Albright, Brian
Subject: Ramona Grasslands

Brian,

I have been a resident of Ramona since 1992 and a horse-owner most of my life. I waited with great anticipation for the Ramona Grasslands to open and I take my horse there to enjoy the beauty of nature and the beauty of the Grasslands every chance I get. Please keep the Ramona Grasslands open for non-motorized trails for hiking and riding as shown during the public workshops. This is a place for all of Ramona to enjoy, get out in nature with their families, hike, get healthy, breathe the fresh air, view the wildflowers in the spring, etc., all without having to drive a long distance to the mountains, etc. We can enjoy public access to public land right in our own backyard and get away from the stressors of life for awhile. WW-1

Respectfully, Melanie S. - Ramona

I am using the Free version of SPAMfighter.
SPAMfighter has removed 78596 of my spam emails to date.

Do you have a slow PC? Try free scan!

Comment Letter XX

From: Albright, Brian
Sent: Saturday, January 14, 2012 5:12 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Lisa Whitebread [mailto:lisa@designworksflorals.com]
Sent: Friday, January 13, 2012 11:02 PM
To: Albright, Brian
Subject: Ramona Grasslands

Sir,

Please don't let this opportunity slip away---we need to conserve this area for our families to enjoy, for our healthy lifestyles, to appreciate our American heritage and the beauty therein.

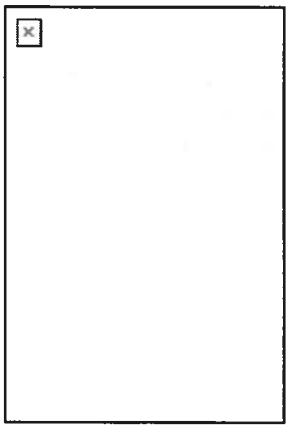
XX-1

My extended family and I enjoy hiking, horseback riding, bicycle riding and all non-motorized activities available in these grasslands.

It IS PUBLIC land after all---we need access to it.

Thank you,

Lisa Whitebread
lisa@designworksflorals.com
http://www.designworksflorals.com



Comment Letter YY

From: Albright, Brian
Sent: Saturday, January 14, 2012 5:12 AM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Keep Ramona Grasslands Public

From: Stacy Adelman [mailto:sahorses@yahoo.com]
Sent: Friday, January 13, 2012 10:48 PM
To: Albright, Brian
Subject: Keep Ramona Grasslands Public

January 13, 2012

Mr. Albright,

Please keep the Ramona Grasslands Parks and Recreation trails open to the public.

My name is Stacy Adelman and I live across the street from the Ramona Grasslands. My family and I have lived here for 12 years and have enjoyed the open space and beautiful scenery. One of the things we really enjoy is walking around on the trails and enjoying the wildlife and nature that this area has to offer. The cows grazing in the 100's of acres of grass, trees and streams is very peaceful, and sometimes funny to watch. I ride horses and the new Grasslands trails off Highland Valley Rd are great fun. I ride there at least once a week. The people I have run across on the trails are very nature and wildlife friendly. I've never seen wild or loud groups playing around. The people seem to be there, as am I, to enjoy the natural beauty and serenity of the land and the wildflowers and bushes and trees that are original to this area. I have never seen any trash; paper, cans, bottles, wrappers, cigarettes butts, etc on or around the trails. YY-1

Myself and many others would be very disappointed if the public access was taken away from the Ramona Grasslands. People enjoy it and are taking care of it. As far as the environmental impact on the area, if the cows don't bother the wildlife and ground grasses and plants then neither do the horses. The nesting sites and hawk watch is on the other end of the Grasslands space so they are not being affected by the public trails either.

Mr. Albright, please reconsider your stand on not letting the PUBLIC use the PUBLIC LAND at the Ramona Grasslands.

A concerned Ramona resident,

Stacy Adelman
sahorses@yahoo.com

Comment Letter ZZ

From: Albright, Brian
Sent: Friday, January 13, 2012 10:29 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Susan DePriest [mailto:susandepriest@gmail.com]
Sent: Friday, January 13, 2012 10:21 PM
To: Albright, Brian
Subject: Ramona Grasslands

Dear Mr. Albright:

I am writing to tell you how much we, the public, LOVE the availability of the Ramona Grasslands to the hikers, bikers and equestrians. It is a beautiful open space so typical of Ramona. Please do everything you can to keep it open to us. Everyone I know who uses the trail is a tax paying individual. We're not opposed to paying a yearly fee to use the trails. We just want to keep using them! ZZ-1

Thank you so much!

--
Susan DePriest, Paralegal
Law Office of James M. Provencher
5190 Governor Drive #208
San Diego CA 92122
858-552-2590 Fax: 858-453-1799

Comment Letter a

From: Albright, Brian
Sent: Friday, January 13, 2012 9:12 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: Jacque Sherman [mailto:gjsherman@tmwireless.com]
Sent: Friday, January 13, 2012 09:08 PM
To: Albright, Brian
Subject: Ramona Grasslands

Hello Brian,

Could you please put up a good fight and win to keep public access in the Ramona Grasslands.

The government continues to infringe upon our right and access to public lands. This is part of our American Heritage and promotes a healthy lifestyle and an appreciation of the beauty of nature. We have been able to enjoy this area and do not want access denied to future generations. Please help America to continue to have public access to public lands and keep the Ramona Grasslands open.

a-1

Thank you,

Jacque Sherman
760-522-0304

Comment Letter b

From: Albright, Brian
Sent: Friday, January 13, 2012 9:12 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Fwd: ramona grasslands

From: ramonacowgirl@aol.com [mailto:ramonacowgirl@aol.com]
Sent: Friday, January 13, 2012 09:02 PM
To: Albright, Brian
Subject: Fwd: ramona grasslands

January 13, 2012

Mr. Brian Albright
Director of San Diego County Parks and Rec.

Dear Mr. Albright,

I live within riding distance from the Ramona Grasslands. I can't tell you how wonderful it is to be able to ride my horse there. He loves it, too. No cars or motorcycles to deal with!!
Even when I can't ride, it's such a pleasure when I drive by to see hikers or riders with their horses over there. Because I know how much joy all of the natural beauty in the grasslands is bringing to their lives.

My girlfriends and I also walk there, usually on Wednesdays. It's wonderful to see all of the wildlife. Whenever you run into people, everyone is so friendly and happy to be there. It's so peaceful and has such breathtaking scenery.

b-1

I had thought since it opened that everything was going to be fine with everyone and that it was all settled. Until this afternoon, I thought that the Wildlife Research Institute were friends and supporters of the Grasslands being open to the public.
What a disappointment it is to hear that someone is still trying to take away such a beautiful life experience from all of the people who are enjoying it so much. Shame on them.

Thank you.

Becky Cullen
17029 Handlebar Road
Ramona, CA 92065
760-787-0779

Comment Letter c

From: Albright, Brian
Sent: Friday, January 13, 2012 6:56 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Public Comment on Ramona Grasslands

From: christine griffin [mailto:cgriffin1217@gmail.com]
Sent: Friday, January 13, 2012 06:38 PM
To: Albright, Brian
Subject: Public Comment on Ramona Grasslands

Dear Mr. Albright,

We have been using the Grasslands park once a week since it opened. I have both hiked and ridden my horse there and enjoy it very much. It is the closest place to our home and our friends from out of town meet us there so we can enjoy the park together. I have always noticed people being respect full of the trails (staying on them) and any of the wild life or cows we see. I am looking forward to the day it gets larger and attaches to the Old Rodeo grounds too. c-1

It would be awful if it was closed or limited in any fashion.

Respectfully,

Christine Griffin
760-703-4860
Ramona Resident

Comment Letter d

From: Albright, Brian
Sent: Friday, January 13, 2012 6:55 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona grassland non-motorized trails

----- Original Message -----
From: Rose [mailto:hoss2angel@yahoo.com]
Sent: Friday, January 13, 2012 06:34 PM
To: Albright, Brian
Subject: Ramona grassland non-motorized trails

I hope that you can keep the Ramona grassland trail open for all of us hikers, and riders for now and for the future. I enjoy and would like to continue to enjoy for the long term the trails we have. Thank you for listening and hearing our voices. d-1
Sincerely,
Patricia Swart

Comment Letter e

From: Albright, Brian
Sent: Friday, January 13, 2012 6:55 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Save the Ramona Grasslands Preserve- Keep public lands public!

From: Camryn Burton [mailto:cburton.1897@gmail.com]
Sent: Friday, January 13, 2012 06:33 PM
To: Albright, Brian
Subject: Save the Ramona Grasslands Preserve- Keep public lands public!

