November 4, 2004

Ms. Maeve Hanely
San Diego County Department of Parks and Recreation
5201 Ruffin Rd., Suite P
San Diego, CA 92123

2004 NOV 4 PM 5 06

Re: San Diego BayKeeper Comments on the Notice of Preparation for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

Dear Ms. Hanely:

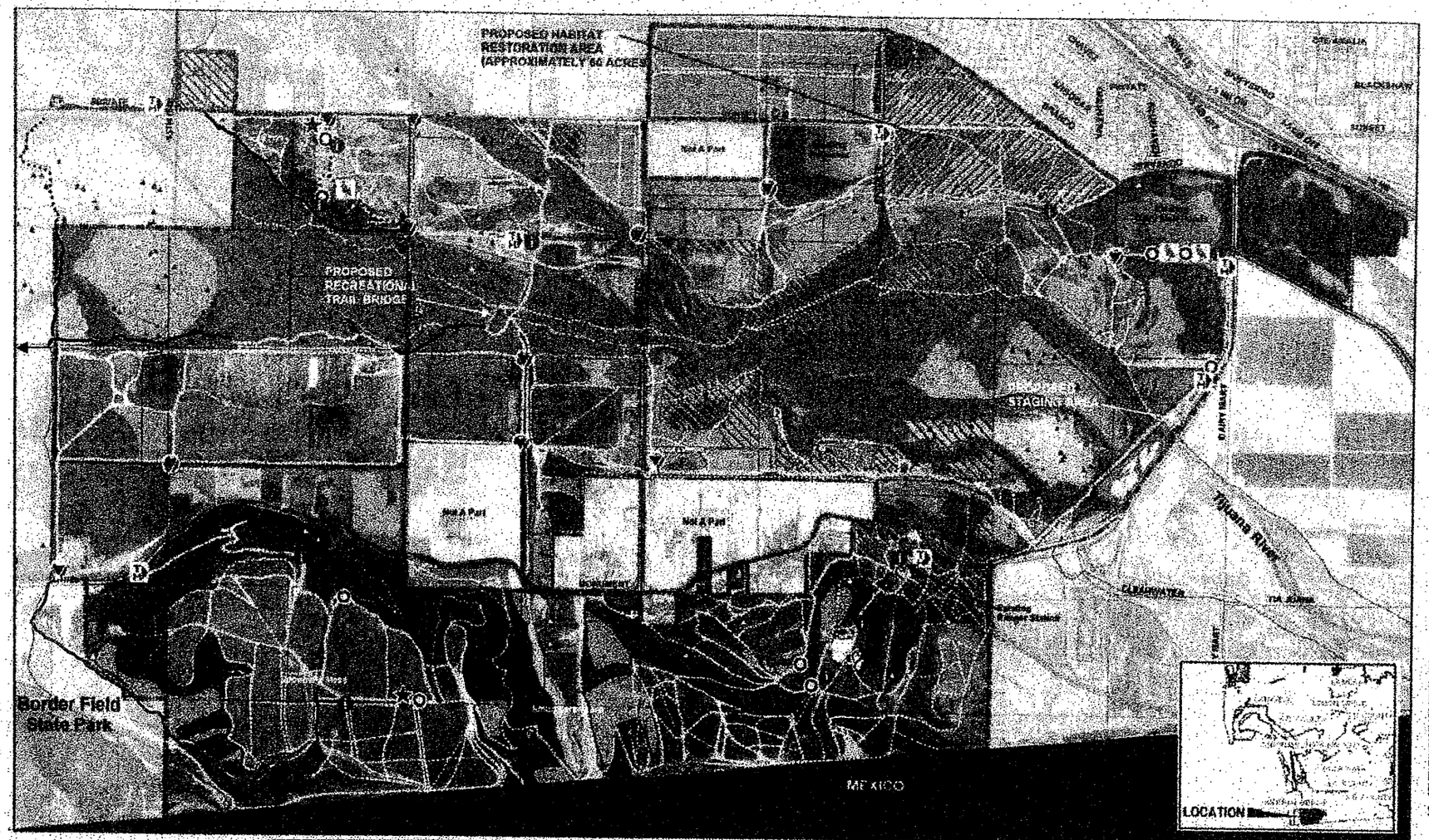
Thank you for the opportunity to comment on the NOP for the Tijuana River Valley Regional Park. San Diego BayKeeper is a non profit organization whose mission is to preserve, restore and enhance the region's waters and lands that affect San Diego's coastal areas for the people, plants and wildlife that depend on them. The planned restoration efforts contribute to the goals and objectives identified as priorities by our organization, and we strongly support the Tijuana River Valley Park Project (TRPP). I attended your scoping meeting on October 25 and submitted a short list of written comments. Also, the majority of our issues are covered in the letter sent to you by Environmental Health Coalition (EHC). We concur with the points EHC raised and submit this letter as a supplement to the latter.

The impact of edge effects on rare species such at the least Bell's vireo

One of the primary benefits of the TRPP is that we will finally have an opportunity to plan the area by design rather than perpetuating what has evolved over time by chance. The trails and multiple uses in the area today have evolved over the course of years without a comprehensive plan. As a result the area is not being used optimally. Some trails dead-end and others are redundant. The planning process provides an opportunity to consolidate and plan trails so as to avoid "edge effects." From an ecological point of view the term "edge effect" refers to the negative consequences which result from habitat fragmentation. For example, when habitat is dissected by a trail or road this may result in a physical barrier to the movement of some smaller species. The edge created on either side of the trail or the road also increases access for predators and humans in an otherwise inaccessible area. Scientific research indicates that perhaps the single biggest tool for protecting biodiversity lies in protecting large blocks of contiguous habitat and concomitantly reducing edge effects.

In the Tijuana River Valley edge effects, if not reduced, could have a negative effect on the long-term survival and recovery of the least Bell's vireo. Cowbirds, a competitor of the vireo, access vireo habitat via edges such as those that are formed by trails, and are therefore able to enter dense natural habitat which would otherwise be inaccessible. Although cowbirds in the area are currently trapped, we do not know if funding will exist in perpetuity. Additionally, it is important to realize that cowbirds can be a problem even when horses are not present: cowbirds from surrounding agricultural areas may enter the

2924 Emerson St., Suite 220 • San Diego, CA 92106
619-758-7743 / FAX 619-758-7740 / Pollution Hotline 1-877-4CACOAST
Email: sdbaykeeper@sdbaykeeper.org / Web Page: http://www.sdbaykeeper.org
A 501(c)(3) non profit organization and member of the International Water Keeper Alliance



Proposed Project to Permit

6' Wide Mud-Use Trail (14.7 Miles)
Memo of Understanding (MOU) Trail 1997
(To be superseded by the Proposed Project) - (10.3 Miles)

Proposed Habitat Restoration (60 acres)
Future Habitat Restoration areas (Approximately 89 acres)
Trail Fixed (Sign with park map, hitching post, bike rack and bench)
Interpretive Signage
Hitching post and bike rack
Bench
Bird Observation Blind
Directional Signage

NOTES
Trail Marker Locations to be determined
See plan for Proposed Recreational Bridge
See plan for Proposed Staging Area

Existing Conditions

Tijuana River Valley Regional Park
Existing Dirt Roads and Pathways (71.0 Miles)*
Tijuana River National Estuarine Research Reserve (TRNERR)

Riparian Plant Communities**
Southern Willow Scrub
Restored Southern Willow Scrub
Southern Cottonwood-Willow Riparian
Mule Fat Scrub
Fresh Water Marsh
Open Water

Rare Plant Locations**
Chaenactis glabriuscula var. orcuttiana
Coreopsis maritima
Euphorbia misera
Ferocactus viridescens
Ornithostaphylos oppositifolia
Quercus dumosa
Selaginella cinerascens
Viguiera laciniata

Spring Survey**
Least Bell's Vireo
Other Sensitive Bird Species

* Data Source: Tijuana Trails, Inc. 2004
** Data Source: EcoSystems Restoration Associates, 2004

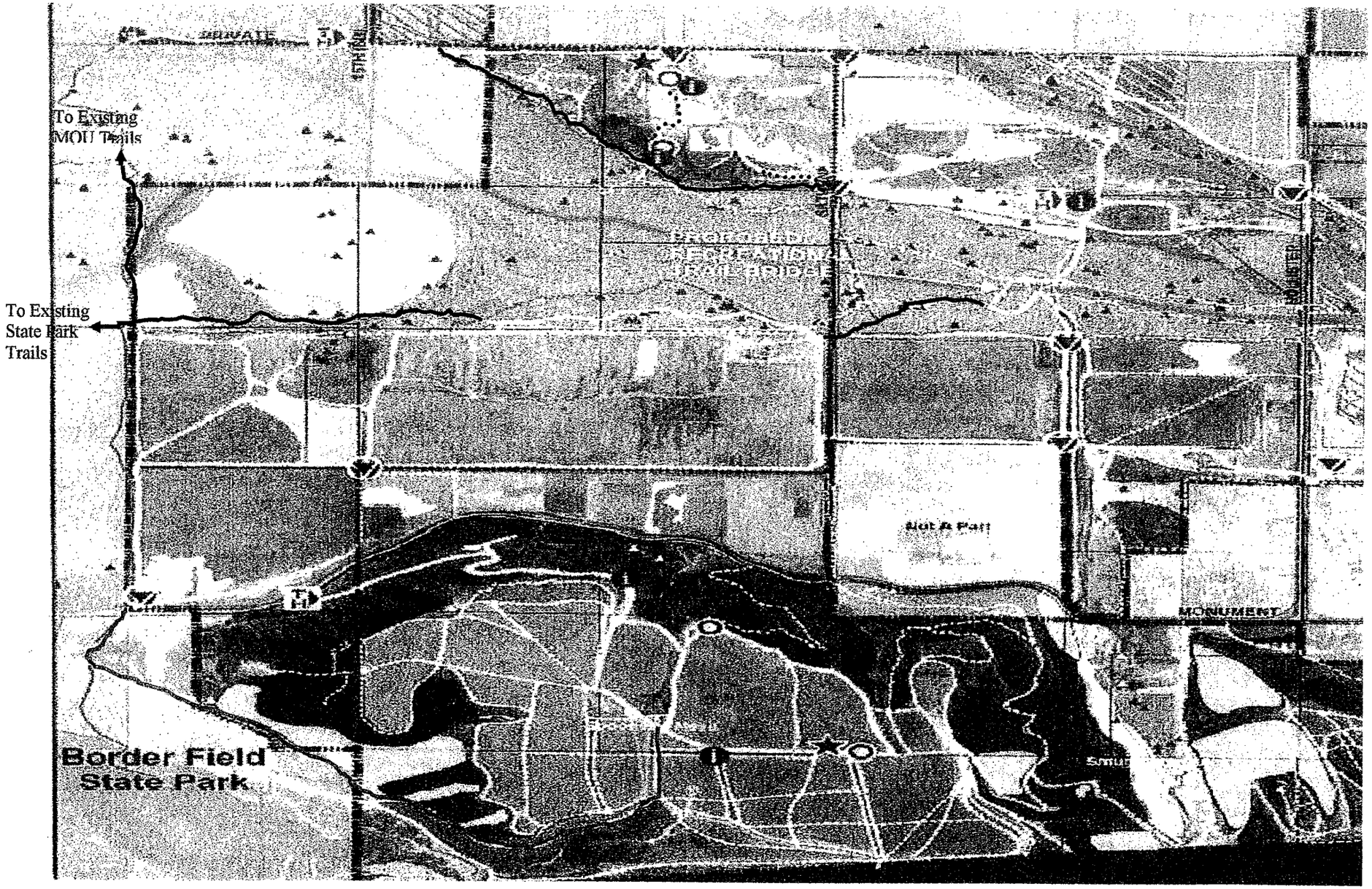
Proposed Retention (1997 MOU Trail) ——, addition ——, and deletion •••••• .
Submitted by: Wayne A. Yarroll, 1777 Thelborn Way San Diego 92154, (619) 423-7349
TAYNWAY@AOL.COM
Comments: Retention of MOU Trails would allow continuation to existing trails with no disruption to wild life and habitat. The proposed addition would allow a second access/egress to the Mesa as existing road is narrow and with an increase of traffic would become hazardous. Deletion in the area of ponds would facilitate birding and day walkers.

PARKS AND RECREATION
COUNTY OF SAN DIEGO

SanGIS

Proposed Project (Sheet A)

Exhibit 3
Draft 9-23-04



Proposed Retention (1997 MOU Trail) ——, addition ——, and deletion ·····.
Submitted by: Wayne A. Yarroll

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

taynway@aol.com
e-mail address (optional)

WAYNE A. YARROLL
Name

INTERESTED EQUISTRIAN
Organization

1777 THELBORN WAY
Street Address

Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

PLEASE SEE ATTACHED SHEETS.
Bridge is of good design. Consideration should be given to type of material on bridge surface, e.g., texture / material type etc.

I will be providing additional comments on trails.

Wayne Yarroll

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

YORK AND ASSOCIATES

dba Alpine Mountain Real Estate
1363 Peaceful Place, Alpine, CA 91901
619-445-9922, fax 619-445-7751
e-mail denimcwgl@aol.com

November 1, 2004

Dear Maeve Hanley:

Please DON"T ruin the one riding place we have to ride in the ocean. You should be encouraging horse use there instead of trying to get rid of it.

Cost for making 14+ miles of multi-purpose trail AND maintaining them following annual flooding would be prohibitive. Volunteers primarily maintain current equestrian trails in the local equestrian association thus of negligible financial impact.

Horseback riders make it safer for everyone and if you ruin the trails they have to ride on, the less affluent horse owners will have to give up there horses entirely.

Please reconsider the TVR plan you are working on.

Sincerely,

Adeline York

1363 Peaceful Place
Alpine, CA 91901

SAN DIEGO CA 921 N
PM
03 NOV
2004

ALW
US
ZIP CODE

2004 NOV 4 PM 2 09

Tijuana River Valley

Maeve Hanley
San Diego Department of Parks and
Recreation
201 Ruffin Road, Suite P
San Diego, CA 92123

92123/9999

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

BMcCAUS @ AOL.COM
e-mail address (optional)

WILLIAM McCAUSLAND
Name

SAN DIEGO AUDUBON SOCIETY
Organization

4054 UTAH ST., APT. 2
Street Address

619-692-3246
Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92104
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

SEE ENCLOSED CORRESPONDENCE

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego, CA 92110 • 619/682-7200 • Fax 619/682-7212

November 5, 2004

Ms. Maeve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA., 92123

Re: Tijuana River Valley Regional Park Trails
and Habitat Enhancement Project

Dear Ms. Hanley,

This correspondence is a few days past the 11/04/04 deadline for comments, but circumstances were such that I was unable to accomplish the task sooner. My comments are very limited anyway. Enclosed is a copy of correspondence sent to Mr.Repasy several years ago, regarding the Dairy Mart Ponds. My comments accordingly are in regards to the Dairy Mart Ponds. I had also met with a park ragnger at the Dairy Mart Ponds site several months ago to discuss various concerns. I look forward to seeing the implementation of the proposed changes around the periphery of the Dairy Mart Ponds, as indicated on the project map. I have just a few concerns or suggestions:

1. The area directly east of the present single pond (across Dairy Mart Road) does not indicate any proposed trails. Twenty years ago this area was of a swamp-like character — considerable shallow water and much vegetation. Years earlier it was apparently a second pond (thus the present-day Dairy Mart Ponds designation). Since now the area is generally dry in most years, it would be desirable to have at least one meandering trail or possibly two crisscross trails, through the area. Birders would especially appreciate this, as well as hikers. About a hundred yards further east of the Dairy Mart Road, but still in this same segment, there had been another smaller pond surrounded by tall reeds. The pond is no longer conveniently accessible since the roadway immediately to the south was constucted. It would be desirable to have this pond conveniently accessible to birders and hikers.

2. The planning map conspicuously shows theTijuana River flowing through the valley and to the ocean. From what I've been able to determine, there is in fact, presently no actual river in the valley during normal years (this year excluded), due to the wastewater treatment plant. Apparently the treated water is piped directly from the treatment plant to the ocean — bypassing the remainder of the riverbed. This doesn't appear to be a good thing. We wanted to dispense with the badly polluted condition of the river water, but now we have no water at all in the river normally. It seems there is a better answer than that , and a "riverless" regional park doesn't seem very appetizing.

3 The map indicates that Least Bell's Vireos are found all throughout the Valley. To

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my knowledge Least Bell's Vireos do not occur far from a fresh water source. In line with the previous concern about the future status of the Tijuana River, other than the area around the Dairy Mart Pond, it's doubtful that Least Bell's Vireos wil remain in many parts of the Valley if a convenient body of fresh water (such as the river or a pond) is not available. I even wonder if some have already abandoned the valley because of the lack of river water the past several years. Has a recent census even been aken?

Anyway these are a few of my concerns and hopefully I am not too late with them. I appreciate the opportunity to participate in commenting on this project. It appears there will be an overall positive outcome .

Sincerely,

William J. McCausland

William J. McCausland
Field Trips Chairman
San Diego Audubon Society

4054 Utah St., Apt. 2
San Diego, CA., 92104
619-692-3246

SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego, CA 92110 • 619/682-7200 • Fax 619/682-7212

September 27, 1999

Richard Repasy
Park Project Manager
County of San Diego
Dept. of Parks and Recreation
Ruffin Road Annex
5201 Ruffin Road, Suite P
San Diego, CA., 92123

Re: Tijuana River Valley Regional Park
Dairy Mart Ponds

Dear Mr. Repasy:

I spoke with you briefly at the Technical Advisory Committee Meeting on September 15, 1999. I'm the Field Trips Chairman for San Diego Audubon Society and joined Jim Peugh and Jim Coatsworth of Audubon, at the meeting. I was specifically interested in addressing concerns about the Dairy Mart Ponds. Of course, I was also intensely interested in the entire proposed plan for the Tijuana River Valley Regional Park.

I had several questions and concerns about the Dairy Mart Ponds, but time ran out for further discussion. However I did get enlightened on several aspects of the Ponds, through a private discussion with you. I'd like to outlineSan Diego Audubon's concerns, as well concerns of many other San Diego Area birders also, regarding the present condition of the Ponds and the intended future of the Ponds. Though the proposed Management Framework Plan didn't address the Ponds in great detail,what was proposed appears to be a positive step.

Our concerns about the Dairy Mart Ponds are as follows:

1) Though the Dairy Mart Ponds are within the boundaries of the proposed Tijuana River Valley Regional Park, the agency presently responsible for management of the Ponds — State Fish and Game — has not apparently taken any interest in planning for the Ponds (for whatever reasons) — nor are they apparently planning any future involvement. The Dairy Mart Ponds and the surrounding area are presently a "disaster area" — with thick weeds completely engulfing the periphery of the large (west) pond, and the east so-called pond, completely engulfed with weeds throughout. Trash is scattered all along Dairy Mart Road adjacent to the ponds. This was always a popular birding area in past years for local birders, as well as visiting birders from other areas of California, other areas of the country, and even for foreign birders. When the Ponds were acquired by State funds, everyone assumed that meant the Ponds would be well maintained and protected. Nowadays, it's almost impossible to see into the ponds

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because of the overgrowth of vegetation. The so-called east pond has only a remnant of open water and otherwise is a complete "jungle".

2) The Dairy Mart Ponds are in immediate need of attention and cannot wait for the eventual development of the Regional Park. Hopefully every effort will be made to get ownership and management of the Ponds transferred to the County or some other concerned responsible agency, as soon as possible, and proper maintenance measures can be effectively implemented. The undesirable vegetation around the periphery should be eliminated and other vegetation trimmed where necessary so that the entire periphery is opened up for convenient viewing by birders and the general public — restored to their previous condition, and consistent with the proposed hiking trails and viewing blinds around the periphery of both ponds.
3) There seems to be somewhat of an uncertainty as to what the complete source of groundwater is for the Dairy Mart Ponds — Did the Tijuana River help supply the groundwater? Is the groundwater supplemented by springs? Or is the groundwater completely dependent on annual rainfall runoff?
4) The Tijuana River is presently completely dried up — a phenomenon I don't really recall ever seeing before. Though the river always has been a trickle in the fall months, before we receive any meaningful rainfall , it appears this present dried -up condition is human-created. Could it be related to the large housing development, the new bridge construction, or the International Boundary Water Commission Treatment Plant? Though the river water was always badly polluted, the future status of the river, as a river (but a relatively "clean" river), should be assured. The river course is prominently displayed on all the maps for the proposed Regional Park — there should be a guarantee it will contain water. If the water is initially diverted and the treated water discharged elsewhere, a dry and weed-overgrown riverbed won't be an asset to the park, and will be a disaster for valley wildlife. The status of the river should be fully evaluated and the natural flow of the water (whatever there is in the fall months) should be restored as soon as possible.
5) Since the Dairy Mart Ponds were acquired by State Funds, with the intent of preserving the area in a natural state, and the Ponds will be included in the Tijuana River Valley Regional Park, every effort should be made to protect, preserve and maintain them in the interim period while the park is being planned and then developed.

Hopefully, everyone involved in implementing the Park plans will not overlook the uniqueness of the already-existent Dairy Mart Ponds.

