



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Jul 31 2020

STATE CLEARINGHOUSE

Ms. Lorrie Bradley
 Project Manager
 County of San Diego, Department of Parks and Recreation
 5500 Overland Avenue, Suite 410
 San Diego, CA 92123
Lorrie.Bradley@sdcounty.ca.gov

**Subject: BOULDER OAKS IMPROVEMENT PROJECT (Project)
 REVISED DRAFT MITIGATED NEGATIVE DECLARATION (Revised DMND)
 SCH #2019099033**

Dear Ms. Bradley:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a revised DMND (RDMND) from the County of San Diego for the above Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

CDFW also administers the Natural Community Conservation Planning (NCCP) program. The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), which was approved by CDFW in 1997.

PROJECT DESCRIPTION SUMMARY

The County requests review of the Wildfire section of the RDMND and related project improvements map (Project Map), the supplemental Fire Services Operational Assessment (Appendix F) (Rohde 2020), and the Wildfire Site Evacuation Plan (Appendix G) (County 2020). CDFW understands that this information was released for public review in response to comments received from the circulation of the DMND and recent court decisions on wildfire analysis. CDFW acknowledges the County's request that reviewers limit their comments to the revised chapters or portions of the recirculated DMND only and that comments submitted during the DMND circulation period (September 12 through October 16, 2019 for the DMND) will be responded to as part of the Final MND (FMND) along with any comments received for this Revised DMND.

Location & Regional Planning Setting: The Boulder Oaks Improvement Project (Project), will take place on the County Department of Parks and Recreation's Boulder Oaks Preserve (Preserve). The 2,014-acre Preserve is located just west of Mussey Grade Road near the unincorporated community of Ramona. The Project site was considered Pre-Approved Mitigation Area but is now 100% conserved under the County MSCP SAP and is being used to fulfill MSCP conservation obligations. The goal of the

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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MSCP is to maintain and enhance biological diversity in the region and conserve viable populations of sensitive species. The Preserve has been closed to the public since acquisition by the County and the RDMND and other CEQA documents have been written in support of opening the Preserve to public day use.

COMMENTS AND RECOMMENDATIONS

The Department offers the following **Comments and Recommendations** to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources; and to improve the overall analysis with relation to NCCP requirements. The County MSCP Subarea Plan (SAP) (County 1997), Preserve Trail Guidelines (County 2018), and Boulder Oaks Area Specific Management Directives (ASMDs) (County 2008) serve as the guiding documents for Preserve management and monitoring. Currently the ASMDs serve in lieu of a Resource Management Plan (RMP) for the Preserve. The current adopted ASMDs were originally developed for the southern 1,268 acres of the Preserve (acquired by the County in 2003) but may be applicable to the remaining portion of the Project if all MSCP species/concerns have been addressed.

This third letter follows two previous letters that were written to address County planning on the Boulder Oaks property. Because the RDMND builds off previous CEQA efforts which have not yet been adopted, or fully resolved from CDFW's perspective, CDFW is concerned that potential impacts to biological resources cannot be fully resolved for the proposed wildfire safety elements. Until the underlying trails plan is resolved and avoidance and mitigation has been determined, CDFW is concerned that the project may be inconsistent with some elements of the NCCP guiding documents listed above, particularly with regard to current trail placement shown on the RDMND Project Map. In September 2019, CDFW submitted comments in response to the originally circulated DMND, and in October 2018 CDFW commented on an anticipated update of the Resource Management Plan (RMP) (currently written as the Final Area Specific Management Directives for Boulder Oaks Open Space Preserve (ASMD 2008)).