January 13th, 2012

Dear Brian Albright,

I am writing to you in concern of the Ramona Grassland Preserve. If the County of Parks and Recreation closed the Preserve to the public, I and the rest of Ramona would be very upset. I am currently a homeschooled student in High School and spend my free time going on trail rides, bird watching and studying with my book of birds, and working out. I can't believe that anyone would want to limit this area to the public. No animals are disturbed by humans or horses. Everyone I know in Ramona will support keeping the Grasslands open. It's not every day that you can see cows grazing with their young, coyotes hunting, and birds of prey soaring over the sky. I have met people coming as far as Los Angeles for the natural scenery they had heard about. These trails are a great way to work out, ride horses, and spend time with your family. There are toddlers, kids, teens, adults, elders and pets that enjoy coming out here. I know Boy and Girl Scouts from all over Southern California come here to nature watch. My friends from downtown even haul their horses up a few times a month because there is no other place in San Diego quite like it. Why would anyone want to shut down this wonderful place to the public? If you do close it, why don't you take the Pledge of Allegiance and Flags out of our public schools? The Ramona Grassland Preserve is no less American. e-1

Thank you for your consideration,

Camryn Burton; Nature and Animal lover and Constant Visitor of the Grasslands

Comment Letter f

From: Albright, Brian
Sent: Friday, January 13, 2012 6:25 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: julieharski@aol.com [mailto:julieharski@aol.com]
Sent: Friday, January 13, 2012 06:22 PM
To: Albright, Brian
Subject: Ramona Grasslands

Brian Albright, Dir. of S.D. Cnty Parks/Rec,

I am writing to you to let you know that I and my family want non-motorized trails for hiking and riding in the Ramona Grasslands. Public access to public land is part of our American Heritage. Our whole family believes in living a healthy lifestyle which involves movement outdoors where we can appreciation of the beauty of nature. My husband, four grown boys, their wives and their children and I appreciate the opportunity of spending quality time together in the Ramona Grasslands. f-1

Thank you,
Julie Harski
15916 Mussey Grade Rd
Ramona, Ca 92065

Comment Letter g

From: Albright, Brian
Sent: Friday, January 13, 2012 5:57 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: IN SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

From: Bob Chisholm [mailto:chiz_home@yahoo.com]
Sent: Friday, January 13, 2012 05:47 PM
To: Albright, Brian
Subject: IN SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Dear Mr. Albright,

Public access to public land is a part of our American Heritage dating back (I believe) to President Theodore Roosevelt.

As a Boy Scout Leader, I have first hand experinced how this access develops stronger citizehship and a deeper respect and appreciation in both our youth and adults for the care of public lands and the nature-wildlife that resides there. It also promotes a healthy lifestyle, both physically and spritually. Myself and many in our community spend quality time with our families walking the trails of the Ramona Grasslands. g-1

I was disappointed to hear of an upcoming review on the public access of the Ramona Grasslands. Myself and many of my neighbors would not be in favor of this. g-2

As far as any question of disturbing sensitive nesting birds, the current trail is not in close proximity of nesting birds. And the equestrian use of the trails do not disturb the wildlife any more than the grazing cattle. g-3

Public lands should always remain public----and accessible----to the public and not a select few. g-4

Sincerely,

Bob Chisholm

District Committee Chairman for the

Pacific Crest District

San Diego Imperial County Council

Boy Scouts of America

23524 Carmena Road (residence)

Ramona, CA 92065

Comment Letter h

From: Albright, Brian
Sent: Friday, January 13, 2012 5:33 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: ramona grassland SDCE

----- Original Message -----
From: Georges DB [mailto:georges.deboelpaep@gmail.com]
Sent: Friday, January 13, 2012 05:29 PM
To: Albright, Brian
Subject: ramona grassland SDCE

Dear Brian.A ,
Please find our address in SDCE to send us info. h-1

Georges and Alejandra DeBoelpaep
16229 WIKIUP rd
Ramona CA 91910

Thanks, Georges DeBoelpaep

Comment Letter i

From: Albright, Brian
Sent: Friday, January 13, 2012 4:53 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: Ramona Grasslands

From: maria biondo [mailto:mbiondolongton@yahoo.com]
Sent: Friday, January 13, 2012 04:52 PM
To: Albright, Brian
Subject: Ramona Grasslands

Oh Brian, I do the volunteer trail patrol and the Grasslands often because it is so beautiful there. I have NEVER been there when there wasn't several cars in the parking lot, and people enjoying the beauty of this unique area. Often there are strollers and children with families on bikes of all sizes. They sit at the picnic tables and glory in the outdoors. Please fight to keep this area open to the public. I have never run across any abuse of the environment. The people who use it trease it. You know there are many juvenile delinguents who never get the joy of nature and the thrill of some praire history coming alive for them. Please keep these areas open for the safety and well-being of our minds and overall health. Please help families to be healthier, happier, asnd future generation will benefit from the well-being of this generation. KEEP PUBLIC Grasslands LANDS OPEN i-1

Thank you from Maria Biondo Longton (760) 789-4772

Comment Letter j

From: Albright, Brian
Sent: Friday, January 13, 2012 4:44 PM
To: Boaz, Trish; Powell, Sabrina
Subject: Fw: IN SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

----- Original Message -----
From: Linda Richter [mailto:lrichter@mail.sdsu.edu]
Sent: Friday, January 13, 2012 04:39 PM
To: Albright, Brian
Subject: IN SUPPORT OF PUBLIC NON-MOTORIZED TRAILS IN THE RAMONA GRASSLANDS

Dear Brian,

I would like to express my concern about not being allowed access to public land in Ramona Grasslands for hiking and horseback riding. I, like many, moved to Ramona in order to enjoy and appreciate the beauty of nature, to have a more healthy lifestyle, and to have an opportunity to spend quality time with my friends and family in a natural setting. Part of that enjoyment includes having scenic and safe areas to ride my horses.

I appreciate concerns about disturbing the nesting birds -- I love birds as much as the next person. However, the trail is over one mile away from the nesting birds. And as far as equestrian use of the trails...it's hard to imagine that the horses disturb the wildlife any more than the grazing cattle. j-1

So please…let's not take away the use of these trails. These are public lands, and this is, after all, Ramona, where you don't ask people if they have horses, you ask them how many horses do they have. Horses are wonderful creatures and are among those things that make this such a unique and special community. And isn't that why we came here? It certainly was for me!

Sincerely,

Linda K. Richter

From: Rosalie Crawford [mailto:dcrawdaddy3@sbcglobal.net]
Sent: Friday, January 13, 2012 05:30 PM
To: Albright, Brian
Subject: Fwd: URGENT URGENT URENTGrasslands EIR Public Review EXTENDED

Sent from my iPhone

Begin forwarded message:

> **From:** Rosalie Crawford <dcrawdaddy3@sbcglobal.net>
> **Date:** January 13, 2012 5:12:51 PM PST
> **To:** "Briant.Albright@sdcounty.ca.gov" <Briant.Albright@sdcounty.ca.gov>
> **Subject: Fwd: URGENT URGENT URENTGrasslands EIR Public Review EXTENDED**
>
> It has come to my attention that there is a meeting coming up to change access to the grasslands. As a family we enjoy walking and horse backing there several times a week. It is a wonderful area. The boys ride their bikes and I walk there regularly with friends for the exercise. We stay on the trails and do not disturb the Eco system that is there. The horses are no more disruptive with the Eco system than the cattle. We just enjoy being out in the great outdoors.
> It would be very sad for my family and the community if the grassland were restricted from our use. k-1
>
> Thank you,
>
> Rosalie Crawford
> Sent from my iPhone

Dear Supervisor Jacob: Date: 1/14/12

I wish to express my objections to the Mitigated Negative Declaration put out by Parks and Recreation which ignores, and either naively or arrogantly, dismisses the biology expressed by the Fish and Wildlife Department experts, The Nature Conservancy, and the Wildlife Research Institute's Eagle Biologists, among others.
I want to make five important points:

1. The written text of the Mitigated Negative Declaration does not correlate with the maps. For example, the trails proposed, especially the Old Survey Road opening, comes dangerously close to the Golden Eagle nest. ALL EXPERTS AGREE THAT THIS WILL CAUSE THE ULTIMATE DEMISE OF THIS BREEDING PAIR. The text says it is 4000' away, the actual map is much closer. In fact it is 2400'. This is too close, and the trail will create more and more disturbance in one of our few successful Golden Eagle nest sites. This trail is within sight of the nest! I-1

2. The monies used to purchase the Ramona Grasslands Preserve were mitigation to help protect a sensitive ecosystem, Section 6 Federal Funds . These funds are being misappropriated and are being used instead to create recreation parks. The first priority is to protect wildlife and sensitive habitat, not create a park prioritizing recreational activities. I-2

3. As part of the Multiple Species Conservation Plan you are required to protect wildlife first and foremost. I-3

Excerpt from the <u>County Multiple Species Conservation Plan Program Subarea Management Plan</u>:

"Management Goals and Objectives: The overall MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction."

4. These proposed trails, parking lots, bridges, and recreation will create "edge effect" and destroy the integrity of the habitat as wildlife hunting and foraging grounds and as wildlife corridors. People will not stay on trails. I feel a perimeter trail system should be developed and widen existing roads and easements and make it safe for people to ride bikes and horses on the sides of existing roads. I-4

5. I realize the county only has a Parks and Recreation Department, but their expertise and narrow focus is in recreation and not in managing Wildlife Preserves so humans and wildlife can co-exist. I-5

Sincerely,

Mary Dale 200 OLIVE AVE #4 VISTA CA 92083

Signature Address

Printed Name: MARY DALE

MITIGATION MONITORING AND REPORTING PROGRAM

RAMONA GRASSLANDS PROJECT

Mitigation measures have been identified in the Mitigated Negative Declaration for the Ramona Grasslands Project to reduce or avoid potential environmental impacts. In order to ensure compliance, the following mitigation monitoring program has been formulated. This program provides a checklist of who is responsible for the mitigation, when the mitigation will occur and the measure to document compliance.

