



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 2, 2021

Governor's Office of Planning & Research

Apr 02 2021

Jeffrey Szymanski
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sandiego.gov

STATE CLEARINGHOUSE

Subject: City of San Diego Ruffin Canyon Open Space Trail (PROJECT) Project No. 658785, Mitigated Negative Declaration (MND), SCH #2021020476

Dear Mr. Szymanski:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the City of San Diego (CITY) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW and the United States Fish and Wildlife Service (USFWS), collectively known as the Wildlife Agencies, conducted previous coordination with the City regarding the Project with a field visit on April 12, 2019, and email correspondence on June 03, 2019 and September 9, 2019. A discussion concerning the Project also occurred at the March 19, 2021 Boundary Line Adjustment (BLA) meeting attended by the Wildlife Agencies and City staff.

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 (FGC).

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 submitting comments as 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

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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in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). The Multi-Habitat Preserve Area (MHPA) is the area from which a final hardline reserve becomes established in the City to adequately conserve covered species pursuant to the SAP.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego Parks and Recreation, Open Space Division

Objective: The Project includes the adoption of the Ruffin Canyon Open Space Trail Plan (Plan) which describes the expansion of an existing trail system. The adoption would provide a cohesive Plan for the Ruffin Canyon Open Space, provide connection between the Serra Mesa and Mission Valley communities, and provide guidance for the present/future use and maintenance of the trails within the Plan Area. Trails in this Plan are open to pedestrian and bicycle users. The Project will create a new alignment in the southern section of the canyon. Currently, local hikers use a sewer access path, as an existing City utility path occurs within the central portion of Ruffin Canyon and Shawn Canyon. According to the MND, this path does not serve as a safe and sustainable trail for public use due to erosion and flooding. In addition, the Project addresses the authorization of three existing trails within Ruffin Canyon. The Project consists of approximately 2,658 feet of new trail within Ruffin Canyon, heading south from the intersection of the existing Ruffin Canyon and Shawn Canyon trails. In addition to the new trail construction, the Project includes authorization of the existing trail located in the upper section of Ruffin Canyon.

Location: The Project is located in City of San Diego Open Space, in the Serra Mesa and Mission Valley communities of the City of San Diego, west of Interstate 15 (I-15), east of I-805, and north of I-8. It is loosely bounded by Gramercy Drive to the north, Friars Road to the south, Mission Village Drive to the east, and Murray Ridge Road to the west.

Biological Setting: The entire Project site is within the MHPA. The study area includes the trail alignment and existing trail plus 15 to 20 feet on each side of the trail, and supports 15 vegetation communities/habitats: freshwater marsh, alkali marsh, southern willow scrub, non-native riparian, mule fat scrub, Diegan coastal sage scrub (including disturbed), broom baccharis scrub, coastal sage-chaparral scrub, southern mixed chaparral, non-native grassland, non-vegetated channel, ornamental vegetation, disturbed habitat, and developed land. It also includes one ephemeral drainage that flows down the center of the canyon and is a tributary to the San Diego River.

Special status wildlife species identified on site include the Federal Endangered Species Act (FESA) threatened and MSCP covered coastal California gnatcatcher (*Poliioptila californica californica*), California Species of Special Concern and MSCP covered orange-throated whiptail (*Aspidoscelis hyperythra*). Three sensitive plant species were identified on site. These include the MSCP covered San Diego barrel cactus (*Ferocactus viridescens*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*; California Native Plant Society (CNPS) rare plant rank 4.2), and San Diego viguiera (*Bahiopsis laciniata*, CNPS 4.3).

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The Project will permanently impact the following MSCP identified vegetation types as a result of the trail realignment: Tier II Diegan coastal sage scrub (0.15 acre) and Tier III southern mixed chaparral (0.22 acre). Proposed mitigation includes payment into the City's Habitat Acquisition Fund (HAF) at a 1:1 ratio for permanent impacts within the MHPA. The Project does not propose compensatory mitigation for the northern section of the trail alignment, which the City has classified as a Category 1 existing trail.