For the purposes of the current CEQA public review for the RDMND, CDFW recommends that Project impacts to biological resources from fire safety be identified, disclosed, analyzed, and avoided or mitigated in the draft CEQA documents. New impacts from the RDMND Appendix F (Rohde 2020) include but are not limited to:

1. *potential new helispots for helicopter landings (Page 10);*
2. *use of ponds to gather water for fire suppression (Page 20);*
3. *potential for new fire breaks including those created using bulldozers (Page 7 and 21) and/or hand tools by large (potentially ecologically inexperienced) fire crews (Pages 7, 15 and 21);*
4. *potential for prescribed burning (Page 9); and,*
5. *the need for selected "key trails" to be drivable/widened for fire equipment passage.*

In addition, proposed fire safety features and other Project Map features have not been updated to be more consistent with the County's Preserve Trail Guidelines (County 2018), the existing ASMD (County 2008) document, and the MSCP SAP (County 1997). We recommend the Project be revised further pursuant to our 2018 letter and to be consistent with the sections listed below.

1. Amend the Project to be consistent with Preserve Trail Guidelines on page 5 and further reduce the length and access areas of the proposed trails – particularly where they abut CDFW's San Vicente Highlands Open Space to the south and southeast and bisect large contiguous areas of open space which support secretive covered species (CDFW 2020). Please also provide graphics of overlapping project features with sensitive habitat and species which support impact analysis:

While continuing to provide opportunities for public access to preserve lands, trail alignments will avoid or be rerouted away from the most sensitive areas within a preserve. Allowing controlled access to sensitive ecological areas is an integral part of educating the public about the value of resource protection. Most often, this takes the form of routing a trail on the periphery of a sensitive area with adequate buffers and allowing direct access to only in very select locations...[a]ll trail development must be consistent with the Preserve's Resource Management Plan.

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2. San Diego's expanding population is expected to produce increased demand for outdoor recreational opportunities and amenities; therefore, it is important at this time to be consistent with ASMD, Section # 5.2: Management Policies and Priorities as follows:

The priority of the ASMD is summarized as follows: The Preserve shall be managed for its biological and cultural resource values and for its public use benefits. Where conflicts between resource management and public access arise, the biological and cultural resources should be avoided whenever practicable. If impacts are required, adequate mitigation shall be provided.

3. ASMD Section 5.3.3, pg 44:Tasks Priority 2 which states:

Access to aquatic habitat within the Preserve should be restricted. To restrict access, trails should be signed stating that users are to stay on the trail and not impact the sensitive resources in and adjacent to the aquatic areas.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

CONCLUSION

In summary, CDFW recognizes the need to prioritize public safety and the primary goals of supporting MSCP covered species and the County's desire to provide MSCP compatible, passive recreational opportunities to the public. Prior CDFW letters asked for revisions to trail areas 1 and 2 and the need to limit access to the southern pond area. CDFW acknowledges and thanks the County for removing a short segment of trail #2, which connects west into CDFW's San Vicente Highlands Open Space. CDFW believes additional detail is required to disclose, assess, avoid and mitigate project features, including for fire safety, and again recommends avoidance of large intact areas of the Preserve. CDFW also strongly recommends against encircling or inhibiting wildlife access to the southern pond area which is expected to be especially important for numerous covered species.

CDFW appreciates the opportunity to comment on the Revised DMND and continues to look forward to resolving Project-related concerns with County staff prior to opening public access of the Preserve. Questions regarding this letter and further coordination on these issues should be directed to Holly Smit Kicklighter, Senior Environmental Scientist, at holly.smitkicklighter@wildlife.ca.gov.

Sincerely,

DocuSigned by:


David Mayer

Environmental Program Manager
South Coast Region

Enclosures

- A. October 19, 2019, CDFW letter on Boulder Oaks Improvement Project draft MND
- B. September 2018, CDFW letter on RMP Update

ec: Office of Planning and Research, State Clearinghouse, Sacramento
Susan Wynn, U.S. Fish and Wildlife Service, Carlsbad Field Office

REFERENCES

1997. MSCP County of San Diego Subarea Plan. San Diego County. 1997

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2008. Final Area Specific Management Directives for Boulder Oaks Open Space Preserve. San Diego County. 65 pp.

