

Wildlife and Habitat Conservation Coalition

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

April 30, 2019

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



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

Dear Ms. Tylke:

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

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

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

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

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

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

Sincerely,



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

cc: Deborah Mosley, Chief of Resource Management, County of San Diego, Parks and Recreation
David De Vries, City Planner, City of Poway
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Karen Goebel, Assistant Field Supervisor, USFWS

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August 16, 2018

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

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

Dear Ms. Mosley:

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

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

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

Key Planning/Permit, Management and Resource Documents

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

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

- County Biological Mitigation Ordinance (BMO) <https://www.sandiegocounty.gov/content/sdc/pds/mscp/bmo.html>;
- County's 2013 RMP for the Preserve and resources reports (scroll to "Sycamore" at link) <https://www.sandiegocounty.gov/content/sdc/parks/openspace/RMP.html#ElMonte>;
- Wu and Cielo resources reports;
- MSCP (CBI) Corridor Analysis <https://d2k78bk4kdhbpr.cloudfront.net/media/reports/files/Corridors2003.pdf>;
- MSCP (USGS) Corridor Analysis https://sdmmp.com/upload/SDMMP_Repository/0/4pg3yx71zvr06qb9snkth25fmjw8.pdf;
- San Diego Tracking Team (SDTT) data reports; and
- 1996 City of Poway HCP - <https://poway.org/323/Planning-Reference-Documents>.

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

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

Comments on and Recommendations for the PAP Trail Segments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Comments Relevant to Determining Trail Acceptability

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

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

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

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

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

Sincerely,



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contactecosd@gmail.com

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

ATTACHMENT 1

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

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

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

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

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

Movement and Corridors: The project would interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The following information should be evaluated to provide evidence to support a determination of impact significance.

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

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

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

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

Key criteria in the BMO pertaining to project impacts to BRCAs and corridors follow.

SEC. 86.505. PROJECT DESIGN CRITERIA.

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

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

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

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

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

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

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

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

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

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

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

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

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

The Preserve is located within the Metro-Lakeside-Jamul Segment of the MSCP SAP and is located within an area of the Central Poway/San Vicente Reservoir/North Poway Core Biological Resource Area. page 9

Per the MSCP, BRCAs are defined as generally supporting a high concentration of sensitive biological resources, which, if lost or fragmented, could not be replaced or mitigated elsewhere. page 85

According to the MSCP Habitat Evaluation Model, the majority of the habitat within the Preserve is rated as very high to high value with some smaller disturbed areas rated as medium to low in value. page 85

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

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

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

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

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

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

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

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

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

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

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

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

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

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

traditional tribal territory this Preserve exists.

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

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

County MSCP Subarea Plan

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

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

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

Key Findings in the Corridor/Linkage Reports

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

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

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

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

Poway Habitat Conservation Plan – excerpts.

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

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

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

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

6.2.1 Compatible Land Uses

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

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

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

Mountain Biking (p. 6-28)

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

Mountain Biking (p. 6-31)