Timeframe: A timeframe was not provided for the Project.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

I. Potential Impacts to MSCP Covered Species

COMMENT #1

Coastal California Gnatcatcher

Section: MND - Biological Resources IV (a), Ruffin Canyon Trail Biological Resources Letter Report (BRLR), Plan, **Pages:** 2 and 13, 9, and Figure 5, respectively.

Issue: The BRLR and Figure 5 of the Plan identify six Coastal California gnatcatcher (gnatcatcher) territories on site, as well as describe historic occupation of the site by gnatcatchers. The City' SAP requires avoidance of impacts to occupied gnatcatcher habitat within the MHPA during the breeding season (March 1 to August 15); however, the MND does not specify a mitigation measure to impose this MSCP requirement.

Recommended Mitigation Measure # CDFW-BIO-1a:

To reduce impacts to less than significant:

1. Prior to the issuance of any grading permit (for Public Utility Projects: prior to the preconstruction meeting), the City Manager (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the gnatcatcher are shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the gnatcatcher, unless the following requirements have been met to the satisfaction of the City Manager:

- A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the gnatcatcher. Surveys for the gnatcatcher shall be conducted

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pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:

Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and

- II. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or
- III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher.

II. MSCP Consistency

COMMENT #2

Potentially Significant Direct and Indirect Impacts to Riparian Resources and Sensitive Habitats in the MHPA

Section: MND-IV Biological Resources, BRLR-MSCP General Management Directives, Tables 2 and 3, Plan-Figure 3, **Pages:** 13, 11 and 16-18, 2 and 12 respectively

Issue: Neither the MND nor the BRLR identify the location and extent of jurisdictional wetland resources on site, although they are noted as present. The Project documents appear to be inconsistent in the treatment of the hydrologic feature that traverses the MHPA through Ruffin Canyon. The feature that the Project calls “existing Category 1 trails” in the northern section is the same feature that is identified as an “unvegetated streambed” in the southern portion of the Project area, due to increased erosion of fine sediment in the southern portion. Figure 3 of the Plan shows a blue line ephemeral drainage in what appears to be in the same alignment as the “existing trail” and sewer access road. Historic aerials from 1953 show that the alignment of the “existing trail” was an unvegetated channel feature, presumably until it was impacted in 1957 by placement of the sewer pipe. A wetland delineation is necessary to determine where jurisdictional areas occur in order to subsequently make decisions concerning avoidance and/or mitigation for direct impacts from trail development, as well as the need for ongoing impacts such as possible trimming of riparian vegetation. Resolution of impacts and mitigation may ultimately depend on development of a CDFW 1600 agreement.

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Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #CDFW-BIO-2a:

To reduce impacts to less than significant The MND and the Plan shall include a delineation of the jurisdictional features on site. Any direct impacts from future improvements to riparian resources, including unvegetated streambed, will be mitigated accordingly per the City's Biology Guidelines. A CDFW 1600 agreement may require additional mitigation measures.

Mitigation Measure #CDFW-BIO-2b:

In addition to mitigation of impacts consistent with the City's Biology Guidelines, CDFW recommends that a Notification be submitted to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code for any potential modification to the bed, bank, or channel of the streambed, which includes potential crossing structures and vegetation modification on the stream bank.

COMMENT #3

Potentially Significant Direct and Indirect Impacts to Covered Species in the MHPA

Section: BRLR-MSCP General Management Directives, Plan-Figure 5, **Pages:** 16-18

Issue: The Plan as described in the MND and BRLR do not fully consider the impacts of trail use on covered species.

Specific impacts: The BRLR makes the conclusion, "[u]se of the trails in the Plan is not anticipated to significantly alter noise levels in the canyon, which is in an urban environment, completely surrounded by development. Trail use is likely to be intermittent, and generally occurring at levels similar to the surrounding developed parcels." CDFW believes the official designation and improved quality of the trail system is likely to increase use by the public above current level of unauthorized use.