2018. Preserve Trail Guidelines, Department of Parks and Recreation. San Diego County. 32 pp.

2019. Draft Mitigated Negative Declaration (with Appendices) for Boulder Oaks Improvement Project. San Diego County. 653 pp.

2020. CDFW Journal. Special Issue, Effects of Non-consumptive Recreation on Wildlife in California. State of California. 128 pp.

2020. Revised Draft Mitigated Negative Declaration for the Boulder Oaks Preserve Improvement Project, Section XX (Wildfire). San Diego County. 7 pp.

2020. Draft Boulder Oaks Preserve Site Evacuation Plan and Fire Safety Plan (Revised DMND Appendix G). San Diego County. 23 pp.

2020. Boulder Oaks Preserve Improvement Project Fire Services Operational Assessment (Revised DMND Appendix F). Rohde & Associates. 26 pp.



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October 14, 2019

Ms. Lorrie Bradley
County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

**Subject: Draft Boulder Oaks Improvement Project Mitigated Negative Declaration,
County of San Diego, California**

Dear Ms. Bradley:

The California Department of Fish and Wildlife (Department) has reviewed the draft Mitigated Negative Declaration (MND) for the Boulder Oaks Improvement Project (Project), proposed to take place on the County of San Diego's (County) Department of Parks and Recreation's Boulder Oaks Preserve (Preserve). The 2,014-acre Preserve is located just west of Mussey Grade Road near the unincorporated community of Ramona. Currently, the entire Preserve is considered Pre-Approved Mitigation Area under the County Multiple Species Conservation Program (MSCP) subarea plan and is being used to fulfill MSCP conservation obligations. The Preserve has been closed to the public since acquisition by the County. The Project proposes improvements to the Preserve in preparation of opening the Preserve to the public.

In September 2018, the Department proactively provided a comment letter in anticipation of the Project and associated CEQA-related documents (attached). This comment letter reiterated and formalized verbal comments previously provided to County DPR during several pre-Project coordination meetings and provided pre-CEQA avoidance and/or minimization measures/recommendations for sensitive natural resources that may be directly or indirectly impacted by implementation of the Project. The MND does not provide a demonstration that the County has taken into consideration a number of concerns and recommendations highlighted in the Department's September 2018 letter. In particular, trails #1 and #2 remain proposed for development, potential impacts associated with the "existing" trails on the property have not been analyzed or addressed in the proposed mitigation, and no trail realignment near the southern pond has occurred. Additionally, the County proposes updates to the existing Resource Management Plan for the Preserve; however, this updated document was not analyzed in or circulated concurrent with the MND.

The September 2018 letter has been attached for the County's review. The Department appreciates the opportunity to review the MND and looks forward to resolving Project-related concerns with County staff prior to opening public access of the Preserve. Questions regarding this letter and further coordination on these issues should be directed to Carol Williams at (858) 637-5511 or Carol.Williams@wildlife.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads 'David A. Mayer'.

for Gail K. Sevens
Environmental Program Manager

ec: David Mayer, CDFW



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September 14, 2018

Ms. Deborah Mosley
Chief, Resource Management Division
County of San Diego, Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123

Attention: Lorrie Bradley (lorrie.bradley@sdcounty.ca.gov)

Subject: Draft Resource Management Plan for Boulder Oaks Preserve, County of San Diego, California

Dear Ms. Mosley:

The California Department of Fish and Wildlife (Department) have reviewed various documents written by or for the County Department of Parks and Recreation (County DPR) in support of a draft Resource Management Plan (RMP) for the Boulder Oaks Preserve (Preserve). These documents are listed under References at the end of this letter. In addition, preparation of the draft RMP, which includes a public access component, has been discussed at monthly coordination meetings held among staff from County DPR, the Department, and the U.S. Fish and Wildlife Service (Service) in October 2015, March, April, and July 2016, September 2017, and August 2018. Currently, the Preserve is closed to the public; therefore, the Area Specific Management Directives for the Preserve (County DPR 2009) has been the guidance document for Preserve management and monitoring. Prior to opening the Preserve to public access, the County must finalize an RMP for the Preserve including a formalized Trail Plan. To support this effort, the County has held at least two public workshops, one in 2016 and one in 2017, where a proposed Trail Plan was presented for public comment/input. It is the Department's understanding that the County also intends to circulate the draft RMP/Trail Plan for public review through a formal California Environmental Quality Act (CEQA) process.