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
In order to avoid potential impacts on federally and/or state-listed plant species, the following measures shall be implemented:				
a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by listed plant species to ensure avoidance.	DPR Biologist	During construction	Biological monitoring report	
b. Focused surveys for listed plant species shall be conducted within the offsite east–west trail easement that connects the eastern and western portions of the Preserve, and within the vicinity of the proposed new offsite trail segment on the Ramona Municipal Water District (RMWD) property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trail in these offsite locations shall avoid impacts on listed plant species.	DPR Biologist	Prior to construction	Biological monitoring report	
In order to avoid potential impacts on County List A and/or B plant species, the following measures shall be implemented:				
a. A biological monitor shall be present during all project construction within the vicinity of areas occupied by County List A and B plant species to ensure impacts are avoided or minimized to the extent feasible.	DPR Biologist	During construction	Biological monitoring report	
b. Focused surveys for County List A and B plant species shall be conducted within the	DPR Biologist	Prior to construction	Biological monitoring report	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
offsite east–west trail easement that connects the eastern and western portions of the Preserve, and within the vicinity of the proposed offsite trail segment on the RMWD property if the alternative offsite Santa Maria Creek crossing is utilized. The final alignment of the trails in these offsite locations shall avoid impacts on County List A and B plant species to the maximum extent feasible.				
During construction of all proposed new trail segments in the vicinity of suitable/occupied arroyo toad habitat in the NW portion of the Preserve (unless deemed unsuitable for toad), including the crossing (bridge or dry weather crossing) of Santa Maria Creek arroyo toad avoidance and minimization measures will be implemented. Measures will be finalized during consultation under the Federal Endangered Species Act, but could include the following:				
a. Construction within arroyo toad breeding habitat will take place outside of the arroyo toad breeding season (defined as March 15 through July 31). Construction within arroyo toad upland aestivation habitat will take place during the arroyo toad breeding season (defined as March 15 through July 31).	DPR Biologist and DPR Construction Manager	During construction	Biological monitoring report	
b. Access to the project sites will be via existing access routes to the greatest extent possible. Project-related vehicle travel would be limited to daylight hours as arroyo toads use roadways primarily during nighttime hours	DPR Construction Manager	During construction	Construction fieldbook notes	
c. Activities that attract small insects (e.g., ants) and toad predators should be minimized by keeping the project sites as clean as possible. All food-related trash	DPR Construction Manager	During construction	Construction fieldbook notes	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
should be placed in sealed bins or regularly removed from the site.				
d. Dust control (i.e., water truck spraying) should be performed in a manner that does not attract toads into the action area and by performing when the toad exclusion fence is up and minimizing overspray.	DPR Construction Manager	During construction	Construction fieldbook notes	
e. Arroyo toad exclusion fencing would be installed around the perimeter of all work areas within suitable arroyo toad upland habitat prior to construction. The purpose of the fence is to exclude arroyo toads from the work sites. Such fencing would consist of fabric or plastic as least two feet high, staked firmly to the ground with the lower one foot of material stretching outward along the ground and secured with a continuous line of gravel bags. No digging or vegetation removal will be associated with the installation of this fence and all fencing materials (i.e., mesh, stakes, etc.) would be removed following construction within the work area. Ingress and egress of equipment and personnel will use a single access point to the site. This access point will be as narrow as possible and will be closed off by exclusionary fencing when personnel are not on the project site.	DPR Biologist and DPR Construction Manager	Prior to construction	Photos	
f. Within the week prior to commencement of construction activities, but after exclusionary fencing has been installed, at least three surveys for arroyo toads will be conducted on consecutive nights within the fenced areas by a USFWS-approved biologist. Surveys would be conducted during appropriate climatic conditions and during the appropriate time of day or night to maximize the likelihood of encountering toads. If climatic conditions are not appropriate for arroyo toad movement	Service approved biologist	Prior to construction	Arroyo toad protocol survey report (or monitoring log)	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
during the surveys, a qualified biologist may attempt to illicit a response from the arroyo toads (during the night [i.e., at least 1 hour after sunset] with temperatures above 50 degrees Fahrenheit), by spraying the project area with water to simulate a rain event. If arroyo toads were found within the project area they would be captured and translocated, by the biologist, to the closest area of suitable habitat along Santa Maria Creek. The biologist would coordinate with the County and the USFWS to determine a specific translocation site prior to moving any arroyo toads. The date, time of capture, specific location of capture (using GPS), approximate size, age, and health of the individual would be recorded and provided to the USFWS within 2 weeks of the translocation in both hard copy and digital format.				
g. Excavations will be properly covered to prevent toads from entering any open pits.	DPR Construction Manager	During construction	Construction fieldbook notes	
h. The USFWS-approved biologist would be on call and available as needed at other times in the event that a toad was encountered during the activities. The USFWS-approved biologist would be present on site full-time, for 2-3 days, following any measurable rainfall.	Service approved biologist	During construction	Biological monitoring report (or monitoring log)	
i. If, during project implementation there is a toad sighting, the USFWS-approved biologist will halt work and contact the County. The County would contact the USFWS directly. Any type of "take" of toads, which includes digging up, handling (i.e., relocating the toad), injury, or death	Service approved biologist	During construction	Biological monitoring report (or monitoring log)	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
would be reported immediately to the USFWS.				
j. If determined to be necessary, a biological monitor shall be present during major trail maintenance within suitable/occupied arroyo toad habitat to ensure potential impacts are avoided to the extent feasible.	DPR Biologist	During trail maintenance	Biological monitoring report (or monitoring log)	
In order to avoid potential impacts on Stephens' kangaroo rats (SKR), the following measures shall be implemented:				
a. Prior to initiating any construction work at the staging area, SKR exclusionary fencing shall be installed.	DPR Biologist and DPR Construction Manager	Prior to construction	Photos	
b. Once fencing is installed, focused surveys for SKR will be conducted prior to construction of the staging area.	DPR Biologist	Prior to construction	Biological monitoring report (or monitoring log)	
c. In order to render the staging area unsuitable for SKR (i.e., minimize the risk of attracting additional SKR into the staging area impact area), the County will first initiate the import and placement of 10 to15 cm (4 to 6 in) of decomposed granite (DG) on the driving and parking surfaces.	DPR Construction Manager	During construction	Construction fieldbook notes	
d. If SKR are found, prior to importing and placing the DG, a qualified SKR biologist will complete 3 nights of exclusion trapping at least 24 hours, and no more than 72 hours, in advance of the ground disturbing activity. All traps will be placed within the staging area. Prior to the first night of trapping, and each subsequent night of trapping, the entrances to all potential SKR burrows within the staging area will be cleared of debris and brushed to clear away all signs of activity. All burrows will be checked in the morning following trapping to determine if there was SKR activity at the	Qualified SKR Biologist	Prior to construction	Biological monitoring report (or monitoring log)	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
burrow during the trapping session. Following the final night of trapping, the number of burrows showing SKR activity will be quantified and reported to the USFWS's Carlsbad Fish and Wildlife Office and California Department of Fish and Game (CDFG). SKR that are trapped are expected to be held for a period of no more than 72 hours, until the import and placement of DG within the staging area is initiated. SKR procurement and holding conditions will follow the 2007 "Guidelines of the American Society of Mammalogists for the Use of Wild Mammals in Research" (Gannon et al. 2007). Animals will be kept in solitary enclosures while in captivity to reduce the potential for injury or disease transmission and will be released into the SKR management area at Oak Country, the emergency access mowed area or other location determined in consultation with the USFWS Carlsbad Fish and Wildlife Office and CDFG. The release will be into artificial burrows as designed and previously approved for Oak Country.				
e. Prior to importing and placing DG, the qualified SKR biologist will determine the status of burrows within the staging area, if any, and if it is practicable to avoid, will flag any potential SKR burrows and create a 3 to 4.5-meter (m) [10 to 15-foot (ft)] buffer around the burrow to encompass the entire underground portion of the burrow complex. All areas to be avoided will be clearly marked on project maps and provided to the contractor. The qualified SKR biologist will be on site daily while construction and/or surface disturbing activities are taking place to ensure compliance with these avoidance and minimization	Qualified SKR Biologist	Prior to and during construction	Biological monitoring report (or monitoring log)	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
measures. f. A biological monitor shall be present during all trail and staging area construction and major trail/staging area maintenance within suitable/occupied SKR habitat to ensure avoidance of occupied burrows. g. Prior to conducting trail/staging area maintenance activities in areas known to support SKR, a qualified biologist shall mark all occupied or potentially occupied burrows. Marked burrows shall be avoided by a distance of no less than a 10-15-foot buffer around the burrow to encompass the entire underground portion of the burrow. h. Trail maintenance will not create berms 5 inches or higher. i. Trail/staging area construction and/or maintenance activities will be avoided during rainy periods when burrows may be more susceptible to collapse and impact from vehicular and foot traffic.	DPR Biologist Qualified SKR Biologist DPR Biologist DPR Biologist	During construction Prior to trail/staging area maintenance During trail maintenance During trail/staging area construction and/or maintenance activities	Biological monitoring report (or monitoring log) Biological monitoring report (or monitoring log) Biological monitoring report (or monitoring log) Biological monitoring report (or monitoring log)	
A pre-construction burrowing owl survey to identify any active burrows shall be conducted within the vicinity of the offsite east–west trail easement that connects the eastern and western portions of the Preserve and within the vicinity of the offsite trail segment on RMWD property if the alternative Santa Maria Creek crossing is utilized. Pre-construction surveys must be completed no more than 30 days before initial brushing, clearing, grubbing, or grading of this new trail section. The final trail alignment in this location shall avoid impacts on occupied burrows and, if occupied burrows are found within 300-feet of the proposed trail, trail construction shall occur outside of the breeding season for this species (i.e., September 1 to January 31).	DPR Biologist	Prior to construction	Biological monitoring report (or monitoring log)	
Vegetation clearing or grading shall be restricted during the breeding season for migratory birds	DPR Biologist	Prior to construction	Biological monitoring report if outside of	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
(approximately January 15 through September 15 annually) unless pre-construction surveys by a qualified biologist determine no nesting birds protected by the MBTA are located within grading/vegetation clearing areas. If active nests are identified within the impact area on site, vegetation clearing activities shall not occur within 300 feet of active migrant songbird nests, 500 feet of active tree nesting raptor nests, 300 feet of active burrowing owl burrows, and 800 feet of other ground-nesting raptor nests until either the breeding season has ended or the nest is no longer active.			breeding season (or monitoring log) CDFW and Service waiver, if within breeding season	
The final alignment and design of the southern section of the pathway along Rangeland Road and the pathway along Highland Valley Road will avoid impacts on sensitive natural communities/riparian habitat to the maximum extent feasible. Where unavoidable impacts are proposed, they will be quantified and mitigated at established mitigation ratios (e.g., in accordance with ratios outlined in the County's adopted MSCP or, when adopted, the North County Plan).	Resource Management Division Staff	Prior to construction of Phase III	Offsite preservation or purchase of mitigation credits	
Proposed Project or Alternative Santa Maria Creek Crossing - Purchase of 3.51 acres of Non-native Grassland mitigation credits within an approved mitigation bank or in accordance with I-138.	Resource Management Division Staff	Prior to construction of Phase I	Offsite preservation or purchase of mitigation credits	
Proposed Project - Purchase of 1.26 acres of Non-native Grassland, 0.24 acre of Open Coast Live Oak Woodland, 0.018 acre of Disturbed Wetland, 0.006 acre of Non-Vegetated Channel, and 0.055 acre of Southern Mixed Chaparral mitigation credits within an approved mitigation bank or in accordance with I-138. Alternative Santa Maria Creek Crossing – Purchase of 0.42 acre of Non-native Grassland, 0.21 acre of Open Coast Live Oak Woodland,	Resource Management Division Staff	Prior to construction of Phase II	Offsite preservation or purchase of mitigation credits	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
and 0.05 acre of Southern Mixed Chaparral mitigation credits within an approved mitigation bank or in accordance with I-138.				
Prior to impacting regulated waters, including wetlands, the following permits/approval would be required to be obtained: (1) USACE, CWA, Section 404 permit for placement of dredged or fill material within waters of the U.S.; (2) RWQCB, CWA, Section 401 State water quality certification/waiver for an action that may result in degradation of waters of the State; (3) CDFW Streambed Alteration Agreement. If a span bridge is constructed for the proposed crossing of Santa Maria Creek (or if the alternative crossing of Santa Maria Creek on the RMWD property is utilized), impacts would be avoided and no mitigation would be required. While the construction of a trail/dry weather crossing of Santa Maria Creek would result in impacts; wetland creation is not proposed. The impact area, and immediately adjacent areas, is currently unvegetated, and after project implementation, would continue to convey water. Mitigation for impacts on jurisdictional wetlands (disturbed wetland and non-vegetated channel) and non-wetland waters is proposed to consist of offsite restoration and/or enhancement. The details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB.	Resource Management Division Staff	Prior to construction	USACE, CWA, Section 404 permit; RWQCB, CWA, Section 401 State water quality certification/waiver; and CDFW Streambed Alteration Agreement	
The final alignment and design of the southern section of the pathway along Rangeland Road and the pathway along Highland Valley Road will avoid impacts on jurisdictional wetlands and waters. Where unavoidable impacts are proposed, a formal wetland delineation will be conducted of the impact area, the impacts will be quantified, and impacts will be mitigated.	Resource Management Division Staff	Prior to construction	Formal wetland delineation in the event unavoidable impacts are proposed and USACE, CWA, Section 404 permit; RWQCB, CWA, Section 401 State water quality certification/waiver; and	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation for impacts on jurisdictional wetlands (disturbed wetland and non-vegetated channel) and non-wetland waters is proposed to consist of offsite restoration and/or enhancement. The details of the mitigation for impacts on jurisdictional resources (including a conceptual mitigation plan) will be finalized as part of the permitting process with the USACE, CDFG, and RWQCB.			CDFW Streambed Alteration Agreement	
The following avoidance and minimization measures for golden eagle shall be implemented:				
Closure and passive restoration of the southern trail loop associated with Old Survey Road 97 closest to the known nesting location.	DPR Biologist	After Board approval of Project	Biological monitoring report (or monitoring log)	
On-going monitoring and adaptive management of the Preserve to facilitate docent led tours, when appropriate, of Old Survey Road 97 in the NW portion. The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known offsite nest locations to determine occupancy during the breeding period (December through June).	DPR Biologist or other entities responsible for regional monitoring	After Board approval of Project	Biological monitoring report	
DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts on golden eagles.	DPR Staff and Biologist	After Board approval of Project	Biological monitoring report (or monitoring log)	
Planting of cactus thickets along the portion of the trail within the NW portion of the Preserve closest to the known off-site golden eagle nesting location to deter off-trail use.	DPR Staff and Biologist	After Board approval of Project	Biological monitoring report (or monitoring log)	
Installation of fencing, signage or other barriers to avoid off-trail disturbance to known breeding locations, foraging habitat, and preferred perch	DPR Staff and Biologist	During construction	Biological monitoring report (or monitoring log)	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
spots. Development and implementation of passive and/or active restoration of abandoned trails and other areas that may encourage off-trail activities. Continued maintenance to control the spread of invasive exotic plant species within the Preserve.	DPR Staff and Biologist DPR staff and Biologist	During construction After construction	Biological monitoring report (or monitoring log) Biological monitoring report (or monitoring log)	
Prior to any ground-disturbing activities prescribed in the RMP and VMP, including fire management, invasive nonnative plant removal efforts, and revegetation, the proposed area of activity will be reviewed for cultural resources. If cultural resources occur in the area, ground disturbing impacts in the area of the resource should be avoided, thereby fulfilling the management directives for cultural resources. To avoid impacts, the RMP and VMP generally stipulate the use of techniques that would not disturb the ground, such as passive habitat restoration and vegetation removal. If avoidance and non-destructive methods are infeasible, the affected resource should be evaluated for significance by a qualified archaeologist, per County guidelines.	Professional Archaeologist	Prior to any ground - disturbing activities prescribed in the RMP and VMP	Cultural monitoring report (or monitoring log)	
Prior to the construction of any new trail segments or the proposed bridge, all of which were located to avoid cultural resources, the locations of new construction shall be field checked by a qualified archaeologist to ensure that they do indeed avoid known cultural resources. To avoid adverse impacts on P-37-030845 (County Survey Road 97), a federal, state, and locally significant resource, a passive form of revegetation shall be adopted for restoration of the southern loop trail of County Survey Road 97. For CA-SDI-10270, a resource located along the	Professional Archaeologist Professional	Prior to construction Prior to construction	Cultural monitoring report (or monitoring log) Cultural monitoring report	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
proposed east-west connector trail on non-Preserve land, the location of the site shall be confirmed in the field by a qualified archaeologist and the trail shall be rerouted if possible to avoid impacts. If avoidance is infeasible, the resource should be evaluated for significance by a qualified archaeologist, per County guidelines.	Archaeologist		(or monitoring log)	
The location of the proposed viewing pavilion/kiosk in the NE portion of the Preserve shall be designed to avoid the one cultural resource in the area, CA-SDI-16628.	Professional Archaeologist	Prior to construction	Cultural monitoring report (or monitoring log)	
All trail signs, markers, fencing, and gates in the Preserve should be placed in areas that avoid known cultural resources. If this recommendation cannot be met, MM-4 shall be followed during installation.	Professional Archaeologist	Prior to installation	Cultural monitoring report (or monitoring log)	
All ground-disturbing activity related to implementation of the project, including installation of trail signage, potential building removal, trenching, grading associated with trail installation, etc., shall be monitored by a qualified archaeologist and, where the resource involved is a prehistoric archaeological site, by a Native American representative. If cultural resources are discovered during monitoring, all work within 50 feet of the discovery shall stop until a qualified archaeologist can evaluate the find and make appropriate recommendations for treatment.	Professional Archaeologist and Native American Monitor, as appropriate	During construction	Cultural monitoring report (or monitoring log)	
Any ground-disturbing activities on the Preserve must be considered as having the potential to encounter Native American human remains. Human remains require special handling and must be treated with appropriate dignity. Specific actions must take place pursuant to CEQA Guidelines Section15064.5e, Public Resources Code (PRC) Section 5097.98, and Section 87.429 of the County of San Diego Grading,	Professional Archaeologist and Native American Monitor as appropriate	During construction	Cultural monitoring report	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
Clearing and Watercourses Ordinance. Should Native American human remains be identified during ground disturbing activities related to the project, whether during construction, maintenance, or any other activity as outlined in the RMP and VMP, State and County mandated procedures shall be followed for the treatment and disposition of those remains, as follows: In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, DPR will ensure that the following procedures are followed: a. There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains, until: 1. A County (DPR) official is contacted. 2. The County Coroner is contacted to determine that no investigation of the cause of death is required. 3. If the Coroner determines the remains are Native American, then: i. The coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. ii. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. iii. The Most Likely Descendent (MLD) may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in PRC Section 5097.98.	Resource Management Division staff	During construction	Native American consultation and County Coroner notification	