Why impact would occur: The Plan proposes to include bicycle use, and improvement of the trail is likely going to increase use by bicycles and hikers. Additionally, CDFW is concerned that bicycle speed on trails can be an issue for MSCP covered and/or sensitive species including the orange-throated whiptail. Research by Vandeman (2008) indicates that an increase in mortality of small vertebrates can be expected wherever mountain bikes are ridden. CDFW is concerned that increased bicycle use, and particularly bicycles traveling at moderate speeds, may impact sensitive species in Ruffin Canyon.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #CDFW-BIO-3a:

To reduce impacts to less than significant: CDFW recommends that the Plan address impacts from bicycle use by imposing and enforcing speed limits. In addition, the City is reminded of its responsibilities to monitor and prevent users from going off trail or creating new unauthorized trails.

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Mitigation Measure #CDFW-REC-3b:

In addition, CDFW recommends closing the northwestern finger canyon of the proposed existing trail as part of approval of the Plan, due to the presence of sensitive wetlands including alkali and freshwater marsh, and riparian resources and the presence of a gnatcatcher territory directly on the trail.

COMMENT #4

Adoption of Trails Plan Prior to Establishment of a Natural Resource Management Plan (NRMP) or Area Specific Site Directives (ASMDs)

Section: Plan (B). Purpose, (3) Trails, Public Use and Recreation Guidelines (6) Implementation, **Pages:** 5, 16, and 28 respectively

Issue: The Final Multiple Species Conservation Plan Section 6.3.1, City's Implementing Agreement Section 10.6 A and B, and the City's SAP, call for the creation of a NRMP or ASMD for preserved lands. The Project will implement a Trail Plan prior to the implementation of a NRMP. Although the Plan identifies the natural resources adjacent to the trail and provides good baseline information for biological resources within Ruffin Canyon, a NRMP would provide a more comprehensive approach to addressing threats, stressors, and management of the sensitive plants, animals, and habitats within the canyon. CDFW appreciates that there is presently strong demand from the public to access more undeveloped areas due to Covid restrictions. However, from a process standpoint and to ensure that the MSCP objectives take priority over competing interests, CDFW strongly recommends that providing for trails and public access not be completed in advance of an area-wide analysis addressing all considerations as performed for a NRMP. As proposed, the City would be in a very difficult, if not impossible, position of withdrawing access opportunities after they have been approved through this trails plan. The creation of a designated public trail may preclude or substantially complicate future management options of a NRMP for Ruffin Canyon.

Specific impacts: A trail plan and a NRMP have different objectives in that the NRMP manages all the resources within a given preserve area, and monitoring is performed at a frequency to ensure adaptive management is performed to recognize and address threats in a timely manner. Including the trail aspects within a NRMP ensures the trail is evaluated, and managed for, as part of the larger landscape. Implementing a trails plan in Ruffin Canyon without a NRMP in effect allows both direct and indirect impacts before that section of MHPA becomes fully integrated into the City's MSCP preserve. Although the Project would provide mitigation for the direct impacts to habitats, a more vigilant management and oversight of this section of MHPA is needed to protect against deleterious edge effects from trail use over time. Additionally, a NRMP would include adaptive management thresholds for threats to covered and sensitive species and their habitats.

The Plan only commits to annual visits, which are not sufficient to inform management issues and perform adaptive management actions in order to protect biological values. In such urban areas, issues such flooding closures, invasive species, and particularly unauthorized trail use require more active management than can be provided through annual visits. The Plan states, "[s]pecific trail alignments have not been identified for major closure efforts at the time of the development of this plan." The Plan discusses closing Sandrock Canyon to trail use due to sustainability issues but does not provide any further direction for this outcome. Once trail segments have been opened, it should be expected that non-open sections will also receive

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significant use and create a high level of expectation that sections will ultimately become open in the future. Monitoring and enforcement must be sufficient to protect these lands before they become officially added into the MSCP preserve. For this reason, CDFW again cautions against approving a trails plan in advance of an approved NRMP, and further requests a much higher level of commitment by the City to monitor resources and control against use of unauthorized areas.