The 2,015-acre Preserve is located just west of Mussey Grade Road with portions bordering City of Poway Iron Mountain Open Space, the Department-owned, managed and undesignated San Vicente Highlands, and City of San Diego San Vicente Reservoir Multiple Species Conservation Program (MSCP) Cornerstone Lands. County DPR acquired the southern 1,268-acre portion of the Preserve in 2003 for inclusion in the County MSCP preserve system. The remaining 747.8 acres were acquired in 2012. Currently, the entire Preserve is considered Pre-Approved Mitigation Area (PAMA) under the County MSCP subarea plan and is being used to fulfill MSCP conservation obligations. The overarching goal of the MSCP is to maintain and enhance biological diversity in the region and conserve viable populations of sensitive species. Important biological resources found in the Preserve include coast live oak and Engelmann oak woodlands, rock vernal pools, Orcutt's brodiaea (*Brodiaea orcuttii*), Engelmann oak (*Quercus engelmannii*), and coast horned lizard (*Phrynosoma coronatum*). In addition, mule deer (*Odocoileus hemionus*) are common on the Preserve and provide an important prey base for the regionally declining mountain lion (*Puma concolor*), which has also been detected in the Preserve. Although not documented by the baseline studies, the entire Preserve is within the foraging area/territory of GOEG-SD-F001, a golden eagle (*Aquila chrysaetos*) female that was captured and fitted with a GPS transmitter by U.S. Geological Survey staff in 2014 (Tracey et al.

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2016, 2017). Species documented within the Preserve that are covered under the County MSCP subarea plan include Orcutt's brodiaea, heart-leaf pitcher sage (*Lepechinia cardiophylla*), felt-leaf monardella (*Monardella hypoleuca* ssp. *lanata*), coast horned lizard, Cooper's hawk (*Accipiter cooperii*), western bluebird (*Sialia mexicana*), rufous-crowned sparrow (*Aimophila ruficeps*), mule deer, and mountain lion.

As stated above, the County has not submitted any CEQA-related documents or a draft RMP for Department review. Instead the Department is submitting this letter to 1) formalize verbal comments provided to County DPR during the coordination meetings listed above, and 2) to provide pre-CEQA avoidance and/or minimization measures/recommendations for sensitive natural resources that may be directly or indirectly impacted by implementation of the finalized RMP/Trail Plan.

A. RMP/Trail Plan

1. As the Department has emphasized at coordination meetings regarding RMPs, County Preserves support important sensitive biological resources, and many provide key areas for wildlife movement and connectivity within the broader MSCP subregional planning area. Maintaining the biological resources within these Preserves and habitat connectivity to adjacent open space areas are essential to ensure the continued coverage for plants and animals provided under the County MSCP subarea plan. This is also true for the Preserve, which is embedded within a large complex of open space lands that currently experience low to moderate authorized public use. Although it is the County's intent to design a trails plan for "low intensity" use, open space areas throughout the County are experiencing significant increases in public use. Therefore, once the Preserve is open to the public, management and monitoring of the public use patterns of the Trail Plan are essential to the long-term function of the Preserve for biological resources and compatible public access. The RMP needs to identify specific commitments to fund management of natural resources (i.e., natural habitats, native flora and fauna and particularly sensitive species) so they will not be adversely affected by establishing or expanding proposed recreational elements within the Preserve. No new trails (including infrastructure), new trail uses, or increases in public use should be approved if County DPR is unable to implement monitoring and management actions to protect on-site species and habitats. To better address the conservation needs and threats to the existing resources, the RMP should also ensure that the necessary funding for patrols will be available once the Preserve is open to the public.
2. As the Department has previously expressed, a key element of all RMPs should include goals and measurable objectives using "SMART" criteria (i.e., Specific, Measurable, Achievable, Results-oriented, and Time-fixed), and identify what actions or tasks will be implemented, and when, to meet the objectives. The results of these actions should be incorporated into adaptive management strategies for vegetation communities/species covered under the County MSCP subarea plan or considered regionally rare. These types of goals and measurable objectives should also be identified for the recreation component of the RMP.