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
b. Under the following conditions, the landowner or its authorized representative shall rebury the Native American human remains and associated grave goods on the property in a location not subject to further disturbance: 1. The NAHC is unable to identify a MLD or the MLD fails to make a recommendation within 24 hours after being notified by the NAHC. 2. The MLD fails to make a recommendation. 3. The landowner or his authorized representative rejects the recommendation of the MLD, and mediation by the NAHC fails to provide measures acceptable to the landowner. c. Any time human remains are encountered or suspected and soil conditions are appropriate for the technique, ground penetrating radar (GPR) will be used as part of the survey methodology. In addition, the use of canine forensics will be considered when searching for human remains. The decision to use GPR or canine forensics will be made on a case-by-case basis through consultation among the County Archaeologist, the project archaeologist, and the Native American monitor. d. Because human remains require special consideration and handling, they must be defined in a broad sense. For the purposes of this document, human remains are defined as: 1. Cremations, including the soil surrounding the deposit. 2. Interments, including the soils surrounding the deposit. 3. Associated grave goods. In consultation among the County archaeologist, project archaeologist, and Native American				

Mitigation Measure	Monitor	Schedule	Compliance Action	Verification of Compliance (Date/Notes)
monitor, additional measures (e.g., wet-screening of soils adjacent to the deposit or on site) may be required to determine the extent of the burial.				