Sincerely ,

William J. McCausland
Field Trips Chairman
San Diego Audubon Society

San Diego Audubon Society
4891 PACIFIC HWY, SUITE 112
San Diego CA 92110

SAN DIEGO CA 921
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2004

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Ms. Maeve Hanley
San Diego. Dept. of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA., 92123

92123+4310

WiLDCOAST
international conservation team
925 Seacoast Drive
Imperial Beach, CA 91932

2004 NOV 2 PM 2 03

Ms. Maeve Hanley
San Diego County Dept. of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

www.wildcoast.net

92123+1653

November 3, 2004

Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

RE: EHC Comments on the Notice of Preparation for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

Dear Ms. Hanley

WiLDCOAST wishes to submit the following comments regarding the Scoping for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (TRPP). We strongly support the TRPP and applaud its effort to replace planning-by-chance with planning-by-design. The ultimate plan should result in a well-designed set of trails and restoration projects that provide a quality experience, broaden the range of uses for more people, provide maximum protection for habitat and actions that fully mitigate impacts.

WiLDCOAST believes that trails should primarily serve the low-income youth of the region, rather than adult equestrian uses. In fact we believe that equestrian uses result in significant and unmitigated impacts to water quality and adversely impact the recreational opportunities for youth in the region to enjoy the ocean in Imperial Beach due to equestrian related water pollution.

CUMULATIVE IMPACTS OF ALL TRAILS NEEDS TO BE ASSESSED

The DEIR must assess the cumulative impacts, not just of new proposed trails, but of existing, adjacent trails and uses-- whether planned or not. There must also be an analysis of issues such as the Monument Trail head Road and impacts induced in the park from adjacent uses and developments.

ALTERNATIVES SHOULD FOCUS ON MULTIPLE USES OF THE AREA

The Draft Environmental Impact Report (DEIR) should describe a series of different alternatives for the restoration and trails components that all address the variety of uses and priorities for the area. These should include (but not be limited to)

- Endangered Species Management
- Ecotourism type activities
- Blinds and overlooks
- Endangered Species Management
- Wildlife Viewing
- Equestrian Uses
- Photographic uses
- Birding and scenic overlooks
- Hiking
- Walking
- Running
- Biking
- Educational
- Tourism
- Cultural tourism
- Natural, Historic, and Cultural interpretation

Other innovative ideas could be included or developed such as bouldering areas, educational

farm area, educational active archeological dig.

THE HIGHEST PRIORITY MUST BE PLACED ON SPECIES PROTECTION
This is a large multi-use area, however the wildlife values must receive priority protection since there is nowhere else where these species can thrive. The wildlife support value must be well protected, managed, and enhanced. The needs of wildlife must be a priority so that we don't destroy the very things that we are trying to protect with the Park and the Estuary designations.

IMPACTS MUST BE FULLY ANALYZED AND MITIGATED
Visitor trails and facilities must be very well thought-out and managed so that they do not degrade the habitat value, the wildlife, and the water quality. Flooding and erosion impacts must be avoided in the design.

IMPACTS OF ANIMAL WASTES MUST BE ADDRESSED AND MITIGATED
Mitigations for water quality impacts must be fully addressed and the implications of the stormwater permit must also be addressed. Just as users of the dog beaches in San Diego County have had to radically change their behavior regarding dog waste on the beach, we need to develop a mitigation plan for horse and dog waste on the River Park trails. Since there is are active and effective stewardship groups of hikers and equestrians, we recommend that the County partner with these groups to establish a regular and funded series of Trail cleanup days that would, on a weekly or monthly basis, walk all trails where horse and dogs are allowed to clean up and remove waste. This would be an action that would assist the County in compliance with the Municipal Stormwater permit and would reduce associated water quality and habitat impacts of the waste.

PREFERENCE FOR TRAIL LOCATIONS SHOULD BE BASED ON BEST LOCATION AND NOT CURRENT LOCATION
A seemingly haphazard series of many miles of unplanned trails and roads has evolved in the area. A smaller, better planned, less redundant system of trails should be designed to minimize impacts and maximize quality of experience. In many cases, it may be that the best location for the trails is not the current location. New plans should be redesigned to reflect the highest quality experiences and the lowest environmental impact. We urge that the TRPP include rerouting and redesigning many trails and facilities, where needed, to provide a better system with less environmental impact and less need for maintenance.
This analysis should:

- Identify a system for continuously evaluating the carrying capacity for a mix of uses, and incorporate plans to make closures, limits of uses, and adjustments to trails when the carrying capacities are exceeded. This should consideration of nesting, excessive wear, water quality, erosion, etc.
- Evaluate the cumulative impacts of the planned trails in conjunction with existing facilities and trails, including the Border Patrol and other agencies.
- Place as few trails as possible in flood-prone areas or areas that are often wet due to runoff.
- Avoid having trails near critical nesting and foraging areas.
- Provide an adequate buffer between trails and environmentally sensitive habitat areas such as wetlands.

IMPACTS OF BORDER PATROL MUST BE ANALYZED AND MITIGATED
A couple years ago during our Border Peace Concert, EHC representatives were highly dismayed to see that the Border Patrol, deliberately and unnecessarily, ignored postings of the tern and plover nesting sites when these areas were in active nesting. We reported on these concerns at length. While we understand that the Border Patrol is operating in the area, they should be required to comply with the same laws and regulations as everyone else. If they do not, then we must assume that this will result in increased impacts and "take" of species and so, unfortunately,

their activities will result in reduced opportunities for the general public to use the area. The County should secure assurances and enforceable commitments from the Border Patrol about which rules they will comply with.

THE IMPACTS OF THE TRIPLE BORDER FENCE MUST ALSO BE INCLUDED IF THE FENCE MOVES FORWARD

The expected environmental devastation that will be wrought on the area if the triple fence is allowed to move forward must also be addressed in the analysis. Unfortunately, a local Congressional leader is attempting to make the Triple fence exempt from virtually all environmental laws. This will do nothing but further, negatively, impact what use and the extent of uses that can be allowed in the Tijuana River Park by the general public.

ENFORCEMENT MEASURES MUST BE IDENTIFIED AND APPROPRIATE AGENCIES COMMITTED

Lack of enforcement of rules and regulations has been cited as a significant issue repeatedly in this area. Enforcement measures and how they will be executed must be evaluated and addressed in the DEIR.

ENVIRONMENTAL JUSTICE SHOULD BE EVALUATED AND VISITATION PROMOTED IN SAN DIEGO COUNTY LOW-INCOME AND COMMUNITIES OF COLOR

The River Park is located near low-income and communities of color. The access of these communities to the River Park should be facilitated. All materials should be in the primary languages of the region include,but not limited to, English and SpanishThis will also help to serve any tourists to the region which will, in turn, help in the economics of the area.

ECONOMIC VALUE OF THE PARK AS AN ECOTOURISM DESTINATION SHOULD BE ADDRESSED AND ANALYZED

There are multiple efforts underway to develop South Bay natural areas as a focal point for ecotourism and nature and recreation-based activities. Such a comprehensive development plan will greatly enhance resources for local and regional users and contribute to the economy of South County cities. An economic contribution analysis should also be included in the DEIR.

OTHER PLANNING EFFORTS SHOULD BE INCLUDED IN THE REGIONAL ANALYSIS

There are multiple planning efforts on-going that will impact the development of this regional asset. The San Diego National Wildlife Refuge Comprehensive Conservation Plan, the City of Chula Vista's General Plan and Bayfront Master Planning Efforts, the Chula Vista Greenbelt plan, Otay River Regional Park, and the County's General Plan 2020.

IMPACTS TO PLANT COMMUNITIES MUST ALSO RECEIVE FULL ANALYSIS

While there is much focus on the animal species in the region, the DEIR must fully analyze and mitigate impacts to plant communities as well.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Serge Dedina, Ph.D.
Executive Director

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

taynway@aol.com
e-mail address (optional)

WAYNE A. YARROLL
Name

INTERESTED EQUESTRIAN
Organization

1777 THELBORN WAY
Street Address

Daytime Phone No. (optional)

SAN DIEGO
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Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

PLEASE SEE ATTACHED SHEETS.
Bridge is of good design. Consideration should be given to type of material on bridge surface, e.g., texture / material type etc.

Will be providing additional comments on trails.

Wayne Yarroll

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

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PLEASE PRINT

ZEKEMAZUR@YAHOO.COM
e-mail address (optional)

ZEKE MAZUR
Name

SELF
Organization

522 7th "APT E"
Street Address

423-4652
Daytime Phone No. (optional)

I.B.
City

CA
State

~~919 91~~ ~~423-4652~~
Zip Code 91932

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR.
Please provide your comments in the section below (use additional pages if necessary).

I WOULD LIKE SPACE TO FLY SILENT ELECTRIC MODEL AIRPLANES
IT WOULD BE NICE TO ALLOW ELECTRIC POWERED
TWO WHEELED VEHICLES

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

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HABITAT ENHANCEMENT PROJECT Comment Form

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~~PLEASE PRINT~~

Attention: Ms. Maeve Hanley

e-mail address (optional)

Name Sandra Gable

Organization Local Horseperson "Trivia"

Street Address (optional) 2268 Morningside St

Daytime Phone No. 619-479-9574

City San Diego **State** Ca **Zip Code** 92139

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

+ There is a history of Horses in the TRV since 1769!
- The CCC Grant was for trail enhancement not elimination!
- There is no proof that horses have a negative effect on the habitat & there are more birds than 20 years ago.
- I have ridden the valley for 36 yrs. ... it used to be a sandy river bed ... the floods have created the beauty i.e. trees, brush, flowers = habitat for the birds, & the equestrians are an asset!!
- We appreciate the staging Area, etc for visiting equestrians! Please keep some of the Alternative Trails for the horse people! Thanks for listening! Sable

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project - State Clearinghouse #2004091159 11-4-04

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

2004 NOV 4 AM 10 04

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

tayNway@aol.com
e-mail address (optional)

Wayne Yarroll
Name

Concerned Equestrian
Organization

1777 Harborview Way
Street Address

Daytime Phone No. (optional)

San Diego
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please ~~provide~~ your comments in the section below (use additional pages if necessary).

Please see attached

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Comments submitted by:
Wayne Yarroll
1777 Thelborn Way
San Diego Ca 92154
Email: taynway@aol.com

General Comments on Proposed Exhibit Project (Sheet A) Exhibit 3 Draft 9-23-04

First of all I would like to thank all of the presenters and respective agencies for the excellent presentation. Very professional. I for one was very happy to see the community interaction without digressing to shouting matches. It is perceived that the community has adopted the idea that what was presented is "proposed" and requires the input of all to achieve a workable and equitable solution for all.

The proposed bridge and staging area, Dairy Mart Road are both excellent ideas.

I do feel that there are not enough trails, equestrian, biking and hiking. In the design and routing of any trails, consideration should be given to maintain linkages to existing State Park and TNNER trails. If trail realignment is being considered in these areas, it should be known now so that continuity of the system can be maintained.

The following comments address specific areas annotated on the attached.

1. Areas 1 and 2 become flooded after major, even minor, rain events. Consideration should be given to possible elevation of trail in these areas. Especially in area 2 of the proposed bridge.

2. With the eventual berm removal, area 3, will improve flow under Hollister Street bridge, but also contribute to flooding in area 2.

3. Trails in area 3, often referred to as Sherwood Forrest, should be retained as equestrian and hiking trail.

4. Trails shown in area 5 are geographically displaced. These exist on the north side of the river.

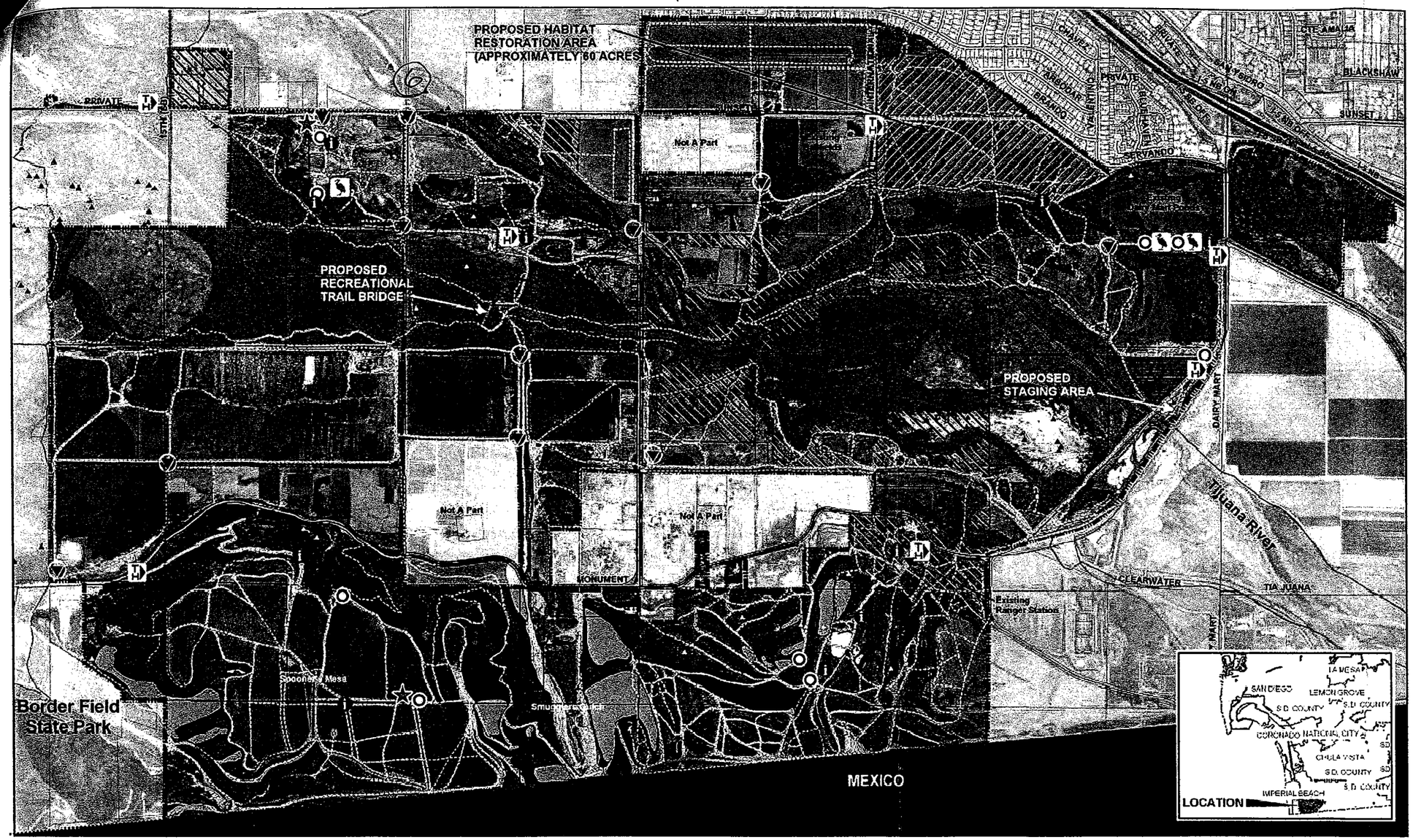
5. Area 6 is outside of County Regional Park, but has a direct affect on trail access, and proposed Bird Observation Blind. This area becomes flooded upon major rain events. Recent water flow has rendered passing through this area to precarious at best due to roadbed degradation.

Thank you for your consideration

Wayne Yarroll

Wayne Yarroll

INPUT BY: WAYNE YARROLL 10/20/04



Proposed Project to Permit

- 6' Wide Multi-Use Trail (14.7 Miles)
- Memo of Understanding (MOU) Trail 1997 (To be superseded by the Proposed Project) - (10.3 Miles)
- Proposed Habitat Restoration (60 acres)
- Future Habitat Restoration areas, (Approximately 89 acres)
- Trail Head (Sign with park map, hitching post, bike rack and bench)
- Interpretive Signage
- Hitching post and bike rack
- Bench
- Bird Observation Blind
- Directional Signage

NOTES:
Trail Marker Locations to be determined
See plan for Proposed Recreational Bridge
See plan for Proposed Staging Area

Existing Conditions

- Tijuana River Valley Regional Park
- Existing Dirt Roads and Pathways (71.0 Miles)*
- Tijuana River National Estuarine Research Reserve (TRNERR)

Riparian Plant Communities**

- Southern Willow Scrub
- Restored Southern Willow Scrub
- Southern Cottonwood-Willow Riparian
- Mule Fat Scrub
- Fresh Water Marsh
- Open Water

Rare Plant Locations**

- Chaenactis glabriuscula var. orcuttiana
- Coreopsis maritima
- Euphorbia misera
- Ferocactus viridescens
- Ornithostaphylos oppositifolia
- Quercus dumosa
- Selaginella cinerascens
- Viguiera lacinata

Spring Survey**

- Least Bell's Vireo
- Other Sensitive Bird Species

* Data Source: Dan Hays Trails, Inc., 2004
** Data Source: EcoSystems Restoration Associates, 2004

County of San Diego

NORTH 0 600 1,200 2,400 3,600 Feet

Tijuana River Valley Regional Park

Trails and Habitat Enhancement Project

PARKS AND RECREATION
COUNTY OF SAN DIEGO

VAN DYKE LLP

Greystone Environmental Consultants, Inc.
SWCA Environmental Consultants
WRC Consulting Services
G-Force

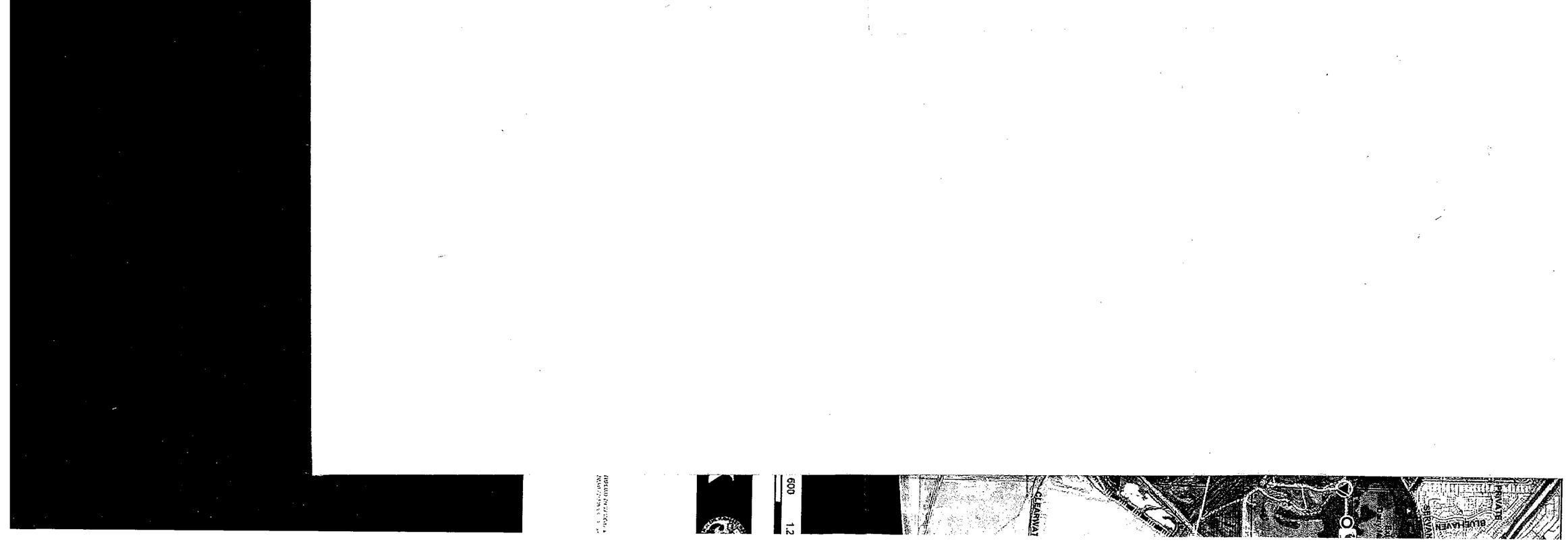
SanGIS

Proposed Project (Sheet A)
Exhibit 3
Draft 9-23-04

YARROLL
1777 THELBORN WAY
SAN DIEGO, CA 92154

2004 NOV 3 PM 1 18

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123



FAX 2004 NOV 4 AM 10 09

WALTER AND SUZANNE KIRKWOOD
PO BOX 638
DESCANSO, CA 91916
(619) 445-3555 PHONE
(619) 445-0550 FAX

TO:	Maeve Hanley, COMMENT FORMS
COMPANY:	San Diego County Dept of Parks and Recreation
FAX:	858-495-~~3555~~ 5841
PHONE:	858-694-2968
DATE:	11/2/04
RE:	Tijuana River Valley Regional Park Trails and Habitat Enhancement Project
PAGES:	1

Where are the TRAIL ENHANCEMENT parts of the project???

We would like not only to have the existing equestrian trails stay, but also new links with Otay and Sweetwater horse trails. Add bleachers and an announcer's booth so we can have horse shows and educational clinics for equestrians and the rest of the community.

Add overnight camping with water, bathrooms, and at least 12 corrals.

Add a Mounted Assistance Unit to patrol the park on horseback.