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3. A primary goal of the RMP should be to ensure that some portion of the conserved lands matrix on the western and southern sides of the Preserve (i.e., Preserve, San Vicente Highlands, and Iron Mountain Preserve) support areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, and mountain lion foraging areas. This is also important for species that are especially sensitive to urban edge such as the golden eagle (Tracey et al. 2018). Therefore, the Department recommends that the Trail Plan presented at the September 18, 2017, public meeting and to the Department at the August 9, 2018, coordination meeting be revised (Attachment 1). More specifically, the Department recommends that proposed trail #1, as labeled on Attachment 1, be removed. This will allow the western portion of the Preserve to remain relatively free of human intrusion, aiding wildlife movement between the Preserve and adjacent open space areas to the west and south.
4. Based on a comparison of the Trail Plan and Figure 4 (Biological Resources) from the 2007 biological baseline evaluation, proposed trail #2 (again see Attachment 1) appears to travel through or near rock vernal pool habitat, a unique and special-status seasonal wetland community. The Department understands that this trail was added to provide a loop trail experience, but another loop trail was also added in the southeastern section of the Preserve, in an area that does not appear to support sensitive resources directly adjacent to the trail alignment. Therefore, to minimize disturbance to the unique boulder/rock vernal pool habitat, the Department recommends that proposed trail #2 end in the general vicinity of the point added to the Attachment and connected back to the "existing" trail. This would also minimize human intrusion into the large core habitat area in the western portion of the Preserve. If County DPR authorizes trail use in this area, then at a minimum, the Department requests that all trail alignments be at least 100 feet from rock vernal pool resources. If informal trails to these rock features begin to form, we recommend County DPR install split rail fencing in key locations to encourage users to stay on designated trails and that the County provide enforcement.
5. Considering the previous comment, the graphic information in the biological baseline reports and eventual RMP would be more helpful if the biological resources (i.e., sensitive plants and wildlife) and proposed trails were included on one map. We recommend this be included in the public access plan/trails compatibility analysis and the draft RMP.
6. The Preserve supports two ponds that provide year-round water sources for wildlife. Although one pond is located adjacent to the Ranger residence, the other appears to be located away from current development. As stated in the 2007 biological baseline evaluation, open water has "high ecological value as it provides nesting and foraging habitat for several wildlife species" (p. 40). In general, it is also likely an important source of water for many wildlife species living on the Preserve. The trail plan depicts a loop trail in close proximity to three sides of this pond. The Department requests that County DPR consider a trail alignment that borders only one side of the pond (e.g., northern alignment or southern alignment) and the alignment be set back at least 100 feet from the pond edge. In addition, prior to opening the Preserve to the public, the Department recommends that 1-2 wildlife cameras be deployed to document if wildlife are currently

Ms. Deborah Mosley, Chief, Resource Management Division
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relying on this pond for water. This will provide additional baseline information that may help determine a less impactful trail alignment and that can be compared to data collected after the trail is open to the public.