Recommended Potentially Feasible Recommendations and Mitigation Measure(s)

Mitigation Measure # CDFW-REC-4a:

To reduce impacts: Prior to adopting a Trails Plan, CDFW recommends the City develop a NRMP or ASMDs for Ruffin and Sandrock canyons. Absent completion of a NRMP or ASMDs, CDFW further recommends that the City commit to a minimum of monthly monitoring visits throughout the Ruffin Canyon MHPA to protect against adverse effects from recreational uses along or peripheral to the newly authorized trails.

Mitigation Measure # CDFW-BIO-4b:

To reduce impacts: If a Natural Resources Management Plan (NRMP) is not developed per MSCP guidance, in lieu of a NMRP, the Plan shall describe appropriate procedures for trails closure, including signage for sections of unauthorized trails that are not being designated by the Plan.

III. Mitigation

COMMENT #5

Proposed Use of Habitat Acquisition Fund (HAF)

Section: MND Biological Resources, **Page:**13

Issue: The MND proposes to pay into the HAF to mitigate for impacts to sensitive habitats. Although the HAF provides a fast solution for the City to demonstrate mitigation for the Project impacts, CDFW believes that the impacts, especially the indirect impacts as discussed above, would be far better served by employing habitat restoration and enhancement within Ruffin Canyon. CDFW further notes that the City's Biology Guidelines (page 50) state that the HAF "is intended to be used only for the mitigation of impacts to small, isolated sites with lower long-term conservation value." CDFW believes Ruffin Canyon, as MHPA, is intended to provide long-term conservation value. Additionally, CDFW is concerned that the indirect effects of trail establishment and use without the offset of a NRMP and timely commitment by the City to manage the biological resources in Ruffin Canyon may easily lead to a reduction of the values in Ruffin Canyon. For this reason, rather than pay into the HAF, CDFW recommends mitigation be comprised of restoration and enhancement within the Ruffin Canyon MHPA. Such an effort would not only mitigate the direct impacts but would proactively provide much greater benefit to remaining resources which will be adversely affected by trail development and use.

Specific impacts: The MND proposes to mitigate direct impacts to Tier II Diegan coastal sage scrub (0.15 acre) and Tier IIIA southern mixed chaparral (0.22 acre) at a 1:1 ratio through payment into the City's HAF, or by purchase of habitat through an approved mitigation bank such as the Cornerstone Lands Mitigation Bank.

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Recommendations and Mitigation Measures: CDFW recommends that the City mitigate through restoration of disturbed habitats within Ruffin Canyon. This would more directly offset the adverse direct and indirect effects of allowing recreational access within the limited confines of Ruffin Canyon. CDFW believes this approach is more appropriate, particularly in the absence of the City's proposal to not complete a NRMP prior to designation of the new trail plan. The Wildlife Agencies are committed to working with the City to find an on-site mitigation solution which could have less financial impact than use of the HAF.

Mitigation Measure # CDFW-BIO-5a:

CDFW recommends inclusion of the following mitigation measure: The City shall develop an on-site mitigation plan to add and restore disturbed areas within sensitive habitats within closed areas of the MHPA.

Mitigation Measure # CDFW-REC-5b:

Additionally, CDFW recommends to close and designate areas within the northwestern finger of Ruffin Canyon or Sandrock Canyon to serve as mitigation for impacts within the MHPA. This can further include invasive species removal and restoration of native habitats in areas that were previously disturbed, and can include additional funding directed to ongoing, on-site restoration.

Editorial Comments and Suggestions

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.

FILING FEES

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

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Elyse Levy, Senior Environmental Scientist, at Elyse.Levy@wildlife.ca.gov.