Thank you

370 Hilltop Dr
Chula Vista 91910

SAN DIEGO CA
PM
01 NOV
2004
92120

2004 NOV 2 PM 2 02

Ms. Maeve Hanley
San Diego Dept. of Parks/Recreation
5201 Ruffin Rd., Ste. P
San Diego, CA 92123

92123+1653

Re: Tijuana River Valley

(1)

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

orffmusic@cox.net
e-mail address (optional)

Val Cooper
Name

JRVEA
Organization

370 Hilltop Dr.
Street Address

619 427 7454
Daytime Phone No. (optional)

Chula Vista
City

CA
State

91910
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

please read comments attached
(3 pages total)

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

(2)

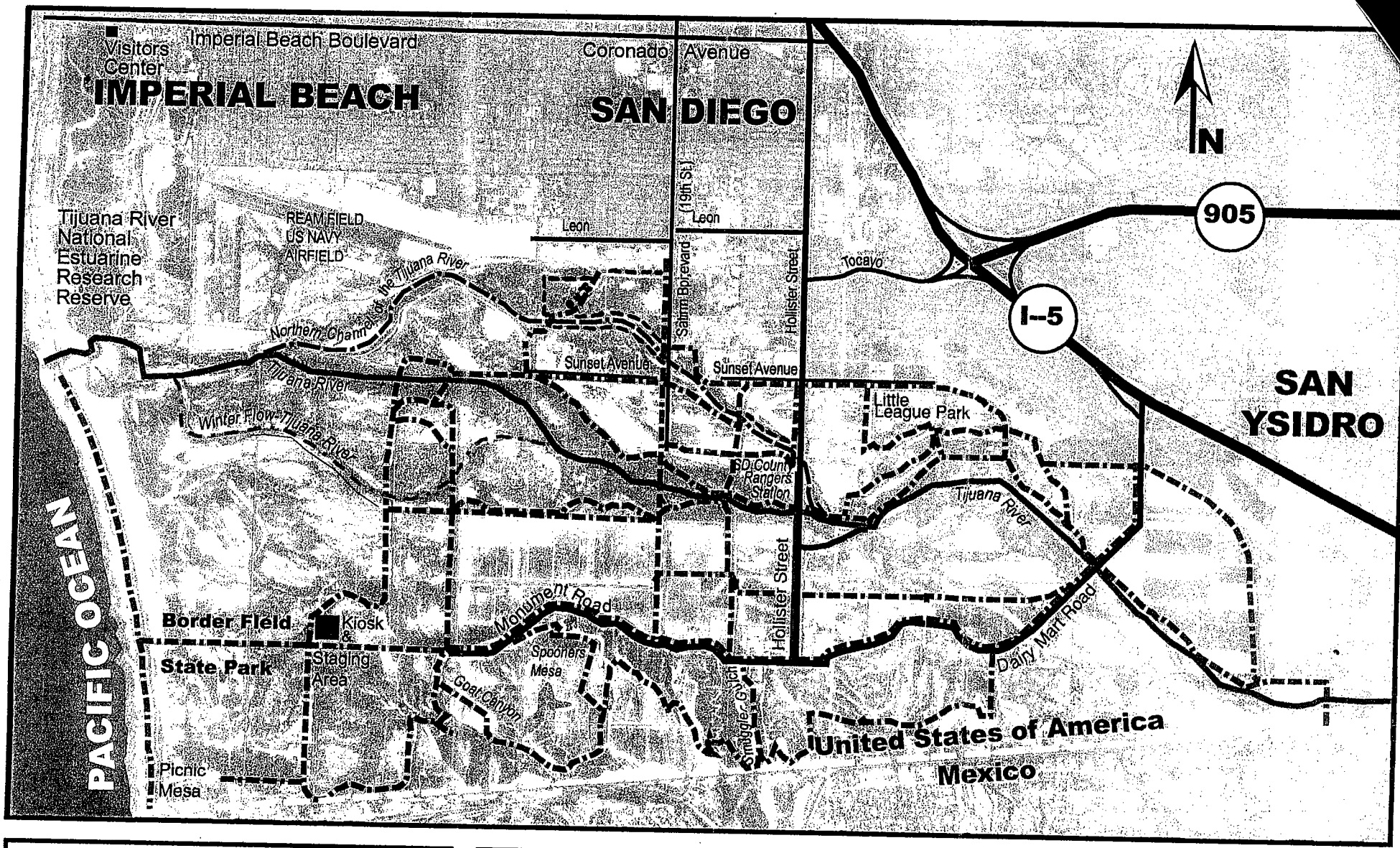
I have reviewed the exhibits shown on your website for the proposed trails in the Tijuana River Valley project and have the following concerns:

- How does the newly proposed trail system give access to the horse ranches in the area? Many horse facilities do not have easy access.
- How is the trail system continous through the (hills on the) west side of Dairy Mart/Monument Rd. so that the beach could be reached by a person traveling from a ranch on Dairy Mart (specifically - across Smugglers Gulch)?
- Why does the plan eliminate current trails not located in habitat restoration areas, only to propose a trail which cuts directly through a proposed habitat restoration area (west of Dairy Mart Ponds)?
- Why does the plan ignore the fact that the historic horse trails of this valley (since 1769) have actually discouraged transients from entering and living in the valley and encouraged birds like the Least Bells Vireo (endangered) to nest next to the trails? Equestrians have traditionally been the eyes and ears of the valley, reporting illegal and criminal behavior to authorities.
- Why doesn't the trail enhancement project include the network of horse trails already in place which do not pass through habitat restoration areas? (i.e. Cathedral Trail, Wycliff Trail and Sherwood Forest Trail)
- Why are the trails approved by the Memorandum of Understanding (MOU) not differentiated from those made by illegals and non-equestrians? (a committee under the authority of the Tijuana Estuarine Research Reserve Management Authority approved our current network of trails - which do NOT add up to the 71 miles cited by the county!)

The horsemen and women of the Tijuana River Valley are benevolent conservators of the natural beauty and wildness of their trails. TRVEA maintains all trails at no cost to city, county or state authorities. The biggest threat to the natural life of the valley comes from the water flowing from Tijuana filled with trash and pollutants - not from the horses riding the trails! The United States Border Patrol fully supports the presence of horses in the valley knowing that horsemen provide extra surveillance and protection.

Our South Bay community is a hard-working, middle class community which values our limited recreational outlets. Affordable horse facilities and trails are precious to many equestrians living in the South Bay. This proposed Trails Enhancement does not make balanced sense when reviewed by the members of TRVEA and equestrians knowledgable of the valley's needs and uses. Please redefine the proposed project to include our unique perspective.

Val Cooper



Tijuana River Valley Trails System

Approved Trails

Tijuana River

Map Graphics by Carolyn Powers

For current trail conditions, you may contact:

- http://www.ci.imperial-beach.ca.us/trv.htm
- California State Parks staff /Tijuana River National Estuarine Research Reserve Visitors Center at (619) 575-3613
- San Diego County Department of Parks & Recreation Rangers Station at (619) 428-2946

Approved Trails determined by the Round Table Trails Sub Committee under authority of the Tijuana River National Estuarine Research Reserve Management Authority. Participating committee members included: San Diego County Department of Parks & Recreation, California State Parks & Recreation, US Fish & Wildlife, State Coastal Conservancy, State Coastal Commission, US Navy, Citizens Against Recreational Eviction and Tijuana River Valley Equestrian Association.

3

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009

FACSIMILE TRANSMITTAL FORM

Date Sent:	*No. of Pages:*	*Time Sent: (Pacific Time)*
11/5/04	14	11:30 am

TO: Maeve Hanley

Fax No.: 858 495 5841

FROM: Carolyn Lieberman

Fax No: (760) 431-5902
Phone No.: (760) 431-9440

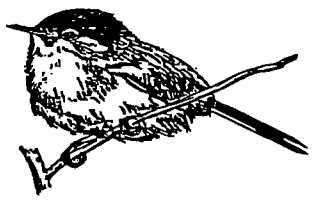
SUBJECT: Tijuana River Valley Regional Park

COMMENTS:

2004 NOV 5 R 11 46

If you have any have problems receiving this fax, please call (760) 431-9440, extension 284. Thank you.

California Gnatcatcher



The mission of the U.S. Fish and Wildlife Service is working with others to conserve, protect, and enhance fish and wildlife and their habitats for the continuing benefit of the American people.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009

In Reply Refer To:
FWS-SDG-1920.4

Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

NOV 05 2004

Re: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project, San Diego County, California.

Dear Ms. Hanley:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Tijuana River Valley Regional Park (Park) Trails and Habitat Enhancement Project, San Diego County, California. The Service also attended the October 25, 2004, Public Scoping Meeting and Community Forum for this project.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*). The Service is also responsible for operation and management of National Wildlife Refuges consistent with the purpose(s) for which a particular refuge was established under the National Wildlife Refuge System Administration Act of 1966 (NWRS Administration Act), as amended by the National Wildlife Refuge System Improvement Act of 1997. The Tijuana Slough National Wildlife Refuge (Tijuana Slough NWR) located west of the Park was established for the purpose of conserving fish, wildlife, and plants which are federally-listed as endangered or threatened species. A public use can only be authorized on a Refuge when it is determined to be compatible with the mission of the NWRS and the purpose(s) of the Refuge and is not inconsistent with public safety. Pursuant to our mandates and legal responsibilities, the Service has an interest in the proposed project because of the existing and potential fish and wildlife resources located within and adjacent to the Park, and as owner and manager of the Tijuana Slough NWR.

The proposed project is located in the County of San Diego's (County) Tijuana River Valley Regional Park (Park) in the southwestern portion of San Diego County. The Park is generally bounded by Dairy Mart Road to the east, the Tijuana River Estuary to the west, the U.S. / Mexico

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international border to the south, and Sunset Avenue and residential development to the north. The County owns 1,638 acres of the 1,800-acre Park, with the remaining acreage owned by the City of San Diego (City) and the California Department of Fish and Game. The Park is within the City's Multiple Habitat Planning Area (MHPA) of the Multiple Species Conservation Program Subarea Plan (MSCP).

While several unauthorized trails exists in the Park, there is currently no recreational trail network permitted through the California Environmental Quality Act and/or other applicable laws. The County proposes to formally designate trails on selected portions of existing dirt roads and pathways and close existing trails where they have resulted in habitat degradation, deterioration of the natural resources, and a declining recreational user experience. The proposed project includes: (1) formal designation of a multiple-use recreational (equestrian/bike/foot) trail network; (2) creation and restoration of 60 acres of wetland, riparian, and/or upland habitat; (3) installation of benches and interpretive signs; (4) creation of a two-acre trail head staging area along Dairy Mart Road; (5) installation of a steel-truss recreational bridge crossing the Tijuana River; and (6) creation of a management plan guiding the long-term development and management of resources within the Park.

In a letter to the County, dated January 9, 2004 (enclosed), we provided preliminary comments on this project and requested that the County develop a trail and restoration plan that meets the needs of the trail users and achieves the regional goals for protecting core biological areas and sensitive species. Many of these comments are relevant to the current NOP, therefore, we incorporate by reference our January 9 letter into these comments. We request that the issues presented in our January 9 and this current letter be evaluated in the DEIR and any mitigation measures that would address our concerns be incorporated into the scope of the project.

We acknowledge and appreciate the actions the County has taken to date to address our wildlife and habitat concerns. A comprehensive evaluation of the uses permitted in the Park is necessary to prevent further degradation and fragmentation of the Park's regionally significant biological resources. For example, despite a Memorandum of Understanding for Inter-Agency Trail Coordination (MOU signed by the Navy, Border Patrol, Service, County, State of California Parks and Recreation, State Parks Mounted Patrol, Citizens Against Recreation Eviction, and Tijuana River Valley Equestrian Association between 1996 and 1998) that specified 10.3 miles of trails in the Park, 71 miles of unauthorized trails now exist that were created without comprehensive planning or environmental review. The resulting fragmentation of habitat by unplanned utilization of the Park demonstrates the need for a comprehensive trail and operations/management plan.

To assist us in our review of the DEIR, assist the County in compliance with pertinent Federal and state statutes and laws, and ensure consistency with the MSCP, we request that the DEIR contain the following information:

1. A complete discussion of the purpose and need for the project and each of the project alternatives.

2. A complete description of the proposed project, including all practicable alternatives that have been considered to reduce project impacts to sensitive habitats, biological resources, federal and state listed threatened and endangered species, narrow endemic species, and the MHPA. The alternatives section of the DEIR should focus on alternatives that avoid or substantially lessen any of the significant biological effects of the proposed project. If an alternative is included that would result in one or more significant effects in addition to those that would be caused by the proposed project, the DEIR should discuss the impacts in sufficient detail to facilitate an informed review of the proposal. In addition, the discussion under such an alternative should adequately address the measures that would be necessary to mitigate significant biological impacts.

3. A description of the planning design criteria used to designate a proposed trail system layout that avoids and minimizes impacts to sensitive resources. Although designating trails on existing dirt roads is consistent with the MSCP, we are concerned that designating unauthorized trails may result in an unsustainable trail system that requires excessive maintenance in the future. Unauthorized trails do not have the benefit of planning to ensure that they have been appropriately placed in the landscape and designed (e.g., tread slope, tread surface) to minimize degradation over time. There are examples throughout the County, such as Mission Trails Regional Park, where existing roads and unauthorized trails have been converted to "official" trail status only to become a constant maintenance problem and the cause of chronic damage to the adjacent habitat. Existing roads and unauthorized trails tend to focus water down the trail because long sections of the tread have been constructed down the fall line, at steep grades, or along low points. This leads to significant erosion, downstream sedimentation, and a high incidence of "trail widening" that occurs when trail users travel outside the established trail to avoid mud, ruts, and other trail damage associated with improperly designed trails. Instead, existing trails that are not sustainable should be closed and/or relocated to minimize future management efforts.

4. A description of the proposed trail design for each trail length, which defines the tread width (e.g., six feet), width and height of the trail corridor (i.e., the area around a trail that is maintained free of vegetation), tread surface, and anticipated trail grade and slope (i.e., outslope, inslope, crown).

5. A description of the consistency of the project with the goals of the MSCP. Issue areas in the DEIR that may be influenced by the MSCP include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects." Refer to the MSCP documentation for guidance on land use adjacency guidelines and compatible uses within the MHPA.

Specifically address the consistency of the proposed trail design and layout with the General Management Directives of the MSCP for Public Access, Trails, and Recreation (section 1.5.2 of the City MSCP Subarea Plan) in the MHPA. For example, the County proposes a six-foot tread width in a core biological area of the MHPA while MSCP states that trails wider than four feet should not be located in core biological areas or wildlife corridors.

6. A complete listing and description of other trail planning efforts in the region. The DEIR should demonstrate how the proposed project will interconnect with other trail systems to minimize overall trail redundancy and provide a seamless trail experience in the region. The DEIR should describe how the proposed project may increase trail use and facilitate the creation of additional unauthorized trails in sensitive areas outside of the project boundary, such as within the adjacent Tijuana Slough NWR. If the proposed trail system could result in the introduction of unauthorized trail activities (e.g. mountain bikes, dog walking) into adjacent areas, the DEIR should address the potential impacts to off-site sensitive resources from such uses, and propose measures to help prevent such impacts. We recommend that the County not have trails connect to other properties without adequate coordination with the affected property owners.

7. An implementation schedule for all project components. We recommend that closures and revegetation of trails, and mitigation be initiated before and/or concurrent with project impacts.

8. A biological technical report that includes survey methods (including survey personnel, dates, times, and climate conditions), survey results, impact analysis, and proposed mitigation. The report should describe the biological resources associated with each habitat type. These descriptions should include both qualitative and quantitative assessments of the resources present on the proposed subject property, and include complete species lists for all biological resources on site. At a minimum, the following should be included:

   a. A list of federally listed, proposed, or candidate species; state listed and candidate species; locally sensitive species; and narrow endemic species that occur on, or in habitat contiguous with, the subject property. A detailed discussion of these species, including information pertaining to their local status and distribution, should be included.

   b. Specific acreage and description of the types of riparian, wetland, non-wetland waters of the U.S., southern maritime chaparral, maritime succulent scrub, coastal sage scrub, and other sensitive habitats that may be affected by each project alternative. Maps and tables should be included to summarize such information.

c. A map showing potential wildlife corridors through and/or adjacent to the subject property.

d. Results of early and late spring plant surveys of sensitive spring blooming annuals, which includes the rationale for why species with a high potential for occurrence may not have been detected.

e. Figures that depict each project alternative, biological data, and the relationship of the subject property to the MHPA.

f. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife species and associated habitats within the project area and on adjacent properties. This assessment should address all facets of the project (e.g., construction, implementation, operation) and include the following:

   i. An analysis of how the layout of the trails in the landscape and the design of the trail (e.g., slope) avoids and minimizes impacts to sensitive biological and hydrological resources.

   ii. Discussion of how the layout and design of the trail affects sensitive species through habitat loss, fragmentation, erosion, facilitation of human encroachment, and introduction of trash and animal waste.

   iii. Categorization of the sustainability of designated trails lengths based on susceptibility to erosion and flooding.

   iv. A complete hydrological analysis for this project to evaluate potential changes to hydrology, and how those changes may affect riparian areas, wetlands, and the MHPA. This analysis also should evaluate how the bridge may affect flows of the Tijuana River.

   v. A thorough analysis of adverse impacts resulting from increased encroachment of humans and noise into habitat supporting wildlife.

   vi. An analysis of how project-induced impacts may fragment open space, isolate wildlife and native vegetation communities, and affect wildlife movement at local and regional scales.

g. Specific mitigation plans to fully offset each project alternative's direct, indirect, and cumulative impacts to sensitive biological resources.

i. Project impacts should be mitigated through the preservation, creation, restoration, and/or enhancement of affected habitat types consistent with MSCP guidelines.

ii. Mitigation plans, if proposed, should be prepared by persons with specific expertise on southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic layout depicting the mitigation area; (d) time of year that planting will occur; (e) a description of the irrigation methodology to be employed; (f) measures to control exotic vegetation on site; (g) a detailed monitoring program which includes provisions for replanting areas where planted materials have not survived; (h) success criteria; (i) contingency measures in the event of mitigation failure; and (j) identification of the agency that will guarantee successful creation of the mitigation habitat and provide for the conservation of the restoration site in perpetuity.

iii. Identify measures to be taken to perpetually protect habitat values of preserved and/or mitigation areas. Issues that should be addressed include: enforcement of restrictions on vehicle, equestrian, and people access; proposed land dedications; monitoring and management programs; control of illegal dumping; restrictions on lighting near mitigation areas; and consistency with the MHPA land use adjacency guidelines, etc.

iv. The project proposes to actively close existing trails and revegetate them with native species. The DEIR should clearly document the acreage and mileage of trails that will be closed and whether these revegetated trails are proposed to serve as mitigation for the proposed project. If so, include a discussion of how the County will enforce the closure of, and prevent encroachment into, the revegetated trails.

v. Describe methods to be employed to prevent soil erosion and siltation of habitats.

vi. Describe methods to be employed to prevent discharge and disposal of toxic and/or caustic substances, including animal waste, from the proposed project.

vii. Description of how trail maintenance will avoid and minimize impacts to sensitive resources. For example, maintenance should be conducted outside the bird breeding season in nesting habitat to avoid impacts to nesting birds.

The Service appreciates the opportunity to comment on the NOP. We are available to work with the County in designing a functional trail system that avoids or otherwise minimizes impacts to biological resources, the MHPA, and the Tijuana Slough NWR. If you have questions regarding this letter please contact Carolyn Lieberman at (760) 431-9440 extension 240.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

cc: San Diego Regional Water Quality Control Board, Mike Porter
U.S. Army Corps of Engineers, Terry Dean
City of San Diego, Melanie Johnson
California Department of Fish and Game, Libby Lucas

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009

In Reply Refer To:
FWS-SDG-1920.3

JAN 09 2004

Renée E. Bahl, Director
County of San Diego
Department of Parks and Recreation
1600 Pacific Highway, Suite 209
San Diego, California 92101-2472

Re: Tijuana River Valley Regional Park Planning Efforts Habitat Restoration and Trails Planning, Phase I, San Diego County, California

Dear Ms. Bahl:

This letter addresses current and past planning efforts being conducted by the County of San Diego (County) to implement specific facilities and features within the Tijuana River Valley Regional Park (TRVRP), including the development of the Management Framework Plan for the TRVRP. This letter also addresses specific issues regarding your current planning efforts for Habitat Restoration and Trails Planning, Phase I, that were outlined at your December 3, 2003 public outreach meeting attended by Martin Kenney, Carolyn Lieberman, and Slader Buck of the U.S. Fish and Wildlife Service (Service). The Service is concerned that the County's current planning effort for the Tijuana River Valley (Valley) is focused almost exclusively on the provision of multiple trail routes through the Valley, with much less consideration being given to the endangered species and habitat protection policies and directives established for this area in the Multiple Species Conservation Program (MSCP). The Service requests that a more balanced approach to trail planning be implemented for the Valley; an approach that balances the trail desires of the local community and habitat protection goals adopted for the region through the MSCP, which includes education of the public of the natural resources found in the Valley .