The Department commends the County for the numerous trails that have been identified as "Trail Closures" as it is our understanding that many of them are "informal/unauthorized" trails. In addition, the Department would also like to acknowledge that County DPR has agreed to install the gate, as identified on Attachment A, to deter trail users from entering the Department-owned San Vicente Highlands, which is currently closed to the public. The Department recommends the legend for the Trail Plan be revised. The legend should not depict "existing" trails as the Preserve is not currently open to the public. The term "existing trails" should only apply to those segments that were developed consistent with existing planning and development guidelines (e.g., MSCP tenets for trail design) analyzed in a previous CEQA document, and whose impacts to habitat were avoided, minimized, and/or mitigated. "Unauthorized trails" in native habitat are paths that have been used/established over time and whose direct and indirect impacts to natural resources have not been analyzed under CEQA nor mitigated for in any way. Therefore, these unauthorized impacts to habitat may not have been accounted for, especially in the Preserve. Inclusion of these paths in the RMP as "existing" formalizes them without analyzing or accounting for the original habitat impacts. To the extent feasible, the RMP should include discussion of the origin of the trails, and whether habitat loss resulting from these segments was analyzed and/or addressed in a CEQA document or other planning document. The RMP should further analyze the extent that existing trails minimize resource impacts, and where appropriate, should be realigned to minimize resource impacts and avoid redundancy. Mitigation should be proposed for all unauthorized trails that are now included as part of the RMP trail system.

7. Please clarify the difference between "unvalidated trail" and "informal trail" as depicted on the Existing Formal and Informal Trails slide presented during the September 18, 2017, public workshop.

B. Draft Vegetation Management Plan

8. The Department supports implementation of the draft Vegetation Management Plan, especially the recommendation to "Conduct Preserve surveys twice per year, once in the early spring and once in the fall, to determine the presence and extent of invasive non-native plant species on the Preserve, including treated areas" (p. 7-1). This recommendation and others in the document are consistent with previous Department recommendations to implement an invasive species management program that relies on an Early Detection Rapid Response protocol. We also recommend these surveys include inspection of the oak woodland habitats for goldspotted oak borer (*Agrilus auroguttatus*), a serious invasive pest that continues to cause oak tree mortality within the southern California landscape.

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Questions regarding this letter and further coordination on these issues should be directed to Christine Beck at (858) 637-7188 or Christine.beck@wildlife.ca.gov.

Sincerely,



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

ec: Doreen Stadtlander, U.S. Fish and Wildlife Service, Carlsbad
David Mayer, CDFW

References:

County of Department of Parks and Recreation (DPR).

2017. Boulder Oaks Preserve Public Access Plan presentation presented at a public workshop held on September 8, 2017.

2008. Draft Area Specific Management Directives for Boulder Oaks Open Space Preserve San Diego County. 55 pp. + Technical Appendices.

2008. Final Area Specific Management Directives for Boulder Oaks Open Space Preserve San Diego County. 65 pp.

ICF International. 2013. Baseline Biodiversity Report Boulder Oaks Preserve. Prepared for County of San Diego, December 2013.