* Critical Project Design Measures

- While the management directives and implementation measures outlined in the Resource Management Plan and Vegetation Management Plan are technically not mitigation measures, the implementation of these plans must be assured to avoid potentially significant environmental effects. The Resource Management Plan and Vegetation Management Plan are attached as part of this Mitigated Negative Declaration.

Attachment 2 - Addendum 1

County of San Diego

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May 10, 2018

Environmental Review Update Checklist Form
For Projects with Previously Approved Environmental Documents

FOR PURPOSES OF CONSIDERATION OF
Ramona Grasslands Preserve Opening
Northwest Portion Project

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND), Mitigated Negative Declaration (MND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form and Findings have been prepared in accordance with CEQA Guidelines Section 15162 to explain the rationale for determining that an addendum to the previously adopted Mitigated Negative Declaration (MND) will be prepared for the subject discretionary action.

1. Background on the previously certified MND:

   An MND for the Ramona Grasslands Preserve Project (SCH #2011111054), which, among other things, established a trail network in the Ramona Grasslands Preserve, was adopted by the San Diego County Board of Supervisors on August 7, 2013. The adopted MND identified significant impacts to biological and cultural resources from the project and included mitigation measures that would reduce each of these impacts to below a level of significance. The MND was circulated for public review from November 17, 2011 through January 17, 2012, and 64 comment letters were received. One comment from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife (herein referred to as the Wildlife Agencies) requested that the north/south trail in the northwest portion of the Preserve (i.e., “Old Survey Road 97”) be removed from year-round use by the public, except that the trail could be opened for docent-led tours at appropriate times of the year. This request was based on the concern that golden eagle nests may be disturbed by increased public use of trails and/or the breeding success of an off-site golden eagle nest in Bandy Canyon could be impacted.

Although the County CEQA analysis and findings did not support this assertion, in spirit of partnership and collaboration with the Wildlife Agencies, the County made the following change to the project description in the final MND: Old Survey Road 97 was removed from the year-round planned trail system, with the exception that the trail would be opened for docent-led tours to be held one day per week (Saturday) during the golden eagle non-breeding season (August 15 – November 15)[1]. Also additional changes were made to the project related to golden eagles, including the addition of eagle-specific avoidance and minimization measures. Subsequently, minor edits were made to the project impacts and proposed mitigation in response to changes made to the proposed trail system. These changes did not require recirculation of the MND, and the County Board of Supervisors adopted the revised MND. The Ramona Grasslands Project Adopted MND is included as Attachment 1.

2. Lead agency name and address:
   County of San Diego, Department of Parks and Recreation
   5500 Overland Avenue, Suite 410
   San Diego, CA 92123

   a. Contact: Deborah Mosley, Group Program Manager
   b. Phone number: (858) 966-1374
   c. E-mail: Deborah.Mosley@sdcounty.ca.gov

3. Project applicant's name and address:
   County of San Diego, Department of Parks and Recreation
   5500 Overland Avenue, Suite 410
   San Diego, CA 92123

4. Summary of the activities previously approved in the Ramona Grasslands Preserve project:

   The adopted Ramona Grasslands Preserve Project (Project) provided resource management and recreational use improvements to enhance the existing Ramona Grasslands Preserve (Preserve). The Project had four components including implementation of the management directives identified in 1) the Ramona Grasslands Preserve RMP; 2) the Ramona Grasslands Preserve Vegetation Management Plan (VMP); 3) establishment of a multi-use trail system within the Preserve consistent with the Ramona Grasslands Preserve Public Access Plan (PAP); and 4) construction of supporting infrastructure improvements.

   The County proposes to change component (3) of the Project related to Old Survey Road 97. The other three components listed above will remain unchanged and do not require additional analysis under CEQA.

[1] According to the USFWS *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* published in 2010, "Breeding surveys for Golden Eagles are latitude and elevation dependent; however, their nesting season ranges in the contiguous United States from 01 January to 31 August." This would make the non-breeding season September 1 – December 31; however, the USFWS directed DPR to implement the recommendation of Dr. Pete Bloom made on May 22, 2017 in an unpublished letter to allow opening of Old Survey Road 97 during the non-breeding season, defined as August 15 – November 15.

Component 3 of the Project included the addition of a 5.5-mile multi-use trail system for hiking, biking, and equestrian users, a crossing of Santa Maria Creek, a staging area up to three acres in size, a maintenance building, viewing pavilion/visitor kiosk and two volunteer pads. The proposed trail system will utilize existing ranch roads and trails to the greatest possible extent, with construction of approximately 1.2 miles of new trail and a new crossing of Santa Maria Creek. The proposed trail system will connect to 3.8 miles of the recently constructed Western Portion Trails, forming a total trail system of 9.3 miles. Approximately 2.1 miles of pathways were also proposed within the road right of way to increase connectivity between trail systems.

Trail and infrastructure construction and recreational use within the Preserve were proposed in three phases:

- Phase I included the establishment of 2.8 miles of existing trails and construction of a staging area and associated infrastructure (maintenance building, viewing pavilion/visitor kiosk, and 2 volunteer pads) in the northeast portion of the Preserve. Funding for Phase I was secured and construction of one volunteer pad and the viewing pavilion/visitor kiosk occurred in the fall of 2014 along with the establishment of 2.8 miles of existing trails.

- Phase II involved connecting the existing Western Portion Trail system to Phase I. This included the establishment of 1.5 miles of existing trail, construction of 0.8 miles of new trail with a crossing of Santa Maria Creek within the northwest portion of the Preserve, construction of a 0.7-mile pathway on the west side of Rangeland Road, and installation of road crossing signage and construction of 0.4 miles of new trail within a public access easement on Ramona Municipal Water District property located east of Rangeland Road. Phase II proposed a total of 2.7 miles of trail and 0.7 miles of pathway. It was not expected that Phase II would be pursued until Phase I was completed, monitored and adaptively managed to ensure public use of the Preserve was consistent with the intent of existing deed restrictions and conservation easements.

- Phase III, if feasible, would have constructed 1.3 miles of pathway along the southern portion of Rangeland Road and along Highland Valley Road, to ultimately connect the northwest and northeast portions of the Preserve to the existing Western Portion staging area. Phase III was considered a future phase as it would have likely involved relocation of utilities within the road right of way.

For the reasons stated in Section 1 above, Old Survey Road 97 was removed from the year-round planned trail system in Phase I, and a limitation on its use was imposed. The trail could be opened for docent-led tours held only on Saturdays during the golden eagle non-breeding season (August 15 – November 15).

As described above, Old Survey Road 97 is currently open to the public through docent led tours held only on Saturdays during the golden eagle non-breeding season (August 15 – November 15). The County proposes to revise the project to allow hiking, biking and horseback riding on Old Survey Road 97 during the golden eagle non-breeding season (August 15 – November 15) on an additional day each week for a total of 2 days each week (Saturday and Sunday) and eliminate the requirement that the use of the trail be led

by a docent. The reason for the change is to 1) allow trail users sufficient opportunity to access regional trails from the preserve (i.e., the Coast to Crest Trail in San Pasqual Valley to the north) pursuant to the deed restrictions and the conservation easements encumbering the property (see Attachment 2-ADDENDUM for details); and 2) meet the intent of the trails system proposed in the original MND while still avoiding impacts to sensitive resources. Measures to ensure that no impacts to golden eagle will occur have been incorporated into the project and include the following:

Implementation of seasonal closure of the proposed trail (November 16 – August 14), closure and passive restoration of the southern spur of Old Survey Road 97 nearest the eagle nest site, discouraging off-trail activities that would bring trail users close to the off-site golden eagle nest, educational signage and ranger presence, educational outreach to neighboring land owners as well as hiking/biking/equestrian/rock climbing communities, continued maintenance to control the spread of invasive species within the Preserve and enhancing foraging habitat within the Preserve.