The Management Framework Plan for the Tijuana River Valley Regional Park

Baseline planning for the TRVRP was addressed in the County of San Diego Parks and Recreation Department's June 2000 draft Management Framework Plan for the TRVRP (Framework Plan) that was prepared by the Schmidt Design Group, Inc. Proposals in the draft Framework Plan included the development of picnic areas, camping areas, equestrian facilities, hiking and equestrian trails, a 24-acre recreational lake with boating and fishing, ranger station/visitor center/cultural museum, and agricultural research center. The Service and California Department of Fish and Game (CDF&G) provided a joint letter of comment on the draft Framework Plan, dated June 25, 2001 (copy enclosed), in which we expressed a number of

TAKE PRIDE IN AMERICA

major concerns including: (a) the continuing increase in the amount and overall extent of the equestrian facilities proposed within the Framework Plan; (b) the proposed development of additional equestrian facilities without a specific long term commitment to implement and fund an annual brown-headed cowbird trapping program since cowbirds are known to be associated with horses and parasitize sensitive avian species including Federal and State listed threatened and endangered species; and (c) the need for additional County Park Rangers to monitor and regulate the increased recreational activity that would result from the proposed development.

In May 2002, the County released an updated Framework Plan, however, the Carlsbad Fish and Wildlife Service Office did not receive a copy of this plan until February 18, 2003. Although the May 2002 version of the Framework Plan is not identified as a final plan, it appears to be one and, as written, implies to the general public that they can expect the County to seek monies to implement the programs and facilities identified in the plan. The May 2002 version of the Framework Plan does not address the Service's comments to the previous version of the plan, nor does it include any discussion of the types of comments received and the actions taken by the County, if any, in response to those comments. At present, we are unable to support several specific facilities and developments identified in the May 2002 version of the Framework Plan because resource-related concerns regarding these projects have yet to be adequately addressed by the County. We are also concerned that the various proposals and development projects included in this plan have not received appropriate review under the California Environmental Quality Act (CEQA).

Habitat Restoration and Trails Planning in the Tijuana River Valley Regional Park

With monies provided by the California Coastal Conservancy, the County is currently developing a "step-down plan" from the May 2002 Framework Plan identified as "Habitat Restoration and Trails Planning, Phase I" (Habitat and Trails Planning Project). The Service recently attended your December 3, 2003 public outreach meeting for this project. The meeting agenda included a revised preliminary draft figure, dated December 2003, that indicated the location of proposed habitat restoration areas and "new" proposed trails to accommodate equestrians, bicycles, and hikers within TRVRP. These trails are apparently to be provided in addition to the extensive system of trails that currently exists within the Valley. According to the consultants, existing trails within the TRVRP would not be analyzed as a part of this project.

While we agree that it may not be feasible to identify every existing trail, road, or path that presently exists in the TRVRP, we do believe that the current project must consider the direct, indirect, and cumulative impacts to endangered and threatened species and sensitive habitat that could result from the proposed expansion of the existing trail system within the Valley. This portion of the Valley has been identified as a "Core Resource Area" in the MSCP and is designated as critical habitat for the Federal endangered least Bell's vireo. At the time that the vireo was listed as endangered, the Service began to work with the County to identify specific trail routes within the Valley that would balance the needs of the equestrian community with the requirements to protect habitat for this endangered species. As a result of this cooperative effort,

a Memorandum of Understanding for Inter-Agency Trail Coordination (MOU) was signed by the Navy, Border Patrol, Service, County, State of California Parks and Recreation, State Parks Mounted Patrol, Citizens Against Recreation Eviction (CARE), and Tijuana River Valley Equestrian Association (TRVEA). This MOU, which was signed by the County on March 26, 1998, established specific trail routes for the Valley. Since that time, additional trails and roads used as trails have been created in the Valley without County oversight, appropriate trail planning, or environmental review. The current trail planning effort proposes to once again expand the number of trails crossing through sensitive areas including areas that have been proposed for habitat restoration. The Service requests that this piece-meal planning of trails be replaced with a comprehensive, programmatic approach to trail planning that allows for a thorough evaluation of the direct and cumulative impacts to sensitive species and habitats, as required under CEQA. Once approved, the trail system should be delineated on a large scale 2003 aerial photograph and mapped with Global Positioning System (GPS) coordinates to ensure that no new trails are created without appropriate review and analysis. The trails identified in the MOU should be mapped first and there should be a clear distinction between the trails identified in the MOU and any new trails proposed.

In addition to our desire to see a comprehensive approach to trail planning in the Valley, the Service has also identified the following preliminary recommendations concerning the revised December 2003 Habitat and Trails Planning Project that we believe could assist the County in its current planning effort:

1. Reduce the width of the equestrian trails designated in your plan as "8 feet" and "4 feet" to 2 feet, which is currently being used in the Valley with minimal impact to sensitive habitats;
2. Relocate the "Multi-use trail" (e.g. colored purple on the trails figure) south to the existing dirt road that runs east-west along the southern boundary of the former Am-Sod property to increase the area available for habitat restoration and to minimize habitat fragmentation;
3. Remove existing unauthorized berm north of the former Am-Sod property to ensure the success of future restoration efforts for riparian habitat and restore the hydrological capacity of the Tijuana River to handle major flood events;
4. Collaborate with the City of San Diego and other interested parties such as Southwest Wetlands Interpretative Association (SWIA) to begin a systematic removal of unauthorized fill placed on the Brown's property, located northwest of the Tijuana River pilot channel and Hollister Road, to restore riparian habitat in this location and remove the narrowest and most constrictive reach of the mainstem Tijuana River in the Valley;
5. Increase collaborative efforts with SWIA to identify and implement programs to remove non-native plants in the TRVRP;
6. Eliminate all trail segments proposed to extend through habitat restoration areas to avoid fragmentation and minimize edge effects;
7. Eliminate proposed trail alignments that would create redundant trails and propose

the closure and restoration of existing redundant trails in the Valley (i.e., the double trails west of Hollister Street) to reduce fragmentation of riparian habitat in the Valley. Eliminate trails with a tendency to flood to reduce soil compaction and erosion in sensitive habitat, especially if an alternative route exists that does not tend to flood;

8. Eliminate from the project any trail routes that "deadend" at the eastern boundary of Tijuana Slough National Wildlife Refuge (Refuge) and if extended would enter the Refuge (trail alignments through the Refuge should be addressed independent of the County's current trail planning effort);
9. Develop a mitigation plan to be implemented prior to, or concurrent with, impacts to reduce temporal loss or degradation of sensitive habitats (mitigation may include cowbird trapping, restoring and enhancing habitat that includes removal of non-native plants, adequately signing designated trails, ensuring the public remains outside of designated closed areas, selective fencing to protect sensitive habitat, and closing repetitive trails);
10. Organize a volunteer user group and/or utilize Park Rangers to maintain a maximum trail width and discourage creation or maintenance of rouge trails not covered by the MOU or the proposed project (This is particularly important because of statements made by the public at the December 3, 2003 in which trail users said they would continue to use trails proposed for closure in restoration areas and would remove any fencing installed to discourage the use of closed trails.);
11. Explore innovative approaches to implementing habitat restoration proposals, such as working with sand and gravel operator(s) to extract sand from proposed habitat restoration areas in order to achieve hydrological conditions and ground elevations that promote the establishment of open water, riparian, or other wetland habitats. (This is how the City of San Diego created the riparian mitigation site immediately northwest of the new Dairy Mart Bridge);

Implementation of the Habitat and Trails Planning Project will require compliance with CEQA. To ensure adequate evaluation of potential impacts, the Service requests that the following information be addressed in the appropriate CEQA document:

1. Total length and width of trails currently recognized by the MOU;
2. Total length and width of other trails and roads currently being used in the TRVRP;
3. Total length and width of all new trails and roads being proposed;
4. Extent of trails and roads that could ultimately be planned for the Valley;
5. A description of existing habitat types found in the TRVRP, quantification of impacts to habitat types associated with new trail and road proposals;
6. Updated survey information for the least Bell's vireo, southwestern willow flycatcher, and coastal California gnatcatcher within the project boundary

to establish a biological baseline and evaluate existing and potential effects to these federally listed species;

7. Consistency determination of proposed projects with the City of San Diego MSCP Subarea Plan;
8. A cumulative impact evaluation that takes into consideration the impacts associated with all existing and proposed trails;
9. Specific mitigation measures proposed to offset any habitat losses (e.g., proposed habitat restoration areas can be a potential site for mitigation);
10. User groups that would benefit from the trails identified;
11. Activities that would be implemented to restore habitat within the proposed restoration areas;
12. Costs and long-term maintenance associated with trail and restoration projects, including clean-up of horse manure on trails (e.g. manure is a source of non-native seeds that can result in the spread of invasive, non-native plants through native habitat areas; manure also attracts the brown-headed cowbird which is known to parasitize the nests of the least Bell's vireo and coastal California gnatcatcher); and
13. An implementation schedule of all proposed projects and required mitigation measures.

The Service has provided these preliminary comments regarding the Habitat and Trails Planning Project early in the review process in an effort to assist the County in developing a habitat restoration and trail plan for the Valley that not only meets the needs of trail users, but also achieves the regional goals for protecting core resource areas and the sensitive species supported within these areas.

The Service, in large part through the efforts of Martin Kenney of my staff, has endeavored to establish a long-term cooperative relationship with the County with respect to planning efforts for public use development and land management within the Tijuana River Valley Regional Park. Significant accomplishments in terms of habitat protection have been made by the County in recent years, particularly with respect to land acquisition. The Service in turn has worked with the County and the equestrian community to insure the continuation of equestrian activities within the Valley in association with its mandate for endangered and threatened species recovery efforts. An important example of this cooperative effort is the MOU for Inter-Agency Trail Coordination. Although a vast majority of the floodplain lands in the Valley have been designated by the Service as critical habitat for the least Bell's vireo, the Service has worked with the County on various equestrian related projects in the Valley including a staging and parking area at the County ranger station adjacent to Hollister Road, trails for equestrian use adjacent to the ball fields south of International Road, a proposed parking and staging area adjacent to Dairy Mart Road, and a proposed new bridge for equestrians near the Effie-Mae property. The County now has the opportunity through the current planning effort to achieve a balance in the Valley between public use and habitat protection. As a means to achieve this balance, the County needs to promote more compatible and passive recreational uses in the Valley, such as photography,

wildlife observations, and natural resources education and interpretation. The Service looks forward to assisting the County in this effort. Our goal is to work cooperatively with the County and the public to achieve a reasonable and balanced approach to recreational use and habitat protection and restoration within the TRVRP. If you have any questions regarding this letter please contact Martin Kenney at (760) 431-9440 extension 252 and Carolyn Lieberman at extension 240.

Sincerely,

Therese O' Rourke
Assistant Field Supervisor

cc:
California Coastal Conservancy, Oakland, California (Attn: Jim King)
California Department of Fish and Game, San Diego, California (Attn: Libby Lucas)
County Supervisor, San Diego, California (Attn: Greg Cox)
California State Parks, Imperial Beach, California (Attn: Michael Wells)
San Diego Audubon Society, San Diego, California (Attn: Jim Peugh)

2411 Boswell Road
Chula Vista, CA 91914-3519

SDC 10/2.3-C

U.S. Customs and Border Protection

November 1, 2004

DIRECTOR'S OFFICE
NOV 0 4 2004
Parks and Recreation

Ms. Renee Bahl, Director
Department of Parks and Recreation
San Diego County
5201 Ruffin Road, Suite P
San Diego, California 92123

Re: Response to Notice of Preparation

Dear Ms. Bahl:

This is in response to the Notice of Preparation for the proposed Habitat Enhancement Project in the Tijuana River Valley Regional Park (TRVRP). You have already been notified, orally and in writing, of the current operational issues of the U. S. Border Patrol in the TRVRP. This correspondence is to inform you of future plans of the U. S. Border Patrol and the impact on the TRVRP.

Federal Law mandates that the Border Patrol build a Border Infrastructure System (BIS) on the border in an area that parallels the border, extending from the Pacific Ocean to a point 14 miles east of the coastline. Enclosed as Exhibit 1 is a map showing the proposed footprint of that project as it crosses County owned land. Your project as proposed would be in conflict with our directive from Congress within our project footprint. This footprint begins at the easternmost side of the County-owned land, commonly known as the Gravel Pit, extends across County-owned land to the westernmost boundary where the County-owned land meets the boundary of the California State Parks land. In addition to the project footprint, the Border Patrol will also be requiring access to the BIS through at least three points on County land. The access will be at the eastern end through Smugglers Canyon and through the road known as Sam's Drive. The westernmost access will be through the State Park lands. For more detailed information please refer to the July 2003 "Environmental Impact Statement for the Completion of the 14-mile Border Infrastructure System, San Diego, California." A copy of this report has previously been provided to the County Department of Parks and Recreation.

The proposed Border Infrastructure System is required for compliance with Title 1, Subtitle A, Section 102, of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996. Subsection 102(b), "Construction of Fencing and Road improvements in the Border Area near San Diego, California," specifically states: "The Attorney General shall provide for the construction along the 14 miles of the

international land border of the United States, starting at the Pacific Ocean and extending eastward, of second and third fences, in addition to the existing reinforced fence, and for roads between the fences" and "The Attorney General, while constructing the additional fencing under this subsection, shall incorporate such safety features into the design of the fence system as are necessary to ensure the well-being of border patrol agents deployed within or in near proximity to the system."

As you are aware, federal law authorizes Border Patrol Agents to access private lands within 25 miles of the border for the purpose of patrolling the border to prevent the illegal entry of aliens into the United States, see 8 U.S.C. 1357(a)(3). In addition, the BIS, as mandated by Congress, requires the Border Patrol to build the necessary roads and fences. As plans progress, the Border Patrol will keep the County informed.

In our view the completion of the BIS will be beneficial to the overall TRVRP. With the infrastructure in place we expect a measurable decrease in the number of illegal crossers, the agents will have less need to be in areas of critical habitat, and we will be able to abandon use of most roads, with returning vegetation a plus for the habitat in the area. Our efforts for environmental mitigation are more fully described in the July 2003 Environmental Impact Statement. Please refer to Exhibits 2, 3, and 4 for current operational deployment in the area of the TRVRP. Containing most operational activities within the area of the BIS, Exhibit 1, should improve the potential of plant and animal habitat in the proposed park area.

The Border Patrol is looking forward to working with San Diego County Department of Parks and Recreation as we both perform our missions in the area of the TRVRP. Please contact Assistant Chief Patrol Agent Andrew Jones at (619) 216-4001 if you have any questions.

Sincerely,

Paul Blocker, Jr.
Acting Chief Patrol Agent

Enclosures (4)

cc: Dianne Jacob, Chairman, San Diego County Board of Supervisors
Greg Cox, Supervisor, San Diego County Board of Supervisors

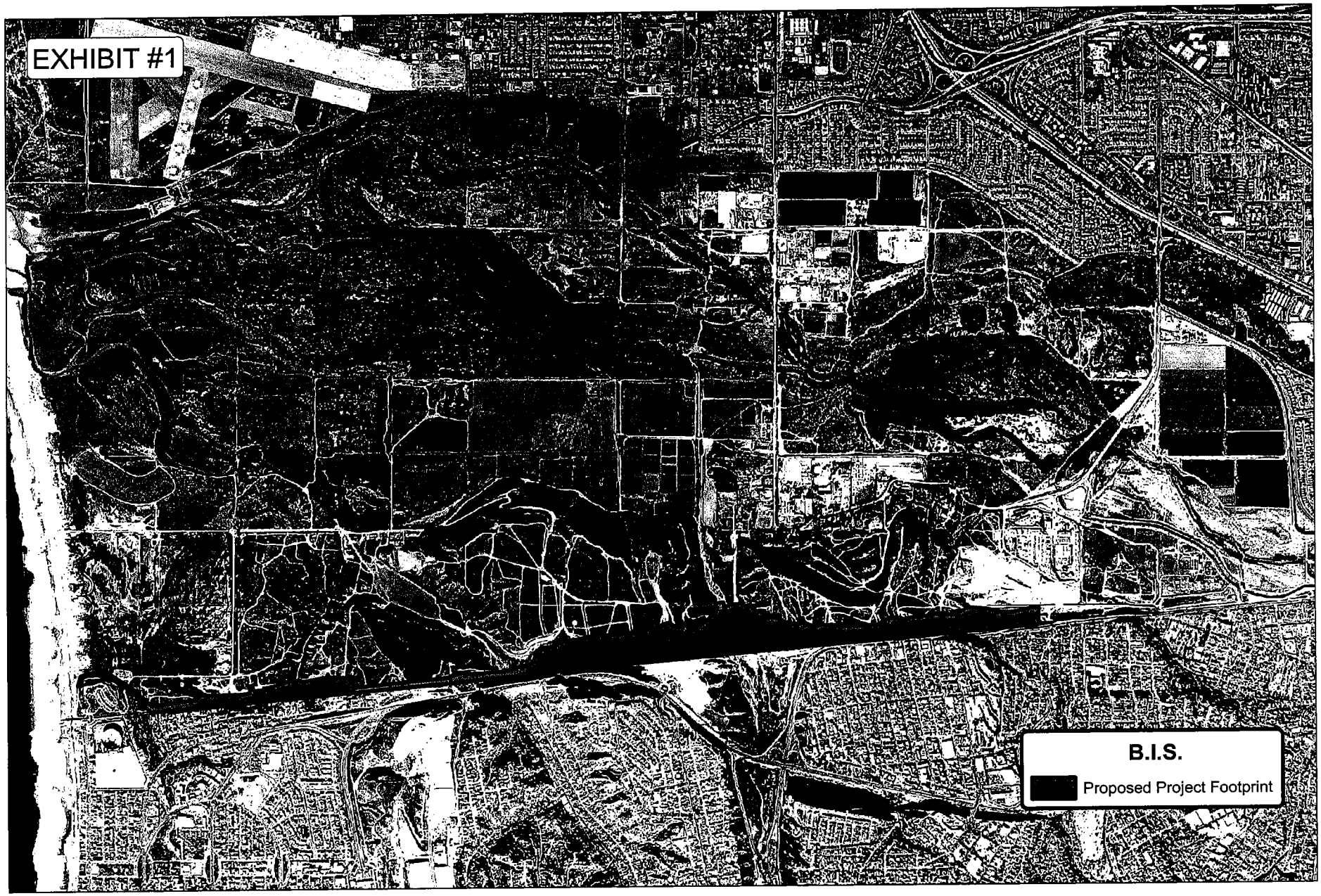
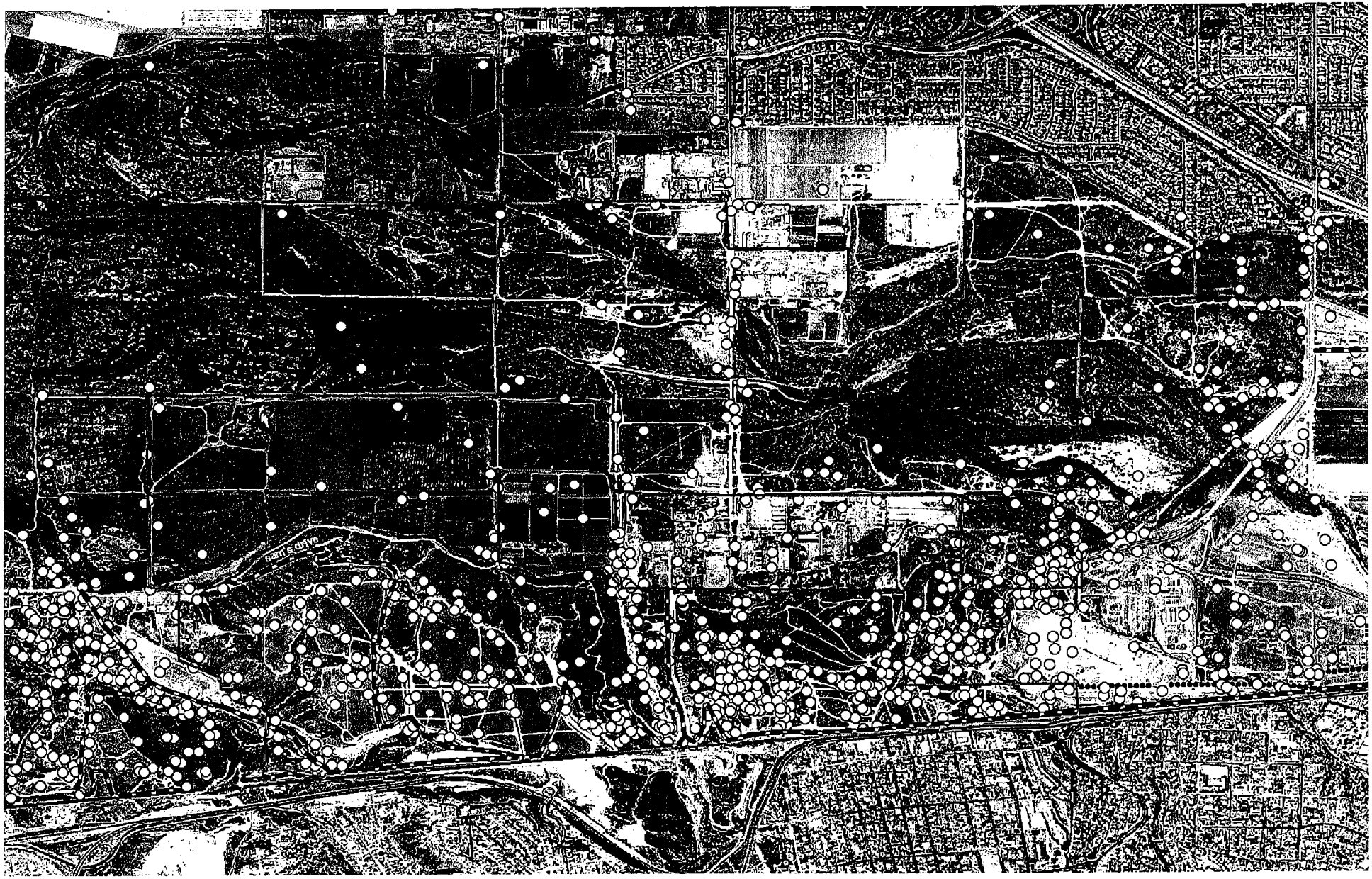