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

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

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

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

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

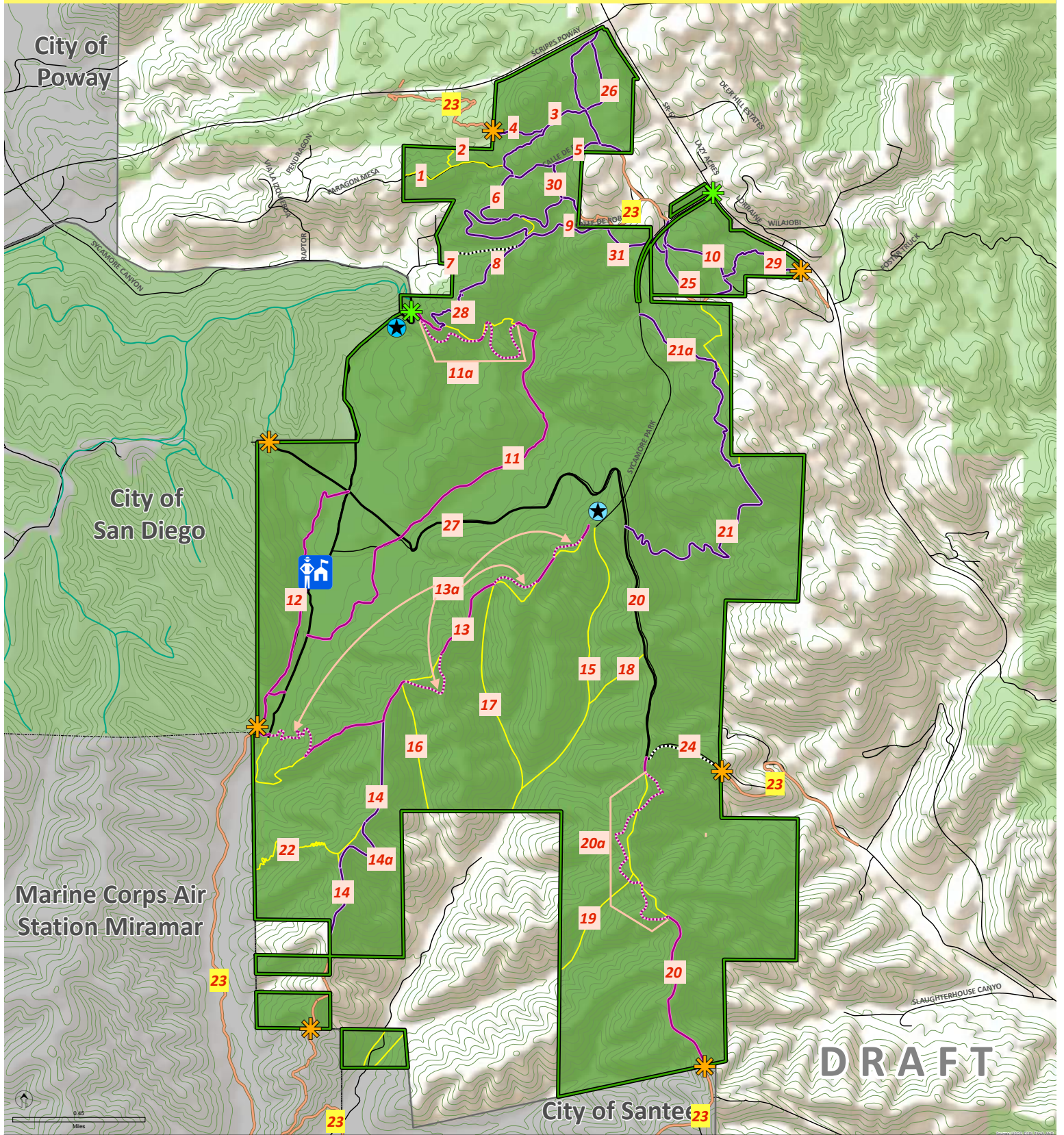
A similar schedule would be used in studying the use of the wildlife undercrossing. A combination of tracking media will be used in the tunnel to determine the frequency of animals entering and traversing the tunnel. Species will be identified by their tracks in raked dirt, sifted chalk dust, or other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

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

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

DRAFT PUBLIC ACCESS PLAN SYCAMORE/GOODAN RANCH

ATTACHMENT 2 Environmental Groups' Recommendations for the PAP Trails 8-16-2018



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Location Map

- Sycamore Canyon/Goodan Ranch Preserve
- Incorporated Cities
- Conserved Lands
- Ranger Station
- Staging Area
- Park Entrance
- Multi Use Trail Access
- Trail System**
- City of San Diego
- West Sycamore Trails
- Draft Proposed Trail
- Formal Trail to Remain
- Re-routed Formal Trail
- Road/Trail
- Maintenance Road
- Off Site Trail - Desirable
- Closed - To be Restored



Date: 10/31/2017
 File Path: P:\parks\MXD\17\17_10_sycamore_presentation.mxd
 THIS MAP/DATA IS PROVIDED WITHOUT WARRANTY OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING BUT NOT LIMITED TO, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.