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Sincerely,

DocuSigned by:


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David Mayer
Environmental Program Manager I
South Coast Region

Attachments:

Attachment A: Recommended Mitigation Measures

ec: CDFW

Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov

Jennifer Ludovissy, San Diego – Jennifer.Ludovissy@wildlife.ca.gov

Susan Howell, San Diego – Susan.Howell@wildlife.ca.gov

CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov

Jonathan Snyder, USFWS – Jonathan_d_Snyder@fws.gov

State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

REFERENCES

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Attachment A: Recommendations and Mitigation Measures

| Biological Resources | | | |
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| | Mitigation Measures | Timing | Responsible Party |
| CDFW-BIO-1 | <p>1. Prior to the issuance of any grading permit (for Public Utility Projects: prior to the preconstruction meeting), the City Manager (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the gnatcatcher are shown on the construction plans.</p> <p>No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the gnatcatcher, unless the following requirements have been met to the satisfaction of the City Manager:</p> <p>A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those habitat areas <u>within the MHPA</u> that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the gnatcatcher. Surveys for the gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:</p> <p>I. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>and</u></p> <p>III. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of</p> | <p>Prior to, During Construction, and Implementation</p> | <p>City/Project Proponent</p> |

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| | <p>occupied gnatcatcher habitat. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>or</u></p> <p>III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher.</p> | | |
| CDFW-BIO-2a | The MND and the Plan shall include a delineation of the jurisdictional features on site. Any direct impacts from future improvements to riparian resources, including unvegetated streambed, will be mitigated accordingly per the City's Biology Guidelines. A CDFW 1600 agreement may require additional mitigation measures. | Prior to, During Construction, and Implementation | City/Project Proponent |
| CDFW-BIO-2b | In addition to mitigation of impacts consistent with the City's Biology Guidelines, CDFW recommends that a Notification be submitted to CDFW pursuant to section 1600 <i>et seq.</i> of the Fish and Game Code for any potential modification to the bed, bank, or channel of the streambed, which includes potential crossing structures and vegetation modification on the stream bank. | Prior to, During Construction, and Implementation | City/Project Proponent |
| CDFW-BIO-3a | CDFW recommends that the Plan address impacts from bicycle use by imposing and enforcing speed limits. In addition, the City is reminded of its responsibilities to monitor and prevent users from going off trail or creating new unauthorized trails. | Prior to and During Implementation | City/ Project Proponent |
| CDFW-BIO-4a | Prior to adopting a Trails Plan, CDFW recommends the City develop a NRMP or ASMDs for Ruffin and Sandrock canyons. Absent completion of a NRMP or ASMDs, CDFW further recommends that the City commit to a minimum of monthly monitoring visits throughout the Ruffin Canyon MHPA to protect against adverse effects from | Prior to, During Construction, and Implementation | City/Project Proponent |

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| | recreational uses along or peripheral to the newly authorized trails. | | |
| CDFW-BIO-4b | If a Natural Resources Management Plan (NRMP) is not developed per MSCP guidance, in lieu of a NMRP, the Plan shall describe appropriate procedures for trails closure, including signage for sections of unauthorized trails that are not being designated by the Plan. | Prior to, During Construction, and Implementation | City/Project Proponent |
| CDFW-BIO-5a | CDFW recommends inclusion of the following mitigation measure: The City shall develop an on-site mitigation plan to add and restore disturbed areas within sensitive habitats within closed areas of the MHPA. | Prior to, During Construction, and Implementation | City/Project Proponent |
| | Recommendations | Timing | Responsible Party |
| CDFW-REC-3b | In addition, CDFW recommends closing the northwestern finger canyon of the proposed existing trail as part of approval of the Plan, due to the presence of sensitive wetlands including alkali and freshwater marsh, and riparian resources and the presence of a gnatcatcher territory directly on the trail. | Prior to, During Construction, and Implementation | City/Project Proponent |
| CDFW-REC-5b | Additionally, CDFW recommends to close and designate areas within the northwestern finger of Ruffin Canyon or Sandrock Canyon to serve as mitigation for impacts within the MHPA. This can further include invasive species removal and restoration of native habitats in areas that were previously disturbed, and can include additional funding directed to ongoing, on-site restoration. | Prior to, During Construction, and Implementation | City/Project Proponent |