EXHIBIT #1
B.I.S.
Proposed Project Footprint

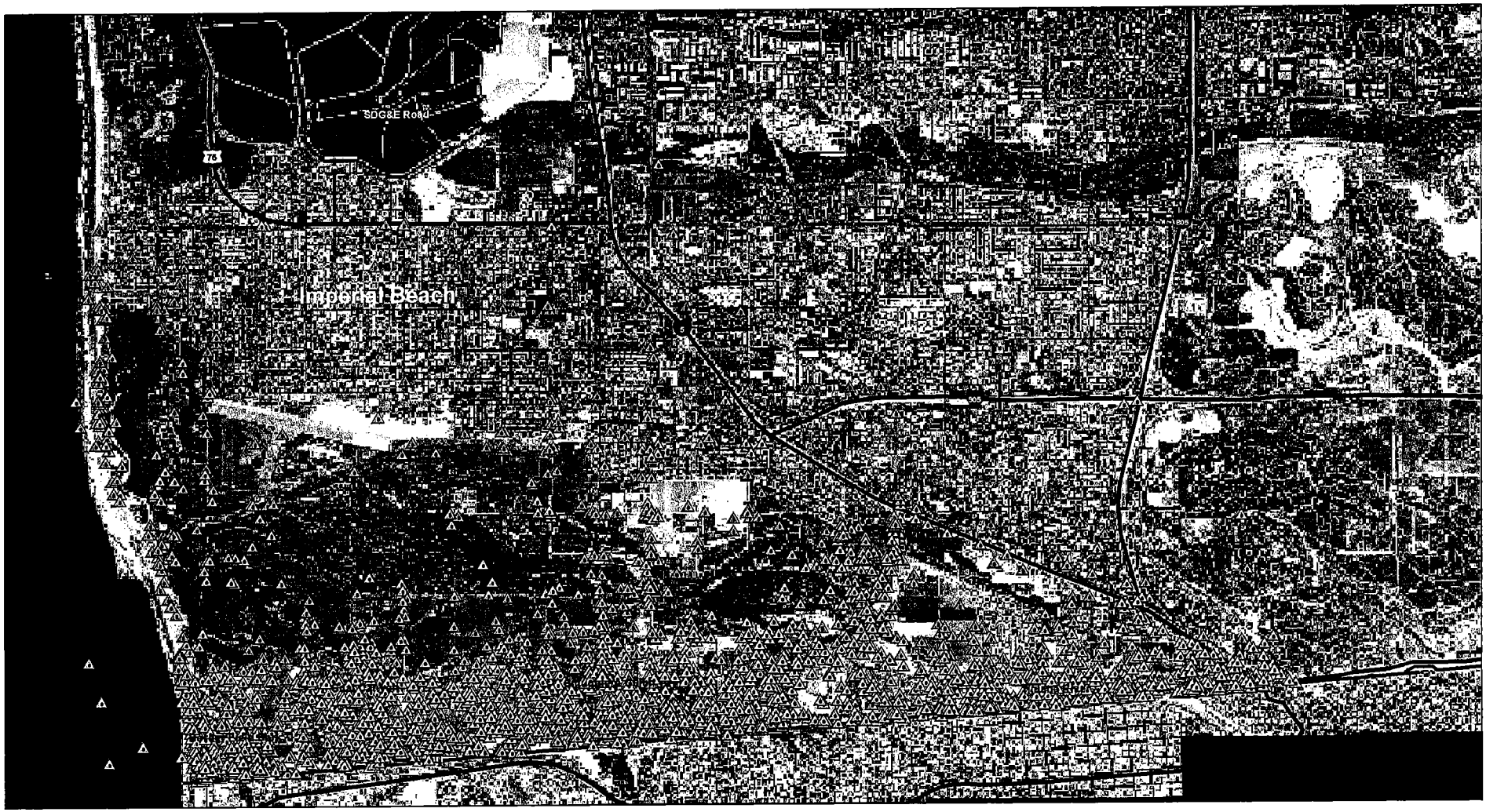
EXHIBIT # 2



(An apprehension event, may mean multiple arrests)

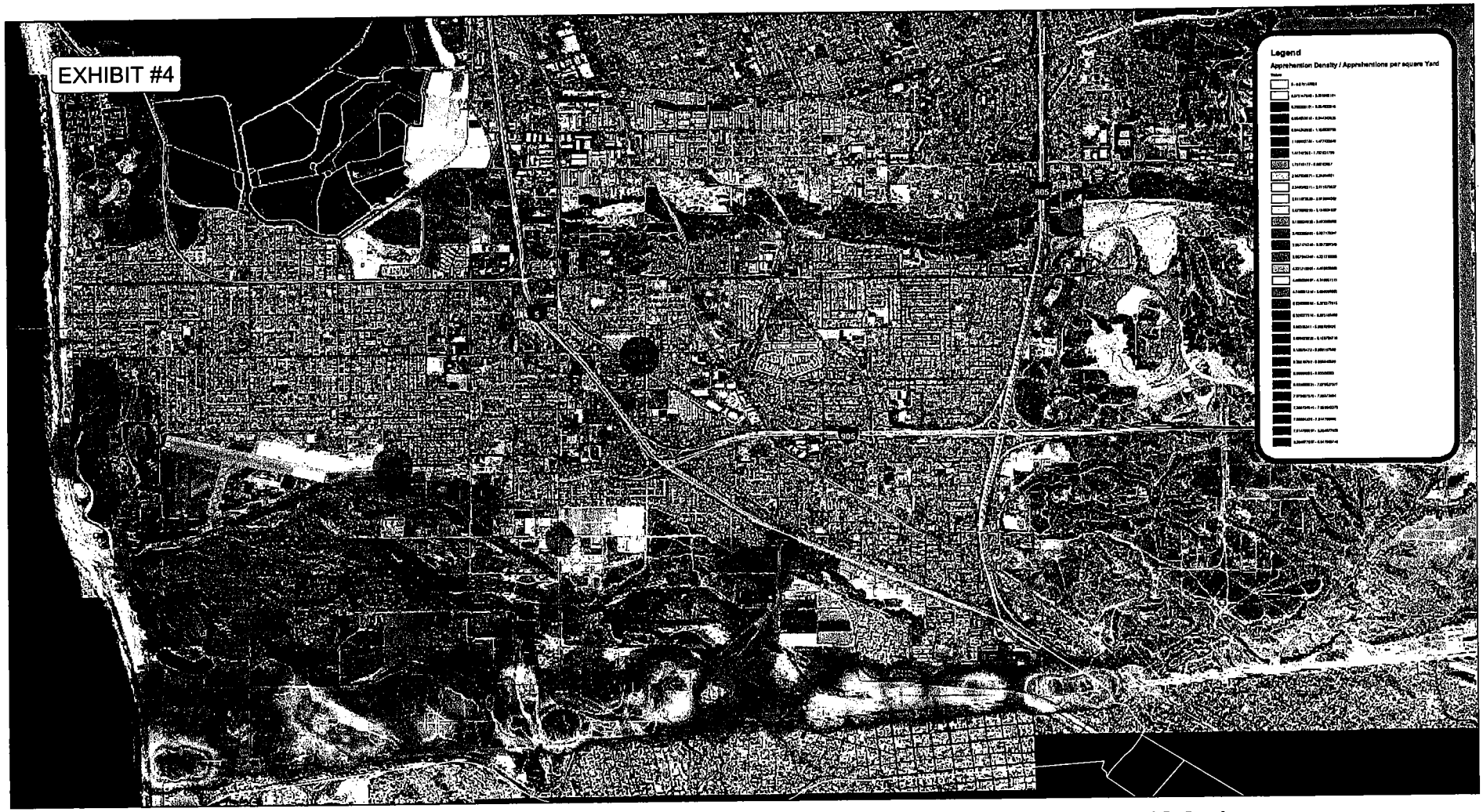
FY 04

EXHIBIT 3



0 0.5 1 2 Miles

I.B. Station
Apprehentions FY 04



I.B Station
Apprehention Density
FY 04

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

David.E.Brown@DHS.Gov
e-mail address (optional)

David E. Brown
Name

U.S. Border Patrol
Organization

1802 Saturn Blvd.
Street Address

(619) 662-7057
Daytime Phone No. (optional)

San Diego
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

On October 25, 2004 the U.S. Border Patrol attended the Scoping meeting. We request a meeting, as soon as possible, with the officials involved with the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project.

(Please see attached response)

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

U.S. Customs and
Border Protection

P.O.Box 68
Imperial Beach, CA 91933

October 25, 2004

Renee Bahl
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

Re: Response to Notice of Preparation

Dear Ms. Bahl:

This is in response to the Notice of Preparation for the proposed Trails and Habitat Enhancement Project in the Tijuana River Valley Regional Park [TRVRO] as put forth by the San Diego County Department of Parks and Recreation.

Mission and Authority

The mission of the United States Border Patrol is to safeguard the American homeland at and beyond the borders. The Border Patrol's primary responsibility is protecting the public against terrorists and the instruments of terror. The Border Patrol enforces many federal laws most of which are directly related to immigration. Congress has given the Border Patrol statutory authority to access, without a warrant, public and private lands within 25 miles of the border for the purpose of patrolling the border and conducting such activities as are customary, or reasonable and necessary to prevent the illegal entry of aliens into the United States of America. (8 U.S.C. 287, 1324, and1357)

Border Operations

The Imperial Beach Border Patrol Station conducts continuous operations within the area of the proposed TRVRP Habitat Enhancement Project. The station has

consistently deployed its agents in close proximity to the international boundary to deter illegal entry into the United States. Forward deployment has been the most effective enforcement strategy with the border infrastructure, as it currently exists. Agents in four-wheel drive and all terrain vehicles perform regular patrol duties using established border roads. These duties include high profile observation, sign cutting/tracking, and the interception and detention of criminal suspects.

Most border enforcement activities are conducted south of Monument Road where there is a good system of redundant north/south and east/west grid pattern of roads. However, Border Patrol Agents will work north of Monument Road when suspects are detected in the area. The landscape north of Monument is less conducive to efficient operations because of fewer roads and heavily wooded areas.

Impact of Proposal

Accessibility is one of the most critical needs for the Border Patrol in the area of the proposed project. Our operational aim is to be proactive rather than reactive. The current redundant pattern of roads allows us to be proactive and prevent illegal entries by assuming a deterrence posture or effecting an immediate apprehension after entry. Therefore, any new restrictions or road closures in areas north or south of Monument would impact operations in the most adverse way. Without this network of roads the agents lose the advantage and enforcement becomes infinitely less effective and more difficult. The consequences of failing to stop illegal entries at the border will negatively impact the Tijuana River Valley and local communities. (See exhibits A, B, and C)

Quality of Life in Local Community Affected: If the Border Patrol is denied the opportunity and mobility afforded by the present road system, alien and drug smuggling is less likely to be confined to the unpopulated areas near the border fence where an ever-present force of mobile agents is concentrated. This illegal activity would soon be seen on the streets, alleys, and backyards of neighborhoods in the City of Imperial Beach and the community of Nestor. People living in the neighborhoods west of Dairy Mart Road would be affected in the same way. The safety of those enjoying the recreational opportunities offered in the Tijuana River Valley would be jeopardized as smuggling and other illegal activity took place along trails and staging areas.

Migrants Victimized on U.S. Soil: A greater number of people seeking to enter the U.S. illegally will be attracted to the area if the Border Patrol's effectiveness diminishes due to road restrictions and closures. What occurred here during the middle to late 1980's and early 1990's prior to Operation Gatekeeper will likely occur again. During that period there was an unprecedented wave of crime and

violence near the border. This was the result of the presence of thousands of people congregating and traversing through areas of limited access. Areas where only trails existed became havens for bandits who preyed on the unsuspecting. Criminal activity such as armed robbery, rape, and murder were commonplace in the area of Spooner's Mesa, the Tijuana River bottom, Smugglers Gulch, and to the east. Even today, bandit activity on the U.S. side is rampant near the border in parts of Arizona. This is directly related to the large groups of people crossing illegally and the lack of adequate access to the border in many places. Again we would see the return of large numbers of people to this part of the border and the crime that goes with it. (See exhibits D, E, F, G, and H)

Environmental Degradation: During the period just prior to Operation Gatekeeper at least one-half million people crossed the border illegally every year between Border Field State Park and the San Ysidro Port Of Entry. Many undesirable conditions existed here as a result of this mass influx. This was clearly evidenced in the overall environmental degradation of the Tijuana River Valley. The many people transiting the area created trails and lay-up spots littered with clothes, plastic, paper, and human waste. Campfires and cigarettes started numerous brush fires. Even more tragic was the loss of human life when people attempted to cross the swift waters of the Tijuana River during years of heavy rain.

Summary

The United States Border Patrol is not opposed to many aspects of the enhancement project under consideration. Many components of the project do not reduce the efficiency of Border Patrol operations in any significant way. The Border Patrol is very concerned about possible road closures or road restrictions north and south of Monument Road under this proposal. The negative result of this action to the community and possibly to the nation cannot be overstated. This is still a very active border area. In FY 2004, the Imperial Beach Border Patrol Station made over 8,000 apprehensions including nearly 170 felony criminal arrests. Half of the total apprehensions occurred within the boundaries of the TRVRP. Some of those apprehended have been from "special interest" countries, that is countries the Department of Homeland Security has deemed as having some nationals who are a potential terrorist threat to the United States. America is engaged in a global war on terror. Its enemies are looking for the opportunity to penetrate the borders to hurt America's people and economy.

The Border Patrol urges the San Diego County Department of Parks and Recreation to keep open all existing roads in the Tijuana River Valley Regional Park. It strongly recommends against any plan to narrow, block, or gate these roads. Actions of this sort would effectively dismantle Operation Gatekeeper in

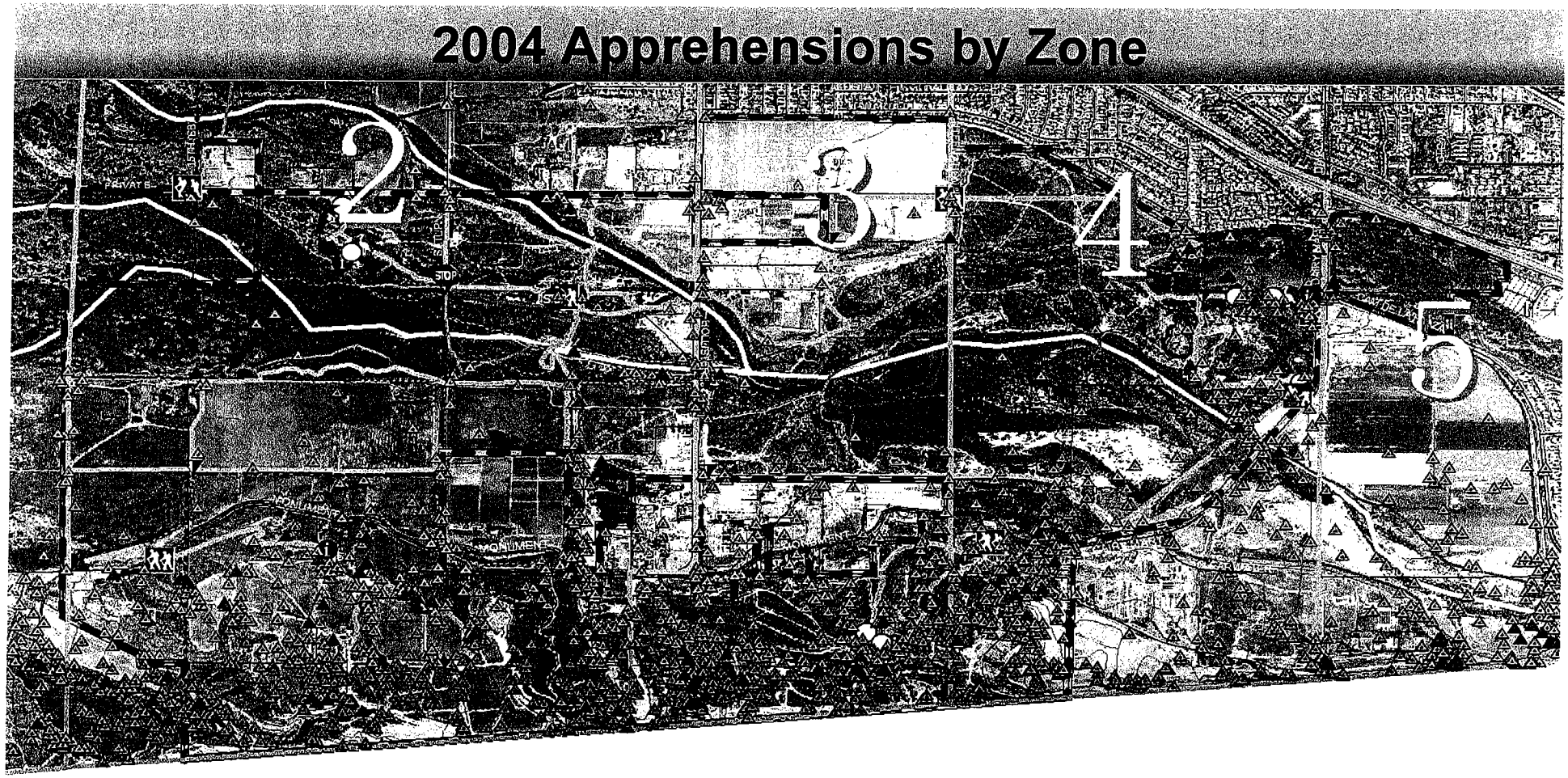
this part of the border. (See exhibits I, J, and K) The Border Patrol recommends the use of signs to restrict vehicle access to the public on Regional Park roads if the goal is to limit motorized access.

The United States Border Patrol looks forward to working with your department on this issue. Please contact us if you have any questions.

Sincerely,

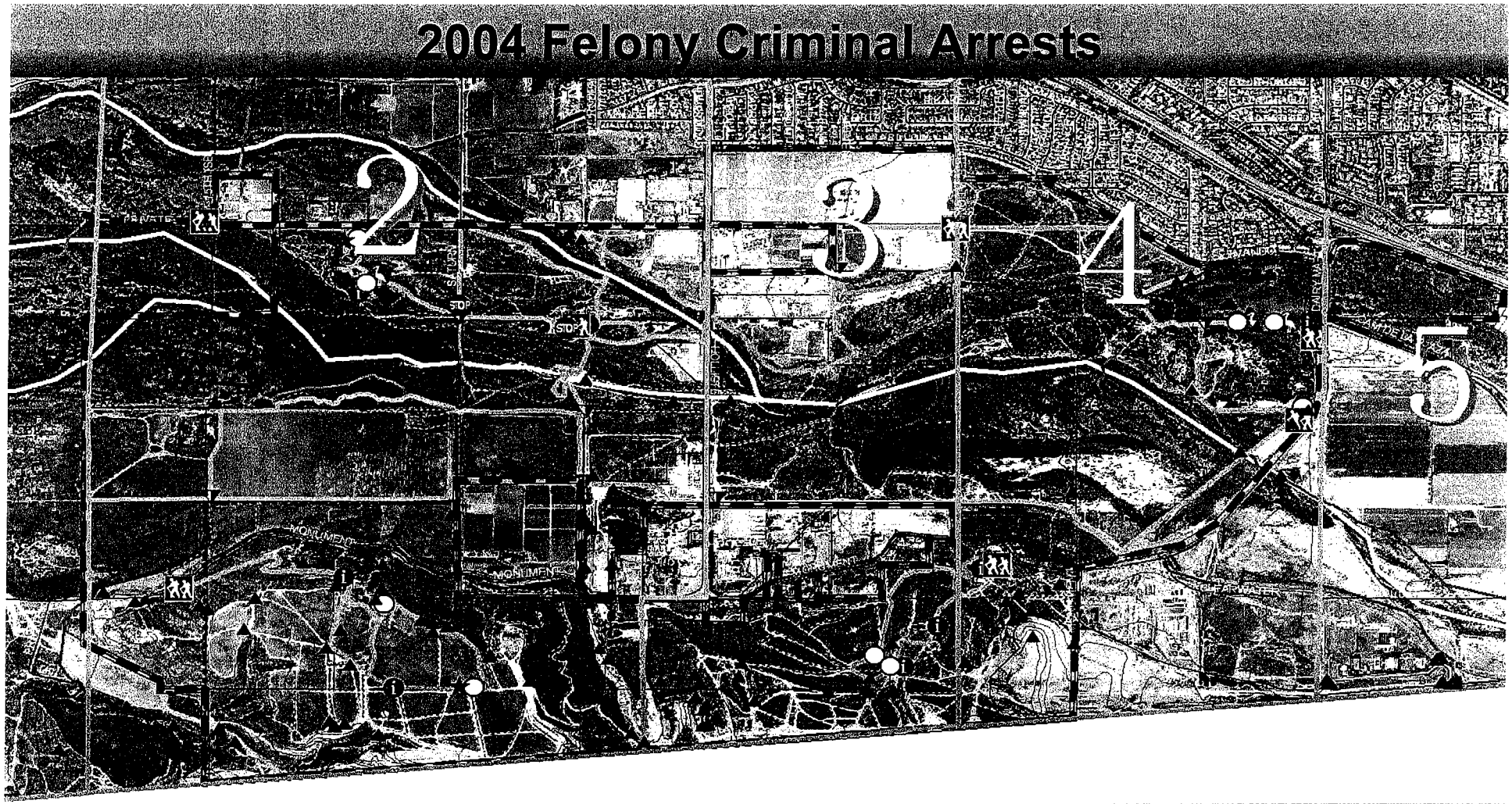
David E. Brown
Patrol Agent In Charge

Attachments (11)



In this overlay of the TRVRP, each blue triangle represents the point of apprehension of an individual or groups of individuals that have crossed the U.S. border illegally during FY 2004. Border Patrol records show 4,217 apprehensions for this period in the enforcement zones depicted above.