Before trail users are allowed on the proposed trail they will be required to watch an educational training video through the County Learning Management System. Information regarding the training will be posted in the kiosk located in the staging area in the southwest portion of the Preserve and on the gate located at Rangeland Road in the northwest portion of the Preserve. This training will discuss the sensitive resources in the northwest portion of the Preserve including golden eagle. Discussion of golden eagle will include key information including how to identify the bird, distribution throughout the state and County, habitats where the bird resides, prey base, behavior traits and why this bird is considered sensitive. The trail user will take an exam at the end of the training and a permit will be given if the exam is passed. The trail user will then take the permit with them when using the trail. County staff will be accessing the trail periodically asking trail users to produce the educational training permit. If the trail user does not have a permit then the County staff person will ask the trail user to come back when the on-line training has been completed. The permit will be valid for one “trail season” (August 15 – November 15) each year.

Lastly, the off-site golden eagle nest is situated in an open space easement dedicated to the County. This easement is for the protection of biological resources and gives the County authority to prohibit access to and within the easement to ensure the terms and conditions of the easement are not violated allowing for the protection of the golden eagle nest and the golden eagle pair. In addition, the open space easement authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purpose of species and habitat conservation. Management activities including placement of signs, ranger patrols and educational outreach to adjacent land owners and hiking/biking/equestrian/rock climbing communities have been implemented to ensure potential trespassers are aware of the risks and environmental issues.

5. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR**. The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new

information of substantial importance, as indicated by the checklist and discussion on the following pages.

☒ NONE

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology & Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Haz Materials	☐ Hydrology & Water Quality
☐ Land Use & Planning	☐ Mineral Resources	☐ Noise
☐ Population & Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities & Service Systems	☐ Mandatory Findings of Significance

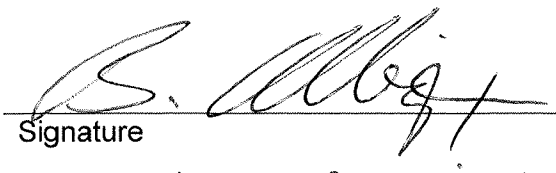
DETERMINATION:
On the basis of this analysis, Department of Parks and Recreation has determined that:

☒ No substantial changes are proposed in the project, and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted MND is adequate upon completion of an ADDENDUM. The Addendum prepared for the proposed project is included as Attachment 2.

☐ No substantial changes are proposed in the project, and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with an EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.



Signature

May 10, 2018
Date

Brian Albright
Printed Name

Director of Parks and Recreation
Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be prepared when there is a previously adopted ND or a previously certified EIR for a project.

CEQA Guidelines Section 15162(a) and 15163 state that when an ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

FINDING: No substantial changes are proposed in the project which will require major revisions of the previously adopted MND due to the involvement of significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The MND for the project analyzed the impact of allowing year-round trail use on Old Survey Road 97 and concluded that there would be no significant impact from such use. In response to a comment from the Wildlife Agencies concerning use of this trail and potential impacts to golden eagle nesting sites, the County altered the project description to limit the use of the Old Survey Road 97 trail to one day per week outside the golden eagle breeding season, and required that use of the trail be supervised by a docent. During the three years the trail has been open for use by the public (2015 - 2017) through docent led tours, a raptor study was prepared to document use of the Ramona Grasslands area by golden eagles and other raptors in 2015 and 2016. The study included preserve – wide raptor foraging surveys and golden eagle nest monitoring in Bandy Canyon using spotting scopes and heat maps to determine where the eagles were actively foraging and perching. During the study, golden eagles were detected on the Preserve year-round with the highest density of observations occurring in the northwest portion of the Preserve. Observations during the surveys of the off-site golden eagle nest in Bandy Canyon included nest building activity in January 2016 and a golden eagle incubating eggs on the nest in March 2016. These observations were made after a total of 177 people used Old Survey Road 97 between October 3, 2015 and January 2, 2016.[2]

A total of 99 people used the same trail between October 1 and November 26, 2016. Then on February 10, 2017, DPR staff observed a golden eagle on the nest, which was subsequently observed on the nest throughout the remainder of the 2017 nesting season.

In 2017, a total of 108 people used Old Survey Road 97 between September 2 and November 18 and, regardless of human presence during the non-breeding season, USGS reported to DPR staff on February 21, 2018 that they observed the Bandy Canyon golden eagle pair incubating on the nest.

During the raptor study period, hikers used trails within the Preserve and that use did not limit the foraging activity of the raptors, including golden eagles. Specifically, the raptor study

[2] For the first year of docent-led tours, DPR defaulted to the golden eagle non-breeding season dates in the Ramona Grasslands Preserve Resource Management Plan, which were August 1 to December 31.

provides evidence that foraging in the Preserve is not deterred either by the daily use of trails in the southwest portion of the Preserve or by the docent led tours along Old Survey Road 97 in 2015 and 2016 outside the golden eagle breeding season. It was also noted during the raptor study that foraging activity was not affected by the use of the Preserve for cattle grazing, including frequent visits by the cattle rancher, maintenance activities by DPR staff, or the use of the nearby Ramona Airport.

Through the County's Targeted Monitoring Plan, monitoring of foraging behavior of golden eagles throughout the Preserve and monitoring of the off-site golden eagle nest will continue.

From a regional perspective, USGS telemetry data of golden eagles throughout San Diego County shows that eagles are currently active near recreational areas open for public use, including trails on Barnett Ranch, Otay Lakes, Tijuana River Valley Regional Park, Blue Sky Ecological Reserve, Iron Mountain, Mount Woodson, Boden Canyon Ecological Reserve, Hauser Mountain Wilderness, Cleveland National Forest, and highly developed areas such as the community of Ramona. Opening the trail without docent led tours and for one more day during the week will not impact golden eagle movement over the northwest portion of the Preserve. The County will continue partnering with USGS regarding the County-wide telemetry study and nest occupancy surveys.

Copies of the Raptor Study prepared by San Diego County and the USGS telemetry data of golden eagles are incorporated herein by reference.

Based on the results of the raptor study, the data collected by USGS and the continued use of the Bandy Canyon nest during the allowed trail use on Old Survey Road 97 for the past several years, it can be concluded that opening Old Survey Road 97 for one additional day per week to allow hiking, biking and horseback riding without the requirement that a docent lead such activities will not require major revisions to the previous MND due to the involvement of new significant environmental effects and will not cause a substantial increase in the severity of previously identified significant effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

FINDING: No substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The circumstances under which the project is undertaken remain the same as they were when the project was approved. At the time the project was approved, golden eagles were using the Ramona Grassland Preserve, including Old Survey Road 97 for foraging, and the Bandy Canyon nest was utilized by a breeding pair of golden eagles. Over the past three years that the trail has been open for use by the public (2015 - 2017) through docent led tours, a raptor study was prepared to document use of the Ramona Grasslands area by golden eagles and other raptors in 2015 and 2016. The study included preserve – wide raptor foraging surveys and golden eagle nest monitoring in Bandy Canyon using spotting scopes and heat maps to determine where the

eagles were actively foraging and perching. During the study, golden eagles were detected on the Preserve year-round with the highest density of observations occurring in the northwest portion of the Preserve. Observations during the surveys of the off-site golden eagle nest in Bandy Canyon included nest building activity in January 2016 and a golden eagle incubating eggs on the nest in March 2016. These observations were made after a total of 177 people used Old Survey Road 97 between October 3, 2015 and January 2, 2016.[3]

A total of 99 people used the same trail between October 1 and November 26, 2016. Then on February 10, 2017, DPR staff observed a golden eagle on the nest, which was subsequently observed on the nest throughout the remainder of the 2017 nesting season.

In 2017, a total of 108 people used Old Survey Road 97 between September 2 and November 18 and, regardless of human presence during the non-breeding season, USGS reported to DPR staff on February 21, 2018 that they observed the Bandy Canyon golden eagle pair incubating on the nest.

During the raptor study period, hikers used trails within the Preserve and that use did not limit the foraging activity of the raptors, including golden eagles. Specifically, the raptor study provides evidence that foraging in the Preserve is not deterred either by the daily use of trails in the southwest portion of the Preserve or by the docent led tours along Old Survey Road 97 in 2015 and 2016 outside the golden eagle breeding season. It was also noted during the raptor study that foraging activity was not affected by the use of the Preserve for cattle grazing, including frequent visits by the cattle rancher, or the use of the nearby Ramona Airport.

As a result, it can be found that no substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
    b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

[3] For the first year of docent-led tours, DPR defaulted to the golden eagle non-breeding season dates in the Ramona Grasslands Preserve Resource Management Plan, which were August 1 to December 31.

FINDING: No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or

b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

At the time the project was approved, golden eagles were using the Ramona Grassland Preserve, including Old Survey Road 97 for foraging, and the Bandy Canyon nest was utilized by a breeding pair of golden eagles. During operation of the project over the past three years that the trail has been open for use by the public (2015 - 2017) through docent led tours, a raptor study was prepared to document use of the Ramona Grasslands area by golden eagles and other raptors in 2015 and 2016. The study included preserve – wide raptor foraging surveys and golden eagle nest monitoring in Bandy Canyon using spotting scopes and heat maps to determine where the eagles were actively foraging and perching. During the study, golden eagles were detected on the Preserve year-round with the highest density of observations occurring in the northwest portion of the Preserve. Observations during the surveys of the off-site golden eagle nest in Bandy Canyon included nest building activity in January 2016 and a golden eagle incubating eggs on the nest in March 2016. These observations were made after a total of 177 people used Old Survey Road 97 between October 3, 2015 and January 2, 2016.[4]

A total of 99 people used the same trail between October 1 and November 26, 2016. Then on February 10, 2017, DPR staff observed a golden eagle on the nest, which was subsequently observed on the nest throughout the remainder of the 2017 nesting season.