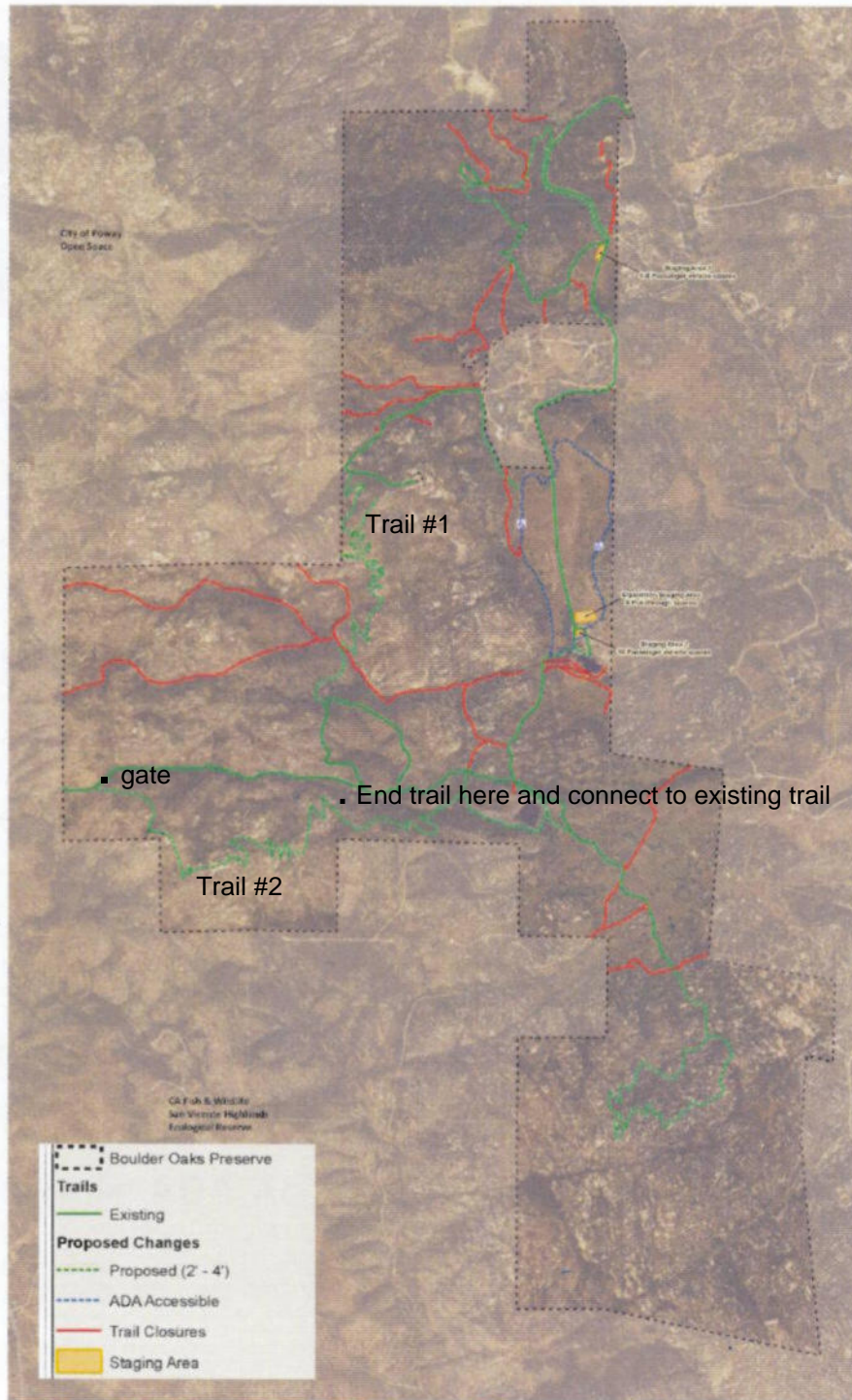
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Tracey, J. A., M. C. Madden, J. B. Sebes, P. H. Bloom, T. E. Katzner, and R. N. Fisher. 2016. Biotelemetry data for golden eagles (*Aquila chrysaetos*) captured in coastal southern California, November 2014-February 2016: U.S. Geological Survey Data Series 994, 32 p., <http://dx.doi.org/10.3133/ds994>.

Tracey, J.A., M. C. Madden, J. B. Sebes, P. H. Bloom, T. E. Katzner, and R. N. Fisher. 2017. Biotelemetry data for golden eagles (*Aquila chrysaetos*) captured in coastal southern California, February 2016-February 2017: U.S. Geological Survey Data Series 1051, 35 p., <https://doi.org/10.3133/ds1051>.

Tracey, J.A., M. C. Madden, P. H. Bloom, T. E. Katzner, and R. N. Fisher. 2018. Golden eagle (*Aquila chrysaetos*) habitat selection as a function of land use and terrain, San Diego County, California: U.S. Geological Survey OpenFile Report 2018-1067, 13 p., <https://doi.org/10.3133/ofr20181067>.

Attachment 1



BOULDER OAKS TRAIL PLAN

Presented to Department on August 9, 2018 and during public workshop on September 8, 2017