EXHIBIT A



In this overlay of the TRVRP, each red triangle represents the point of apprehension made on criminal felons that crossed the U.S. border illegally during FY 2004. Border Patrol records show 167 apprehensions for this period in the enforcement zones depicted above.

EXHIBIT B

Proposed Road Closures Would Adversely Impact Border Patrol Operations

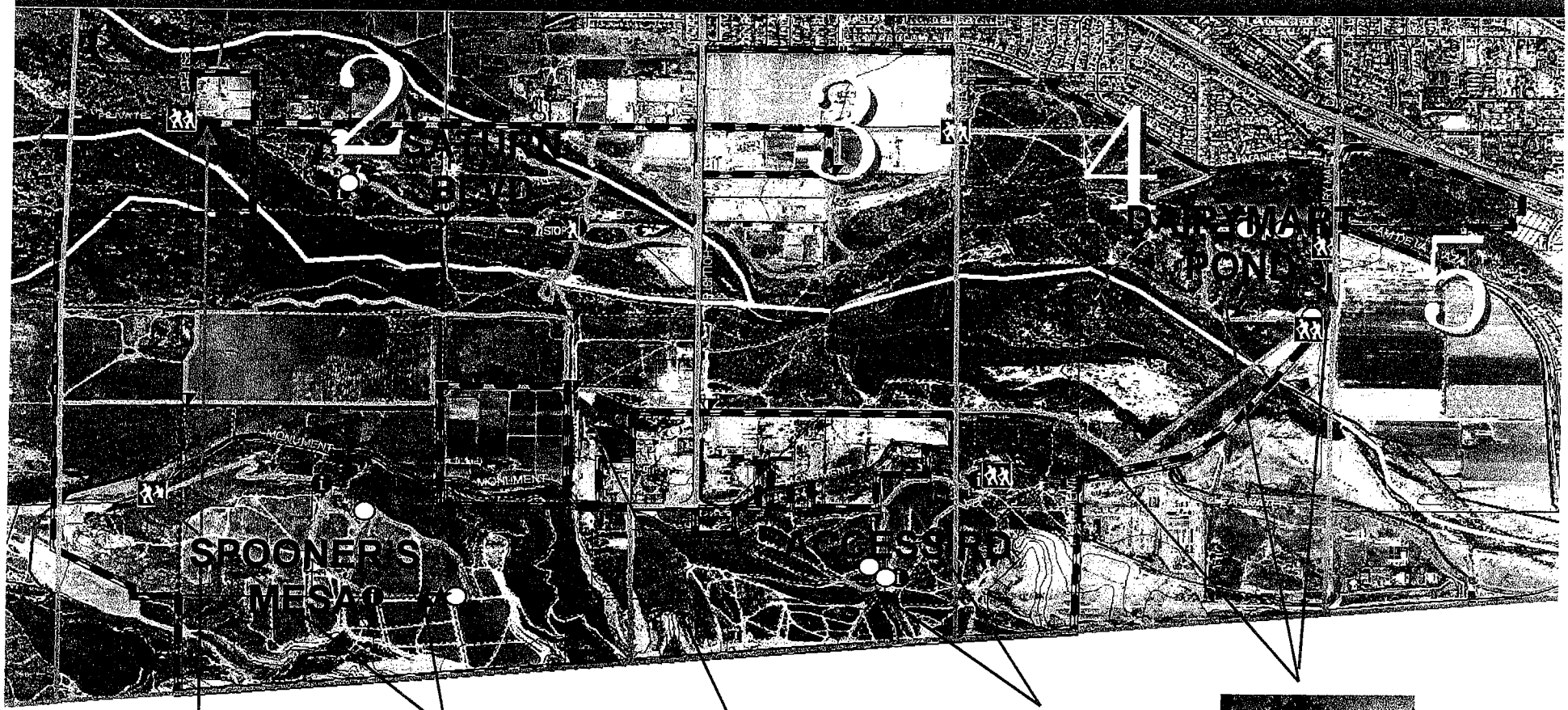


EXHIBIT C

OPERATION GATEKEEPER

Imperial Beach Station
Yearly Apprehension

1992	202,372
1993	165,514
1994	187,019
1995	120,644
1996	74,982
1997	27,865
1998	15,832
1999	15,974
2000	19,815
2001	15,480
2002	11,407
2003	10,266
2004	8,351

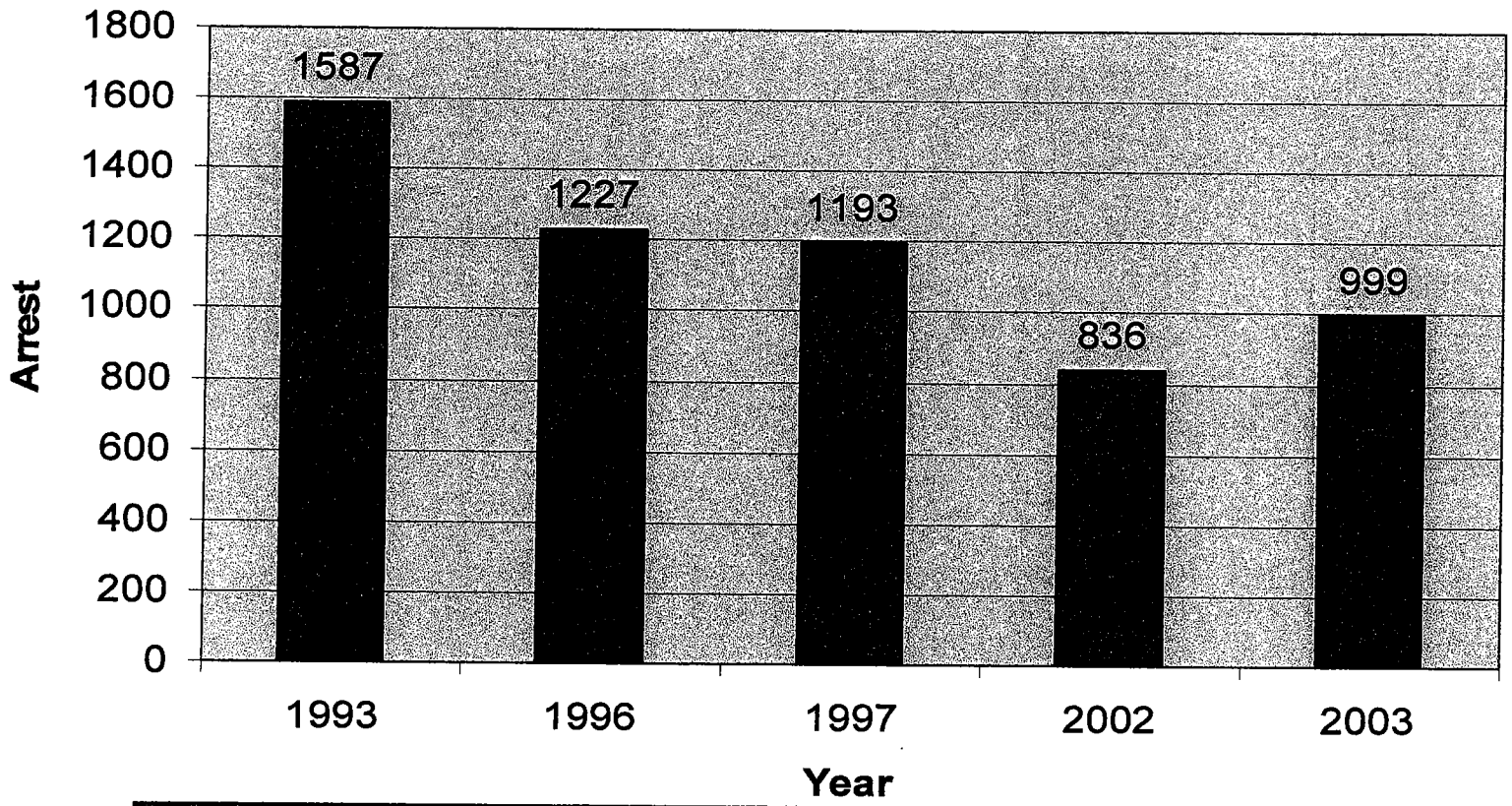
Primary Border Fence and Road Enhancements Begin

First Year of Operation Gatekeeper Yields Dramatic Results

The continued success of Operation Gatekeeper is seen in the yearly decline of apprehensions in the Imperial Beach Station area of operations. The U.S. Border Patrol's Imperial Beach Station is responsible for the land border between the the Pacific Ocean and the San Ysidro Port Of Entry. The Tijuana River Valley Regional Park covers nearly half of the Imperial Beach Station's area of operations.

EXHIBIT D

Imperial Beach Sheriffs Crime Statistics
City of Imperial Beach

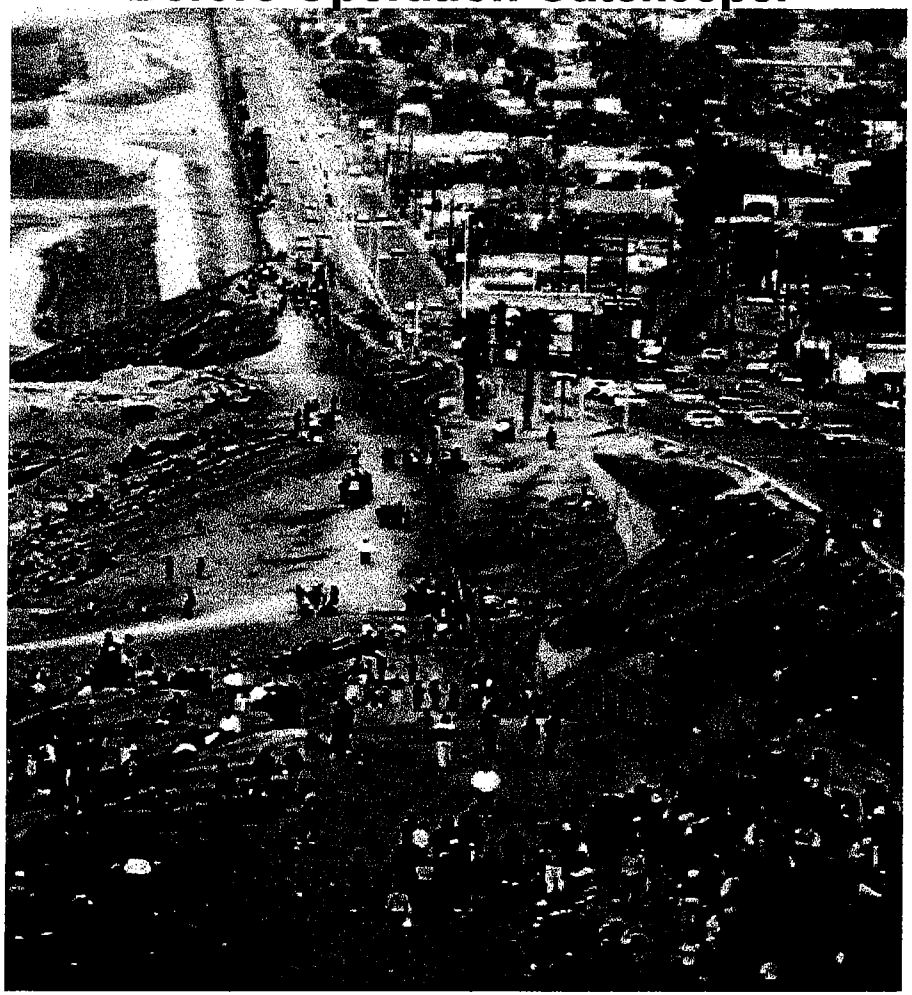


[redacted]

EXHIBIT E

Eastern Edge of TRVRP at the Border

Before Operation Gatekeeper



After Operation Gatekeeper

EXHIBIT F

Access and Infrastructure Critical to the U.S. Border Patrol Mission

EXHIBIT G

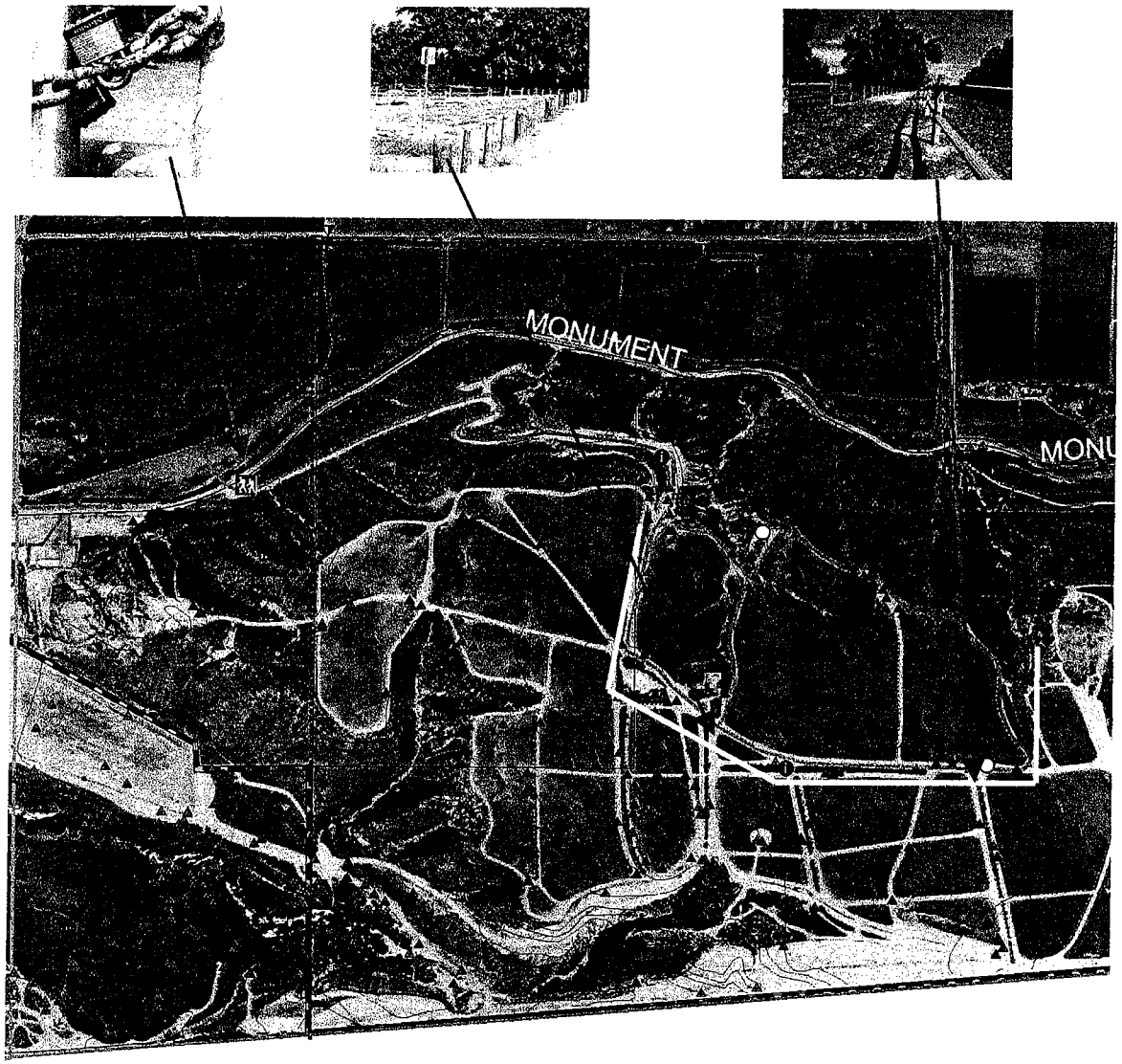
Impact of Operation Gatekeeper in the TRVRP Area

Before Operation Gatekeeper

After Operation Gatekeeper

EXHIBIT H

Spooner's Mesa: Popular Site of Illicit Border Incursions

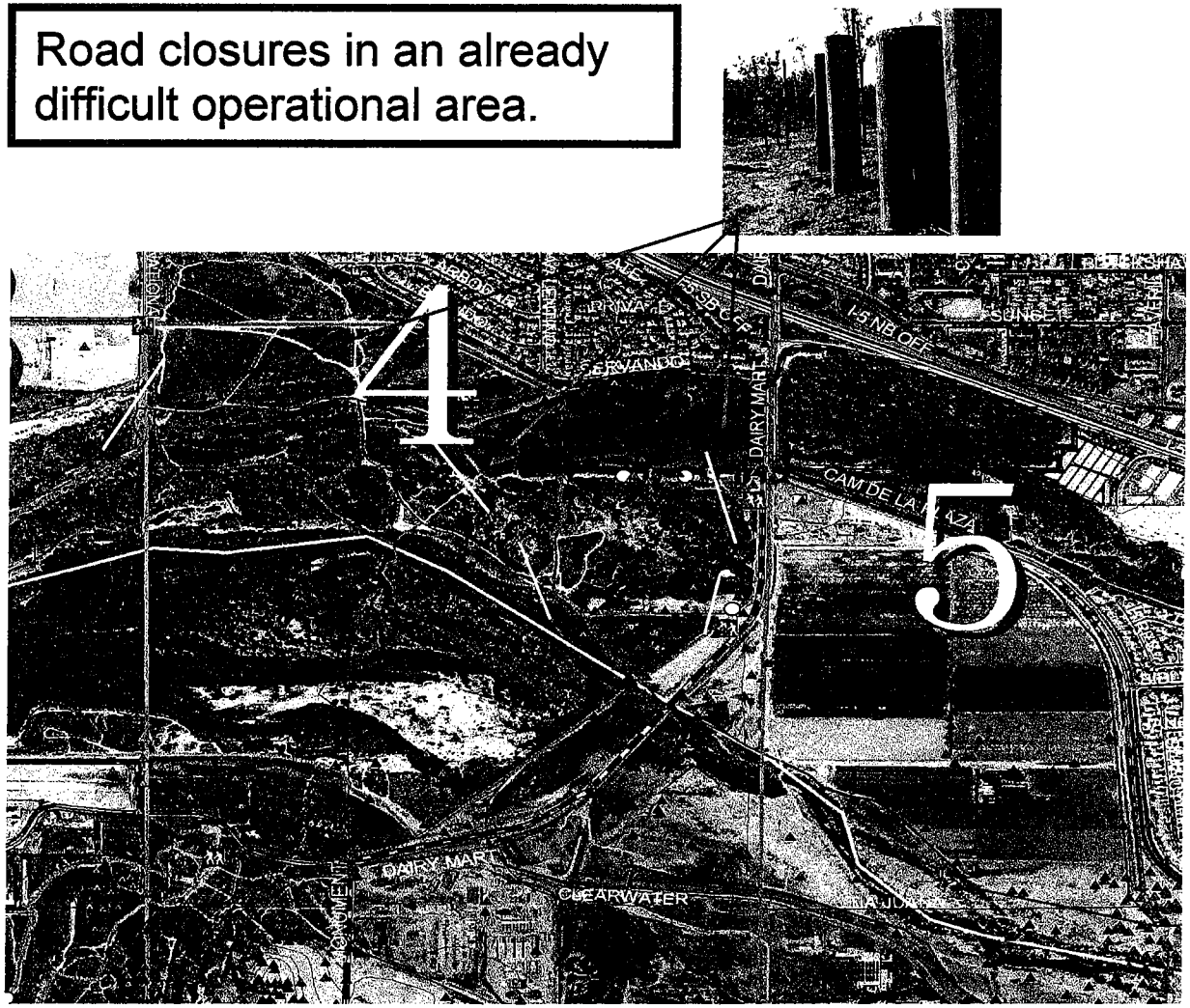


Under the proposed TRVRP Enhancement Project many existing roads would be converted to six foot wide multi-use trails. Fences, gates, poles, and other barriers would be used to restrict vehicular traffic. Border Patrol access and mobility would be considerably limited on Spooner's Mesa and operational effectiveness seriously compromised under this plan.