In 2017, a total of 108 people used Old Survey Road 97 between September 2 and November 18 and, regardless of human presence during the non-breeding season, USGS reported to DPR staff on February 21, 2018 that they observed the Bandy Canyon golden eagle pair incubating on the nest.

During the raptor study period, hikers used trails within the Preserve and that use did not limit the foraging activity of the raptors, including golden eagles. Specifically, the raptor study

[4] For the first year of docent-led tours, DPR defaulted to the golden eagle non-breeding season dates in the Ramona Grasslands Preserve Resource Management Plan, which were August 1 to December 31.

provides evidence that foraging in the Preserve is not deterred either by the daily use of trails in the southwest portion of the Preserve or by the docent led tours along Old Survey Road 97 in 2015 and 2016 outside the golden eagle breeding season. It was also noted during the raptor study that foraging activity was not affected by the use of the Preserve for cattle grazing, including frequent visits by the cattle rancher, or the use of the nearby Ramona Airport.

As a result, it can be found that there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted and which shows a new significant impact or new mitigation measures would be required.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary. As a result, an addendum to the previously adopted MND will be prepared for this project change.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources, including scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

YES	NO
☐	☒

II. AGRICULTURE AND FORESTRY RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources, including conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code

section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES	NO
☐	☒

III. AIR QUALITY -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality, including conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES	NO
☐	☒

IV. BIOLOGICAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources, including adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES	NO
☐	☒

The proposed modifications to the project description would not involve substantial changes in the magnitude of impacts identified in the Ramona Grasslands Preserve Project MND (SCH #2011111054) and would not create new potentially significant impacts that would require mitigation. This conclusion is based on the analysis included in the ADDENDUM (Attachment 2).

V. CULTURAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources, including causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES	NO
☐	☒

VI. GEOLOGY AND SOILS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils, including exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

YES	NO
☐	☒

VII. GREENHOUSE GAS EMISSIONS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions?

YES	NO
☐	☒

VIII. HAZARDS AND HAZARDOUS MATERIALS – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials, including creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

YES	NO
☐	☒

IX. HYDROLOGY AND WATER QUALITY -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality, including violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act ; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

YES ☐ NO ☒

X. LAND USE AND PLANNING -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning, including physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

YES ☐ NO ☒

XI. MINERAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources, including the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES ☐ NO ☒

XII. NOISE -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise, including exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity

above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

YES	NO
☐	☒

XIII. POPULATION AND HOUSING -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

YES	NO
☐	☒

XIV. PUBLIC SERVICES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES	NO
☐	☒

XV. RECREATION -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES	NO
☐	☒

XVI. TRANSPORTATION/TRAFFIC -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic, including an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; inadequate parking capacity; and/or a conflict with

adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

YES ☐ NO ☒

XVII. UTILITIES AND SERVICE SYSTEMS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems, including exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

YES ☐ NO ☒

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

YES ☐ NO ☒

Attachments

Attachment 1 – Ramona Grasslands Project Adopted MND
Attachment 2 – CEQA Guidelines Section 15164 Addendum to the Ramona Grasslands Project MND

County of San Diego

BRIAN ALBRIGHT
DIRECTOR
(858) 966-1301

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

Date: May 10, 2018

To: Brian Albright
Director
County Department of Parks and Recreation

From: Dallas Pugh
Project Manager

RE: **CEQA Guidelines Section 15164 Addendum to Ramona Grasslands Preserve Project MND (SCH #2011111054)**

CEQA Section 15164 applies to the Ramona Grasslands Preserve (Preserve) Project MND. CEQA Section 15164 allows an addendum to a previously certified or adopted environmental document to be prepared when only minor technical changes or changes that would not result in new significant impacts are proposed in a project. The Ramona Grasslands Preserve Project MND is hereby amended by this addendum pursuant to CEQA Guidelines Section 15164.

Location: The Preserve is located within the western portion of the Valle de Pamo (or Santa Maria Valley), part of the historic Santa Maria Rancho, 6 miles east of Interstate 15, approximately 1.5 miles south of State Route 78, approximately 1.4 miles north of State Route 67, and approximately 2.0 miles west of downtown Ramona, California.

Background: An MND for the Ramona Grasslands Preserve Project (SCH #2011111054) was approved by the San Diego County Board of Supervisors on August 7, 2013. The adopted MND identified significant impacts to biological and cultural resources and included mitigation measures that would reduce each of these impacts to below a level of significance. The draft MND was circulated for public review from November 17, 2011 through January 17, 2012, and 64 comment letters were received. One comment from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife (herein referred to as the Wildlife Agencies) requested complete removal of the north/south trail in the northwest portion of the Preserve (i.e., “Old Survey Road 97”) from the proposed trail system or only opening the trail for docent-led tours at appropriate times of the year, due to the possibility of impacting foraging habitat for golden eagles and/or impacting the success of an off-site golden eagle nest in Bandy Canyon.

Although the County CEQA analysis and findings did not support this assertion, in spirit of partnership and collaboration with the Wildlife Agencies, the County made the following change to the project description in the final MND: 1) Old Survey Road 97 was removed from the year-round planned trail system, with the exception that the trail could be opened for docent-led tours during the golden eagle non-breeding season (August 15 – November 15)[1]. Also additional changes were made to the project related to golden eagles, including the addition of eagle-specific avoidance and minimization measures. Subsequently, minor edits were made to the project impacts and proposed mitigation in response to changes made to the proposed trail system. These changes did not require recirculation of the draft MND and the County of San Diego Board of Supervisors adopted the revised project description with the final MND.

Changes to the Project:

County DPR is proposing to modify the project from the original approval. As described above, Old Survey Road 97 was removed from the year- round planned trail system, with the exception that the trail would be open for docent-led tours to be held one day per week (Saturday) during the golden eagle non-breeding season (August 15 – November 15). The project description in the final MND included this change. Old Survey Road 97 is currently open to the public through docent led tours held only on Saturdays during the golden eagle non-breeding season (August 15 – November 15). The County proposes to revise the project to allow hiking, biking and horseback riding on Old Survey Road 97 during the golden eagle non-breeding season (August 15 – November 15), on one additional day each week (the additional day will be Sundays, trail will be open 2 days each week) and to remove the requirement that use of the trail be with a docent. The reason for this change is to 1) allow trail users sufficient opportunity to access regional trails from the preserve (i.e., the Coast to Crest Trail in San Pasqual Valley to the north) pursuant to the deed restrictions and the conservation easements encumbering the property (see Attachment 2-ADDENDUM for details); and 2) meet the intent of the trails system proposed in the original MND while still avoiding impacts to sensitive resources. Measures to ensure that no impacts to golden eagle will occur have been incorporated into the project and include the following:

- implementation of seasonal closure of the proposed trail (November 16 – August 14),
- closure and passive restoration of the southern spur of Old Survey Road 97 nearest the eagle nest site,
- discouraging off-trail activities that would bring trail users close to the off-site golden eagle nest,
- educational signage and ranger presence,
- educational outreach to neighboring land owners as well as hiking/biking/equestrian/ rock climbing communities,
- continued maintenance to control the spread of invasive species within the Preserve, and
- enhancing foraging habitat within the Preserve.

[1] According to the USFWS *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* published in 2010, "Breeding surveys for Golden Eagles are latitude and elevation dependent; however, their nesting season ranges in the contiguous United States from 01 January to 31 August." This would make the non-breeding season September 1 – December 31; however, the USFWS directed DPR to implement the recommendation of Dr. Pete Bloom made on May 22, 2017 in an unpublished letter to allow opening of Old Survey Road 97 during the non-breeding season, defined as August 15 – November 15.

Before trail users are allowed on the proposed trail, they will be required to watch an educational training video through the County Learning Management System. Information regarding the training will be posted in the kiosk located in the staging area in the southwest portion of the Preserve and on the gate located at Rangeland Road in the northwest portion of the Preserve. This training will discuss the sensitive resources in the northwest portion of the Preserve including golden eagle. Discussion of golden eagle will include key information including how to identify the bird, distribution throughout the state and County, habitats where the bird resides, prey base, behavior traits and why this bird is considered sensitive. The trail user will take an exam at the end of the training and a permit will be given if the exam is passed. The trail user will then take the permit with them when using the trail. County staff will be accessing the trail periodically asking trail users to produce the educational training permit. If the trail user does not have a permit then the County staff person will ask the trail user to come back when the on-line training has been completed. The permit will be valid for one "trail season" (August 15 – November 15) each year.

Lastly, the off-site golden eagle nest is situated in an open space easement dedicated to the County. This easement is for the protection of biological resources and gives the County authority to prohibit access to and within the easement to ensure the terms and conditions of the easement are not violated allowing for the protection of the golden eagle nest and the golden eagle pair. In addition, the open space easement authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purpose of species and habitat conservation. Management activities including placement of signs, ranger patrols and educational outreach to adjacent land owners and hiking/biking/equestrian/rock climbing communities have already been implemented to ensure potential trespassers are aware of the risks and environmental issues.

These modifications would not involve substantial changes in the magnitude of impacts identified in the Ramona Grasslands Preserve project MND (SCH #2011111054) and would not create new potentially significant impacts that would require mitigation. This conclusion is based on the analysis contained in the attached Environmental Review Update Checklist pursuant to CEQA Section 15162.

Further, the County finds that this project is consistent with the deed restrictions and conservation easement mandates that encumber the Ramona Grassland Preserve for the following reasons.