EXHIBIT I

Neighborhoods Would Suffer Under TRVRP Plan

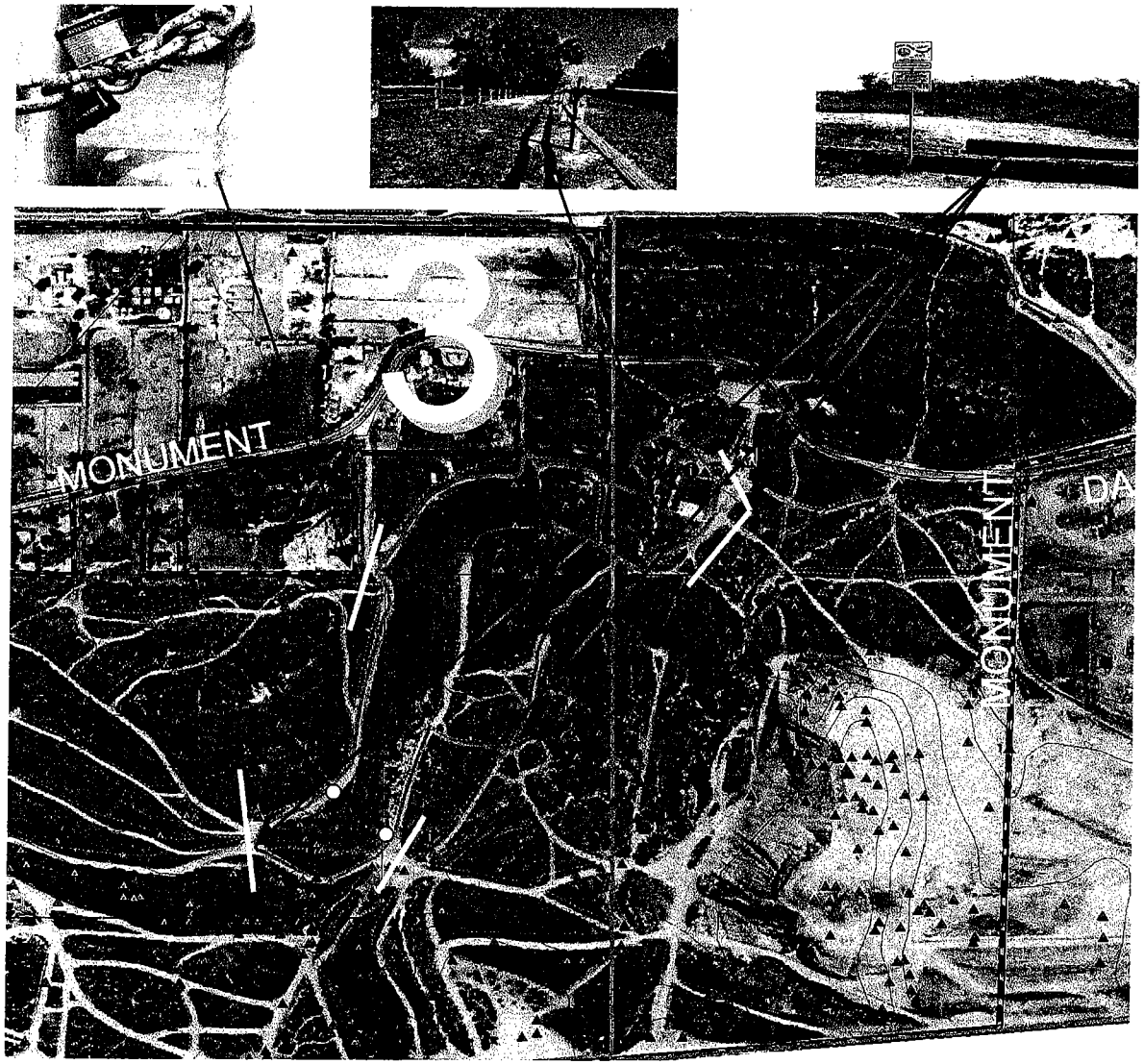
Road closures in an already difficult operational area.



The Dairy Mart Ponds area is a convergence point for many who have eluded apprehension closer to the border. This is the last opportunity for the Border Patrol to make an arrest before suspects enter the neighborhoods to the north.

EXHIBIT J

TRVRP Plan Closes Some of the Border Patrol's Most Important Roads



The trail loop in this overlay is created in part by closing several existing roads that help the U.S. Border Patrol perform its law enforcement duties. This particular trail would cut off access to the most important observation point for the Border Patrol's infrared scope. This sight alone helps agents control over three miles of international border.

EXHIBIT K

2411 Boswell Road
Chula Vista, CA 91914-3519

SDC 10/2.3-C

U.S. Customs and Border Protection

November 1, 2004

DIRECTOR'S OFFICE
NOV 0 4 2004
Parks and Recreation

Ms. Renee Bahl, Director
Department of Parks and Recreation
San Diego County
5201 Ruffin Road, Suite P
San Diego, California 92123

Re: Response to Notice of Preparation

Dear Ms. Bahl:

This is in response to the Notice of Preparation for the proposed Habitat Enhancement Project in the Tijuana River Valley Regional Park (TRVRP). You have already been notified, orally and in writing, of the current operational issues of the U. S. Border Patrol in the TRVRP. This correspondence is to inform you of future plans of the U. S. Border Patrol and the impact on the TRVRP.

Federal Law mandates that the Border Patrol build a Border Infrastructure System (BIS) on the border in an area that parallels the border, extending from the Pacific Ocean to a point 14 miles east of the coastline. Enclosed as Exhibit 1 is a map showing the proposed footprint of that project as it crosses County owned land. Your project as proposed would be in conflict with our directive from Congress within our project footprint. This footprint begins at the easternmost side of the County-owned land, commonly known as the Gravel Pit, extends across County-owned land to the westernmost boundary where the County-owned land meets the boundary of the California State Parks land. In addition to the project footprint, the Border Patrol will also be requiring access to the BIS through at least three points on County land. The access will be at the eastern end through Smugglers Canyon and through the road known as Sam's Drive. The westernmost access will be through the State Park lands. For more detailed information please refer to the July 2003 "Environmental Impact Statement for the Completion of the 14-mile Border Infrastructure System, San Diego, California." A copy of this report has previously been provided to the County Department of Parks and Recreation.

The proposed Border Infrastructure System is required for compliance with Title 1, Subtitle A, Section 102, of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996. Subsection 102(b), "Construction of Fencing and Road improvements in the Border Area near San Diego, California," specifically states: "The Attorney General shall provide for the construction along the 14 miles of the

international land border of the United States, starting at the Pacific Ocean and extending eastward, of second and third fences, in addition to the existing reinforced fence, and for roads between the fences" and "The Attorney General, while constructing the additional fencing under this subsection, shall incorporate such safety features into the design of the fence system as are necessary to ensure the well-being of border patrol agents deployed within or in near proximity to the system."

As you are aware, federal law authorizes Border Patrol Agents to access private lands within 25 miles of the border for the purpose of patrolling the border to prevent the illegal entry of aliens into the United States, see 8 U.S.C. 1357(a)(3). In addition, the BIS, as mandated by Congress, requires the Border Patrol to build the necessary roads and fences. As plans progress, the Border Patrol will keep the County informed.

In our view the completion of the BIS will be beneficial to the overall TRVRP. With the infrastructure in place we expect a measurable decrease in the number of illegal crossers, the agents will have less need to be in areas of critical habitat, and we will be able to abandon use of most roads, with returning vegetation a plus for the habitat in the area. Our efforts for environmental mitigation are more fully described in the July 2003 Environmental Impact Statement. Please refer to Exhibits 2, 3, and 4 for current operational deployment in the area of the TRVRP. Containing most operational activities within the area of the BIS, Exhibit 1, should improve the potential of plant and animal habitat in the proposed park area.

The Border Patrol is looking forward to working with San Diego County Department of Parks and Recreation as we both perform our missions in the area of the TRVRP. Please contact Assistant Chief Patrol Agent Andrew Jones at (619) 216-4001 if you have any questions.

Sincerely,

Paul Blocker, Jr.
Acting Chief Patrol Agent

Enclosures (4)

cc: Dianne Jacob, Chairman, San Diego County Board of Supervisors
Greg Cox, Supervisor, San Diego County Board of Supervisors

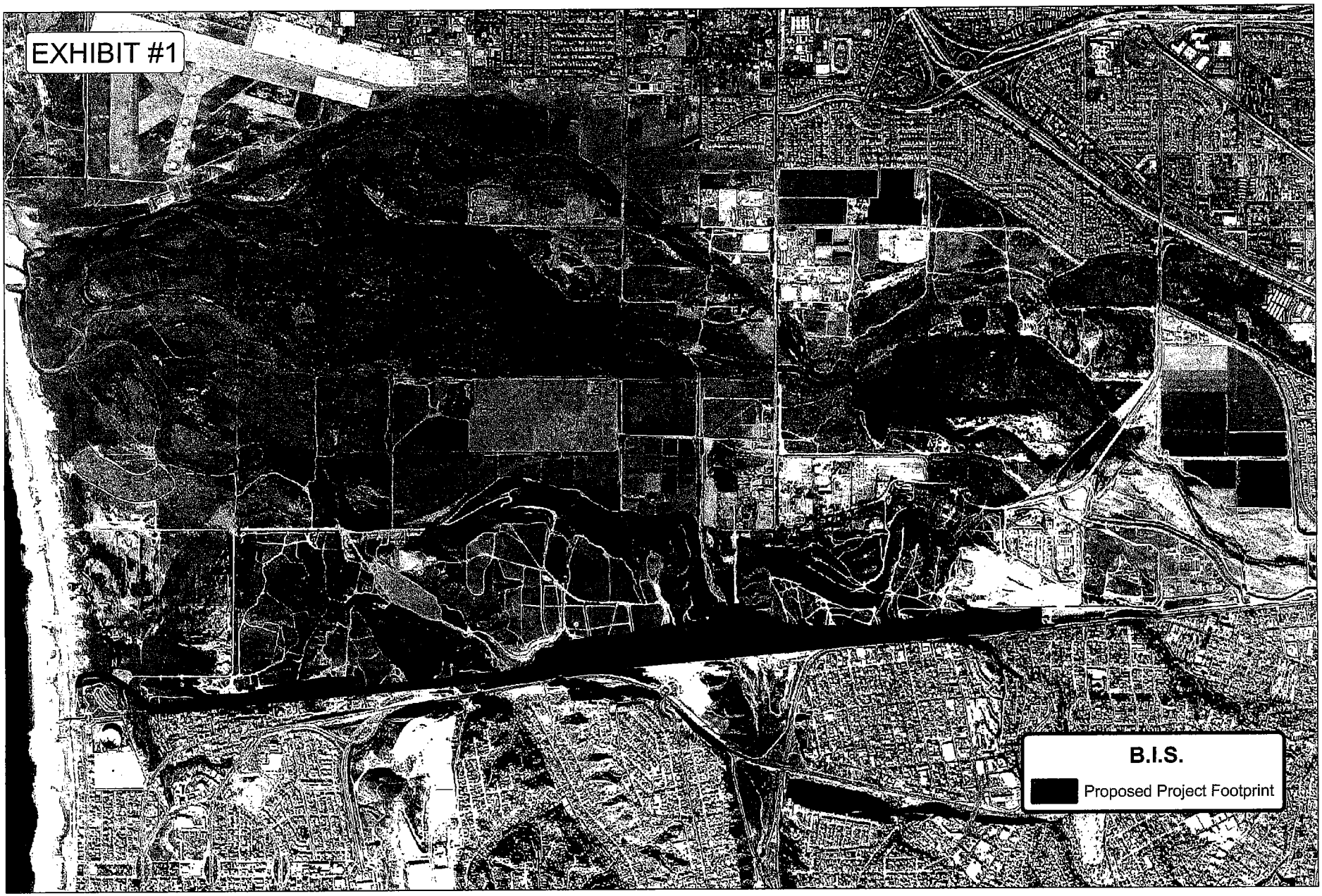
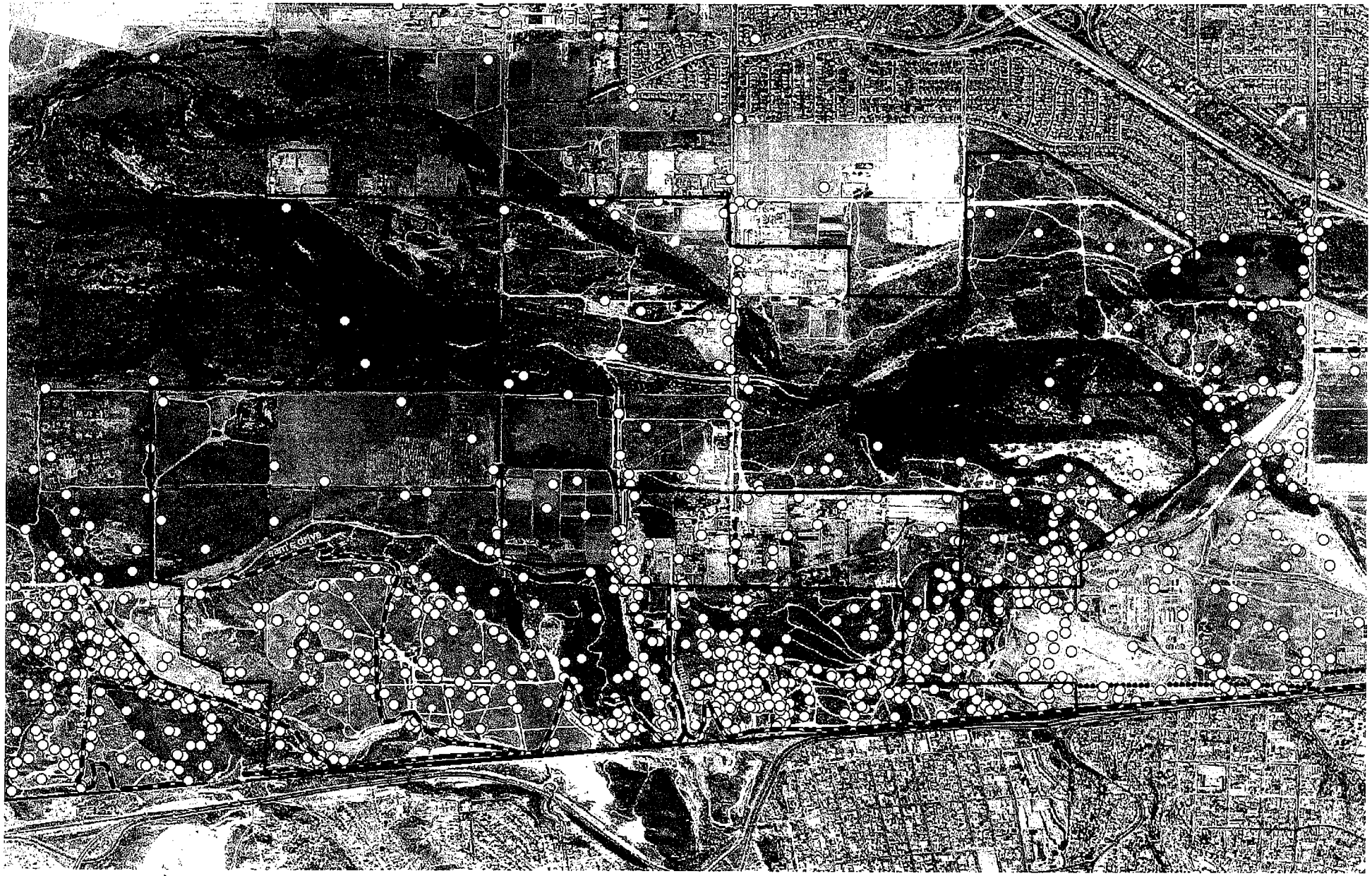


EXHIBIT #1
B.I.S.
Proposed Project Footprint

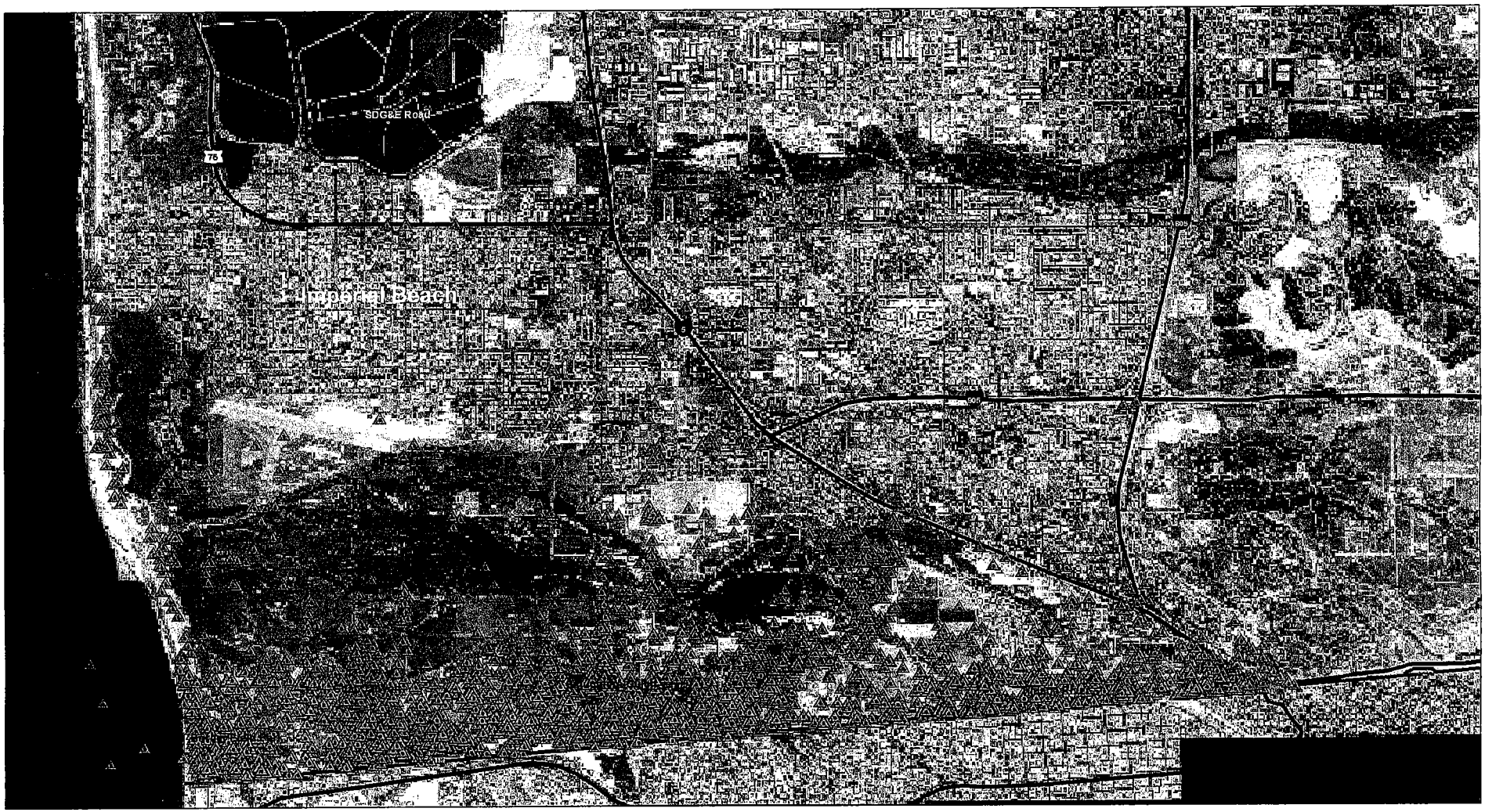
EXHIBIT # 2



(An apprehension event, may mean multiple arrests)