Consistency with Legal Documents

The Ramona Grasslands were purchased using federal and State grant funding as well as County funding. Pursuant to the deed restrictions and the conservation easements encumbering the property, the property shall be used exclusively for (a) preservation, restoration and management of the Conservation Values, and (b) natural habitat oriented education, research and other uses performed in a manner that does not disturb, alter or impair the Conservation Values. The "Conservation Values" shall mean the habitats on the property essential to maintaining various natural communities of sensitive, rare, and/or endangered plant and animal species, the enhanced connectivity between other nearby protected areas, parks, and/or watershed areas for wildlife, and the significant public benefit of preserving open space from development and providing protection for scenic qualities unique

to the area. However, the restrictions above shall not prohibit the construction of new unpaved multi-use trails that connect to a system of regional public trails. Furthermore, per Grant Agreement R81762-0, the Grantee (i.e., County) shall provide public access to the Preserve in accordance with the intent of the CA Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Proposition 50).

Consistent with the documents described above and as approved in the MND for the Project, Old Survey Road 97 is currently open to the public through docent-led tours at appropriate times of the year to avoid impacts to golden eagle. The County proposes to allow the public access to the trail on one extra day each week and to remove the requirement for docent led tours. The existing trail will be used and there will be no new impacts to habitat. Use of the trail will only be allowed during the non-breeding season. This change will not conflict with the provisions in the deed restrictions and conservation easements associated with the federal and state grants used to acquire the Preserve for the reasons that follow and that are found in the CEQA Guidelines Section 15162 Findings, attached hereto and incorporated herein by reference.

Current Golden Eagle Study Results

The Wildlife Agencies expressed their concern during the 2012 public comment period on the MND that opening Old Survey Road 97 could result in disturbance of normal foraging activity and/or adverse impacts to the nesting success of golden eagles in Bandy Canyon. However, as described below, substantial evidence has been collected by the County and the United States Geological Survey (USGS) over the past five years (since the adoption of the MND) that demonstrates golden eagles have successfully foraged and nested near anthropogenic activity associated with the Preserve, including the use of Old Survey Road 97, as well as other developments and recreational facilities in the general vicinity of the golden eagle nest.

As allowed by the aforementioned provisions in the deed restrictions and conservation easements, and as approved in the MND, Old Survey Road 97 was open for docent-led hiking, biking and horseback riding in 2015, 2016 and 2017. During that time, a three-year raptor study (September 2013 through August 2016) by DPR was concurrently taking place to collect baseline information on eagle and other raptor activity at the Preserve. Baseline information provided a better understanding of raptor species abundance and distribution within the Preserve, provided useful tools for informing future management decisions (e.g., trail feasibility and alignments, seasonal closures, etc.), and provided reference points for any future studies or assessments pertaining to public use. The study included Preserve-wide raptor foraging surveys and golden eagle nest monitoring in Bandy Canyon using spotting scopes and heat maps to determine where the eagles were actively foraging and perching. During the study, golden eagles were detected on the Preserve year-round with the highest density of observations occurring in the northwest portion of the Preserve. Golden eagles were also observed foraging in the southwest portion of the Preserve where trails are open to the general public. Observations during the surveys of the off-site golden eagle nest in Bandy Canyon included nest building activity in January 2016 and a golden eagle incubating eggs on the nest in March 2016. These observations were made after a total of 177 people used Old Survey Road 97 between October 3, 2015 and January 2, 2016.[2]

[2] For the first year of docent-led tours, DPR defaulted to the golden eagle non-breeding season dates in the Ramona Grasslands Preserve Resource Management Plan, which were August 1 to December 31.

A total of 99 people used the same trail between October 1 and November 26, 2016. Then on February 10, 2017 DPR staff observed a golden eagle on the nest, which was subsequently observed on the nest throughout the remainder of the 2017 nesting season.

In 2017, a total of 108 people used Old Survey Road 97 between September 2 and November 18. Regardless of human presence during the non-breeding season, USGS reported to DPR staff on February 21, 2018 that they observed the Bandy Canyon golden eagle pair incubating on the nest.

According to the results of the three-year raptor study described above, raptors, including eagles, were utilizing the Preserve for foraging, despite the presence of human activity. Specifically, foraging in the Preserve is not deterred by daily use of trails in the southwest portion of the Preserve or by the docent-led tours implemented along Old Survey Road 97 in 2015 and 2016. Also noted during the three-year raptor study is that eagle foraging is not affected by the use of the Preserve for cattle grazing, including frequent visits by the cattle rancher, maintenance activities by DPR staff, or by the use of the Ramona Airport**.**

Through the County's Targeted Monitoring Plan, monitoring of foraging behavior of golden eagles throughout the Preserve and monitoring of the off-site golden eagle nest will continue.

From a regional perspective, USGS telemetry data of golden eagles throughout San Diego County show that the eagles are currently active near recreational areas open for public use, including trails on Barnett Ranch, Otay Lakes, Tijuana River Valley Regional Park, Blue Sky Ecological Reserve, Iron Mountain, Mount Woodson, Boden Canyon Ecological Reserve, Hauser Mountain Wilderness, Cleveland National Forest, and highly developed areas such as the community of Ramona. Opening the trail without docent led tours and one more day during the week will not impact golden eagle movement over the northwest portion of the Preserve. The County will continue partnering with USGS regarding the County-wide telemetry study and nest occupancy surveys.

Based on the results of the 3-year raptor study and the data collected by USGS, it can be concluded that opening Old Survey Road 97 for hiking, biking and horseback riding during the golden eagle non-breeding season (as adopted in the MND), with one extra day each week and without docent led tours would not result in new significant impacts to golden eagle. Specifically, golden eagle foraging on the Preserve will not be affected because studies show local eagles are habituated to human activity and continue to forage over populated areas. Breeding/nesting eagles in Bandy Canyon will not be affected because the trail will only be open during the non-breeding season. To ensure potential impacts to golden eagles remain less than significant, DPR will continue to implement the following measures from the Ramona Grasslands Preserve RMP, specific to golden eagles (with revisions made in strikeout and underline):

- **Implementation Measure A.4.17:** DPR will annually conduct qualitative surveys for golden eagle, noting the location and number of individuals.

- **Implementation Measure A.4.18:** DPR will monitor trail use within the grasslands, including during peak use times. This data will be used to determine if and where seasonal closures of trails will be necessary to avoid impacts on golden eagles.

- **Implementation Measure A.4.19:** DPR will provide information to nearby residents about the potential harm to golden eagles from the poisoning of ground squirrels and gophers.

- **Implementation Measure A.4.20**: DPR will permanently close and passively restore the southern portion of an existing trail that occurs within 0.5 mile of a known nest location in the NW portion of the Preserve to prevent human disturbance to potential golden eagle nesting. (This is in reference to the southern portion of Old Survey Road 97 in the very northwest portion of the property)

Minimize indirect impacts to golden eagles as described in the implementation measures below:

- ~~**Implementation Measure A.4.21:** There will be on-going monitoring and adaptive management of the Preserve to facilitate docent-led tours, when appropriate, of Old Survey Road 97 in the NW portion (Not currently valid). The County DPR or other entities responsible for regional monitoring will conduct annual surveys of known offsite nest locations to determine occupancy during the breeding period (December through June).~~

- **Implementation Measure A.4.22:** DPR will place signage stating “Sensitive Habitat” to deter off-trail use along the trails in the NW portion of the Preserve.

- **Implementation Measure A.4.23:** DPR will plant cactus thickets along the portions of the trail within the NW portion of the Preserve closest to the known off-site nesting location of golden eagles to deter off-trail use.

In addition, as documented in the environmental findings for this project, no new significant impacts will occur as a result of this project. However, measures to ensure that no impacts to golden eagle will occur have been incorporated into the project and include the following:

Implementation of seasonal closure of the proposed trail (November 16 – August 14), closure and passive restoration of the southern spur of Old Survey Road 97 nearest the eagle nest site, discouraging off-trail activities that would bring trail users close to the off-site golden eagle nest, educational signage and ranger presence, continued maintenance to control the spread of invasive species within the Preserve and enhancing foraging habitat within the Preserve.

Before trail users are allowed on the proposed trail, they will be required to watch an educational training video through the County Learning Management System. Information regarding the training will be posted in the kiosk located in the staging area in the southwest portion of the Preserve and on the gate located at Rangeland Road in the northwest portion of the Preserve. This training will discuss the sensitive resources in the northwest portion of the Preserve including golden eagle. Discussion of golden eagle will include key information including how to identify the bird, distribution throughout the state and County, habitats where the bird resides, prey base, behavior traits and why this bird is considered sensitive. The trail user will take an exam at the end of the training and a permit will be given if the exam is passed. The trail user will then take the permit with them when using the trail. County staff will be accessing the trail periodically asking trail users to produce the educational training permit. If the trail user does not have a permit then the County staff person will ask the trail user to

come back when the on-line training has been completed. The permit will be valid for one “trail season” (August 15 – November 15) each year.

Lastly, the off-site golden eagle nest is situated in an open space easement dedicated to the County. This easement is for the protection of biological resources and gives the County authority to prohibit access to and within the easement to ensure the terms and conditions of the easement are not violated allowing for the protection of the golden eagle nest and the golden eagle pair. In addition, the open space easement authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purpose of species and habitat conservation. Management activities including placement of signs, ranger patrols and educational outreach to adjacent land owners and hiking/biking/equestrian/ rock climbing communities have already been implemented to ensure potential trespassers are aware of the risks and environmental issues.