FY 04

EXHIBIT 3



0 0.5 1 2 Miles

I.B. Station
Apprehentions FY 04

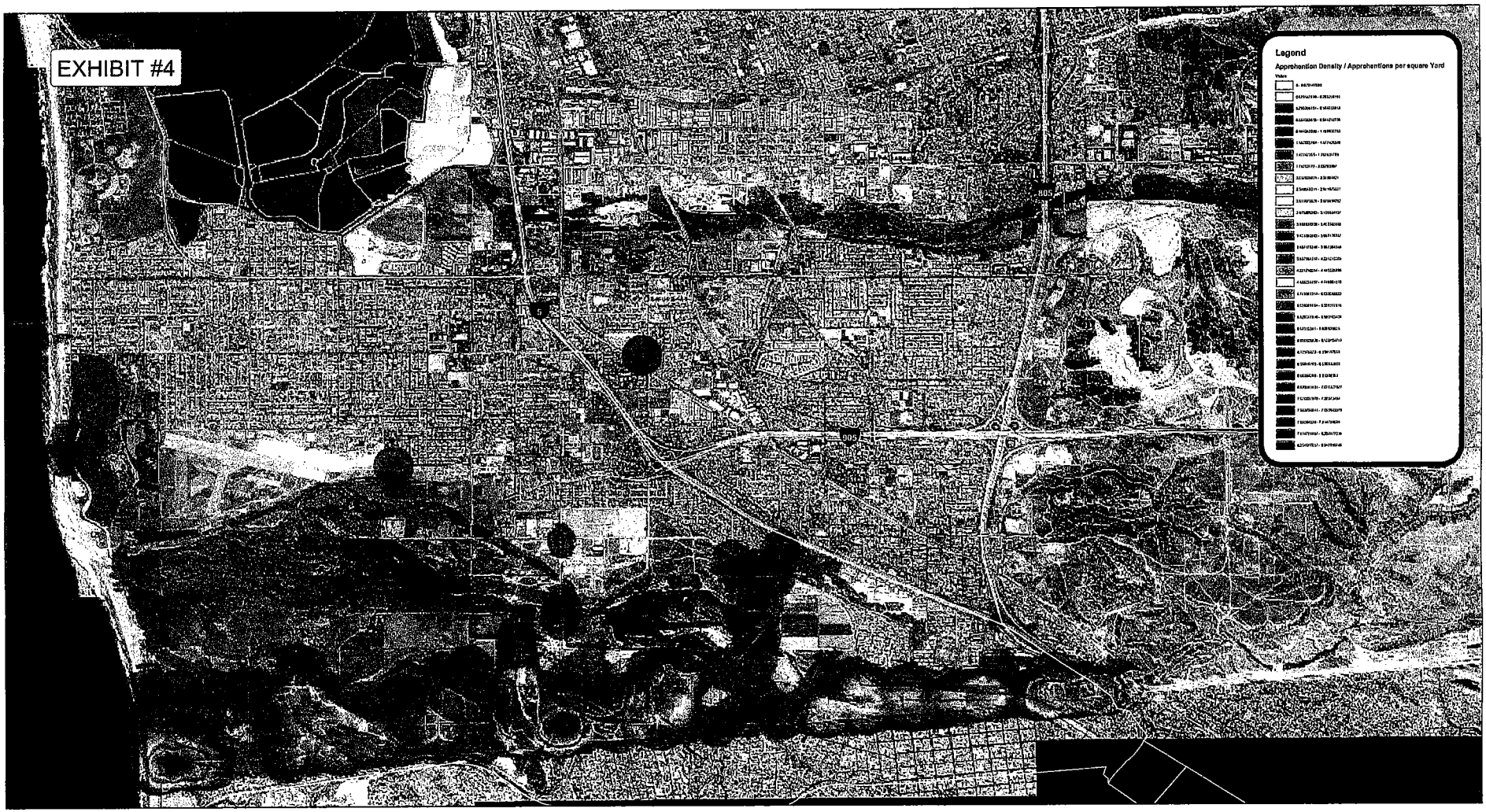


EXHIBIT #4
Legend
Apprehention Density / Apprehentions per square Yard
Value
0 0.45 0.9 1.8 Miles
N
W
E
S
I.B Station
Apprehention Density
FY 04

RICHARD TYNAN
PRESIDENT
TIJUANA RIVER VALLEY EQUESTRIAN ASSOCIATION
(TRVEA)
2810 HOLLISTER STREET
SAN DIEGO, CA. 92154
619 428-2214

2004 NOV 4 PM 2 58

November 3, 2004

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego. Ca. 92123

Tijuana River Valley Regional Park
Trails and Habitat Enhancement Projects
Draft Environment Impact Report (EIR)

COMMENTS:

VALLEY LAND:

Horsemen are a huge element in the history of our country, including the Tijuana River Valley. Father Sierra traveled through Smugglers Gulch to San Diego. The Algun Indians traveled from Tijuana through San Ysidro and then along the Tijuana River to San Diego. This entire historic trail that lies within your park map will be eliminated and lost forever. The proposed map does not seem to address the historical value or present and future interests of the community.

TRAILS:

The trails map that was proposed on October 25, 2004 for the Tijuana River Valley Regional Park, Trails and Habituate Enhancement Project proposes to eliminate over 50% of Equestrian Trails in the Tijuana River Valley Trails that were approved by memo of understanding by stakeholders and users in the early 1990's. The rights of equestrians should not be compromised due to the fact the County and elected officials did not finalize the (MOU) process.

This land is available for use by equestrians because tax dollars paid for it; the equestrians have preserved and maintained it for many years. It is inconceivable to expect the equestrian community to loose their right to use the trails because of bias and unsubstantiated claims from the rich and powerful environmental community. The proposed trail map eliminates all the beautiful winding majestic trails and gives us the long dusty roads used for decades by farmers and the Border Patrol. It has been a long standing belief in the equestrian community the TRVRP was aimed at preserving, providing and improving a much-needed recreational land area for man and his horse. The opportunity to share the history, unique beauty and serene atmosphere of the trails with our children, family, friends, distant neighbors, and handicapped, will be lost forever.

HABITAT:

Almost three decades ago Mr. Jorgensen, a park employee, discovered the Least Bell's Vireo nesting in the Tijuana River Valley, and documented two females and four males, at the last count in 2004 there were 403 females and an undermined amount of males, this nullifies the claim of," habitat degradation ", especially when you consider the trails have been loved, cleaned, and groomed by the equestrian community. In the past when the Least Bell's Vireo was nesting, equestrians were asked to use alternate trails and in doing so the Vireo followed, the fact the project map shows most of the Vireo nests are directly adjacent to trails substantiates this fact. By removing the trails it could damage and seriously alter one of the most successful recoveries under the Endangered Species Act.

Border Patrol:

All access roads now being used by the Border Patrol in the Tijuana River Valley Regional Park are a necessary element to the continued success of Operation Gatekeeper. Denying the Border Patrol easy access to the areas they patrol and protect puts all people at risk. In an unprotected area in the Tijuana River Valley illegal's would target for passage to the north and west leaving trash and real destruction to habitat lands. Access Roads can also be used for emergency vehicles and as an escape lane for ranchers and their livestock. The Border Patrol is the caretaker and protector of all the people in the Tijuana River Valley and their access needs must be respected by the San Diego Department of Parks and Recreation.

Thank You for your attention on these important issues;

Richard Tynan
President
Tijuana River Valley Equestrian Association
(TRVEA)

November 1, 2004

2004 NOV 4 Dear 03 Maeve Hanley and the San Diego
2004 NOV 4 PM 3 03
Department of Parks and Recreation,

It has recently come to my attention that a project is being planned called the Trails Habitat Enhancement Project in the Tijuana River Valley Regional Park. I have been informed that the project plan eliminates all equestrian trails as they are now known including Sherwood Forest, Cathedral Trail, Brian's Bridle Trail and Wycliff Trail. I ride my horse on these trails about three times a week and do not want to loose them. There are several reasons why the equestrian trails should be kept as they are in the Tijuana River Valley. Here is a list of reasons:

1. Horses discourage predators from the trail area encouraging some species including the Least Bell's Vireo, an endangered bird, to nest next to trails.
2. Presence of trails and equestrians discourage transients from making shelters and setting up shacks and other living quarters in the TRV (Tijuana River Valley).

3. Equestrians are the eyes and ears of the TRV. This discourages illegal uses of the TRV such as drug trafficking, use of off-road motorized vehicles, vandalism, paint ballers, gun enthusiasts, etc.
4. Offers a way to see the beauty of nature: birds and other wildlife.
5. There has been a history of horses in the TRV since 1769.
6. The CCC Grant was for trail enhancement NOT elimination.
7. The ecologists are influencing our government against horsemen.
8. There is no proof that the horse trails have any negative effect on the habitat.
9. There are more birds in the TRV now with the trails than there were 20 years ago.
10. TRV Water District contributed $1.5 million to the SDC.P&R for passive and active use of the TRV not habitate.
11. The Base Document must include horse trails - it is in the covenant with the trust holders of the TRV.

12. The 71 miles of trails the county accuses us of having does not differentiate between the MOU trails and those made by renegades and illegals and other non-equestrians.
13. There are underprivileged and disabled people that depend on horses and the trails for therapy.
14. This is not Del Mar or Rancho Santa Fe, The South Bay is a working class area where there are limited recreational outlets and opportunities. Affordable horse facilities and trails are needed.
15. At the County presentation, a county speaker showed a slide of an equestrian trail stating what a "precious resource" it is. The slide was a shot of Brian's Cathedral Trail - one of the eliminated trails.
16. Witnessing eco-terrorism. An eco-terrorist believes "The only good habitat is one without any uses by mankind or horses."
17. Status quo is <u>not</u> detrimental to habitat. There are more species near the trails than far away from the trails.

18. Equestrian recreation needs to be expanded.
    a. Add overnight horse camping with porta-potties, water, corrals.
    b. Keep porta-potties at staging areas, community arena, horse camps.
    c. Have horse watering trough at staging areas, community arena and horse camp..
    d. Build a community arena with bleachers similar to those at ball fields.
19. Connect the equestrian trails with the Otay Regional Park Trail System.
20. Horses contribute to the local economy: boarding businesses, farriers, vets, feed stores, trainers, riding instructors among others.
21. Cost of making 14+ miles of multi-purpose trail and maintaining them following annual flooding would be prohibitive. Current equestrian trails are primarily maintained by volunteers in the local equestrian association thus of negligible financial impact.

22. Include in the project a plan to encourage, welcome and facilitate the U.S. Border Patrol use of trails, paths and roads in the TRVRP. There is a huge safety issue that the Border Patrol mitigates. ~~They~~ They assist us with horse desensitizing on the trail as well as assist in emergency and law enforcement situations.
23. Have in the plan the continued growth of new equestrian trails as the need arises.
24. There is no data to prove a negative effect of the existing equestrian trails. Nor is there any data or research to show what impact on the habitat the proposed 6 foot wide multi-use trail will have.
25. There are currently laws - both Federal and State - ~~that~~ which are being violated by the county proposal to eliminate historic equestrian trails that have been used in the Tijuana River Valley.

Finally, I feel that the sewage, trash and other pollutants that are brought into the valley from Mexico every time it rains, are far more harmful to the habitate than horses ever could be. Efforts should be focussed on this problem - how to keep the pollution from Mexico out of the TRV.

Sincerely,
Tonia Corder

P.S. My address and phone # are:

501 S. Rios Ave.
Solana Bch., CA 92075
858-525-2828

Maeve Hanley
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Maeve

I am writing this letter to register my concern over the Proposed Tijuana River Valley Regional Park and Habitat Enhancement Project. As a long-term resident of San Diego, I treasure all of our parks and recreation facilities bought and paid for by the hardworking members of this community.

Although I applaud the Parks and Recreation Department's attempt to enhance some of the parks existing facilities, I am shocked with the attempt by your department to isolate the vast majority of residents from a large part of this unique environment.

The Tijuana River Valley Regional Park is just that, a park not an exclusive preserve accessible only to erudite naturalists sponging off pork-belly grants at the expense of the taxpayer. We the people of this community make mature responsible decisions every day. We build businesses, elect public officials, raise families, serve on juries, and make countless contributions that benefit this community on multiple social-economic levels. We are not as your proposal suggests, deadly viruses that have to be quarantined from public parks because we are too dull witted or callus to respect the habitats of endangered species.

Your plan to restrict historically significant recreational trails for equestrian activities and disrupts environmentally friendly social activities that have existed in the Tijuana River Valley for generations. Your proposal fails to consider the fact that the members of our equestrian community often provide timely information, education, and guidance to park visitor's year around. Services that are not provided as promised by the Parks and Recreation Department and the US Fish and Wildlife organization.

Long Term recreational activities such as hiking, mountain biking, horseback riding, and bird watching are a staple of the riparian environment providing a salutary effect on all those who experience it. What you overlook in your planning process are the positive contributions that recreational advocates such as the equestrian community make to the Tijuana Valley River Park like sponsoring clean up and trail maintenance activities that should be preformed by your department but are more often than not, neglected.

In conclusion, I think your approach is mired in environmental folklore hopelessly out of step with the Best Scientific Practices use in other regions of this country. However, if you are still bent on this course of action, I urge you to include not exclude members of the community in the planning process

Sincerely

Tom Olmstead
2562 Rosecrans Street
San Diego Ca, 92106

2004 NOV 5 PM 1 47

SAN DIEGO CA 921 A
PM
04 NOV
2004

USA

Maeve Hanley
San Diego County Department
Parks & Recreation,
5201 Ruffin Road suite D
San Diego, CA 92123

92123/1633

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

tkacerro@yahoo.com
e-mail address (optional)

Theresa Acerro — **Name**

Sierra Club — **Organization**

8730 Festival Rd. — **Street Address**

619 425-5771 — **Daytime Phone No. (optional)**

C.V. — **City**

CA — **State**

91911 — **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

(1) Need to plan for a connecting trail between OVRP and TRVRP before it is too late.

(2) Existing agricultural lands adjacent and in middle of regional park is there a way to get conservation easements. Some way must be found to permanently stop development/acquire property or get an easement.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Please fold in thirds, staple and affix postage.

3. Some means of ungoing maintenance to include removal of trash from the river.

4. Plan to keep agricultural perticides and fertilizers out of wetland / park areas.

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5. The DEIR must project The impacts of the 1 million more People to be in the Southern part of the County in the next 20 years. These people must be restricted to ~~much~~ many fewer trails or there will be NO habitat left.

AFFIX POSTAGE

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

6. Proposed Multi-use trail is perfectly adequate. Any more will fragment habitat to a much too large degree. Buffers around the trails are necessary. We must minimize the trails.

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7. Horse manure must be removed to avoid excessive nitrogen and exotic seeds. A horse patrol may be a good idea but damage made by hooves must be quickly repaired.

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

tkacerro@yahoo.com
e-mail address (optional)

Theresa Acerro
Name

Sierra Club
Organization

3730 Festival Ct.
Street Address

(619) 425-5771
Daytime Phone No. (optional)

C.V.
City

CA
State

91911
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

1. Make absolutely certain trails do not intrude upon sensitive habitat there must be adequate buffers to avoid frightening or injuring sensitive species
2. Restoration is absolutely necessary! The more the better!
3. If area D is to be developed as active recreation - lights MUST NOT intrude upon sensitive habitat or noise - probably day time use only
4. Trails must be managed and maintained to protect habitat - animal waste must be regularly removed - if horses use the trail damage from their hooves must be quickly repaired to prevent erosion.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

Please fold in thirds, staple and affix postage.

5. It is important that most of if not all the illegal existing roads/trails be restored and the land restored.

6. Cumulative impacts of trails must be assessed including Border Patrol use. - Possibly a limiting of certain uses on a daily or weekly basis? - Determine a number that will bring impacts to below significance.

AFFIX POSTAGE

7. It would be great to have a trail to hike, bike, bird watch from, but #1 priority has to be protecting habitat. The huge number of people who will be using this area in the future must be educated to cause 0 impacts.

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

To: Maeve Hanley, Environmental Resource Manager
San Diego county department of parks and Recreation
5201 Ruffin Road, suite P
FAX 858 495-5841

Thank-you for the opportunity to respond to the NOP for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project.

Biological Resources:

Trails: considering that the MOU only included 10 odd miles of trails and that no recreational trail network is now permitted the 14 plus mile multi-use trail being proposed should be an adequate starting point. I do question whether a 6-foot trail will be useable at the same time by hikers, bikers and equestrians. A possible future solution may be limiting certain users to certain times and/or days. In any case once the system is in place careful monitoring will need to be done and recording of users' comments for study. Will there be some kind of a citizens group to monitor the park and recommend changes? Who will develop the management plan? The park is now underutilized but once the staging area and trails are in place this could change rapidly given the expected million residents for south county.

As much habitat as possible needs to be restored and then protected from encroachment by people and their animals. Where feasible wildlife observation sites (shielded from the view of wildlife) ought to be constructed. The priority has to be given to habitat restoration and conservation. There is precious little left. The Otay Mesa area used to be full of vernal pools providing habitat for wetlands species and migratory birds. Housing developments have destroyed most of the area. Even the area to the north of this park has become a housing development destroying vital wetlands habitat. This is no longer the Wild West. All the homes being built on Otay Mesa and in San Ysidro are going to have thousands and thousands of recreation hungry children and adults who will use this park in the near future. It is regrettable that the horse people did not put their considerable energy in to trying to stop this development, but now they are going to have to learn to live with it like the rest of us. It would be extremely sad to see them leave, but they are going to need to adjust to a new reality.

Any active recreation and the two-acre staging area must control lighting and noise and direct it away from the park. It also must be fully mitigated for.

Plans must be included to provide a linkage from the TRVRP to the OVRP. The Dairy Mart Ponds need to be included in restoration plans and could be part of this linkage.

A possible alternative to removing all 71 miles of trails might be to recruit equestrians who agree to be volunteer monitors and agree to promptly clean up after their animals and repair damage done by their horses' hooves in exchange for the privilege of access to additional trails.

Clearly many of the redundant and habitat damaging trails must be removed so that the habitat can be restored. Only trails that are fully mitigated and not harmful to the native plants and animals living in and visiting the area should be allowed.

There must be an enforced rule that dogs are leashed in order to protect wildlife, and of course all animal owners should be encouraged to clean up after their animals. Perhaps, a weekly or monthly clean-up day including animal waste could be implemented. Although the convicts could be asked to do this it would be preferable for owners to take this responsibility.

Rural character: It is urgent that the County at least buy up development rights to or secure conservation easements on the remaining agricultural land in the valley. There must be no more housing developments!

Water Quality and Public Health and Safety: There needs to be ongoing monitoring of existing uses around and in the park to ensure that manure, fertilizers and pesticides do not contaminate the park and the wetlands. Patrolling the area regularly may be a way of preventing the build up of trash in and near the water. This is not only an aesthetic problem but also an environmental one.

Some kind of agreement must be reached with the Border Patrol to keep their forces out of sensitive areas.

A contingency plan for dealing with the overwhelming environmental destruction that would be caused by the completion of the triple border fence infrastructure system needs to be included in the DEIR.

ALL TRAILS, STAGING AREAS ETC. MUST BE FULLY MITIGATED FOR IN THE DEIR, ESPECIALLY SINCE NO TRAILS WERE ALLOWED BEFORE UNDER CEQUA.

Sincerely,
Theresa Acerro
P.O. Box 8697, Chula Vista, CA 91912

(Mark Jensen)
616 Oaklawn Ave #3
Chula Vista, CA 91910

176 ELKWOOD AVE
INP. BCH 91932

375 Jason Place
Chula Vista CA 91910

3233 Tequila Way
San Ysidro, CA
92173

3770 Keating St. SD CA 92110

SAN DIEGO CA 921 H
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2004

2004 NOV 4 PM 2 02

Maeve Hanley
S.D. County Dept. of Parks + Rec.
5201 Ruffin Rd, suite P
San Diego, CA

92123/4310

11/1/04

2004 NOV 4 PM 3 03

Maeve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Mr. Hanley,

I rebel gravely against the City Of San Diego Department of Parks & Recreation and other agencies who collaborate against the private land owners and the rights of all horseman to ride the trails in the Tijuana River Valley. THE PROJECT PLAN THAT WOULD ELIMINATE ALL EQUESTRIAN TRAILS, as we know them, including Sherwood Forest, Cathedral Trail, Brian's Bridle Trail and Wycliff Trail, is not a profitable solution for anyone. People trailer their horses for miles to ride the trails and enjoy the beauty, not to ride a kiddy trail.

The proposal to have a wide trail made to be shared with horses, bikers, hikers and walkers is not an intelligent consideration. How many people need to be hurt before this is realized. Maybe we can put a horse lane on Interstate 5, *just as ridiculous.*

Horses have been is the valley since 1769. *I guess it's not working?*

If the grant was used to enhance the trails instead of illuminating them, nature and horses would work together. It's man that messes up nature.

We need trail rental horses more than ever. Where can a City family take their children to ride a horse on our beautiful shoreline that San Diego is famous for. It's an outrage that this wonderful slice of freedom is threatened to be taken away from the people of San Diego and the people who travel here to experience it.

If you stopped anyone on the street and asked them about TRV they would never say. "Oh, yea! That's where the endangered birds live." Everyone associates the valley with horses. *If horses could fly I would see a problem.*

SAVE THE TRAILS AND LET MAN, HORSES AND BIRDS BE FRIENDS THE WAY NATURE INTENDED IT TO BE!

Fighting for a solution,

Carol Kimzey
The Kimzey Ranch
2204 Monument Rd.
San Diego, CA 92154

Sharon J. Moore
Kimzey Ranch
2204 Monument Rd
San Diego, Ca. 92154

October 29, 2004

San Diego Dept of Parks and Rec.
201 Ruffin Road, Suite P
San Diego, CA 92123

Attn: Maeve Hanley,

Subject: Equestrian Trails in Tijuana River Valley

Dear Ms. Hanley

We have lived in the TRV for almost 30 years. We have been through Illegal Aliens over running our property, as well as 2 or 3 major floods. Through all of this the reality has been several well meaning environmental agencies trying to save the valley for the **"PEOPLE".** So why does the valley flood into the **"PEOPLE' S"** homes and businesses causing damage and destruction. Because of a few supposed Endangered species of birds that supposedly nest in the river willows. If the willow trees were cleared to the ocean we wouldn't flood. Does this sound like the special interest really care about the **"PEOPLE"?** During the '93 flood there were several signs that expressed the feelings of the **"PEOPLE".** My favorite was the one that said, **"WELCOME TO THE TIJUANA RIVER VALLEY WHERE BIRDS FLY AND PEOPLE DIE".** As we were the ones who saw body bags being air lifted out of the river. Of course this is for the **"PEOPLE".** The valley has become a wonderful sanctuary for the **"PEOPLE"** to trailer their horses into the valley and enjoy a beautiful ride to the beach. Now mind you the trails have been here for over 100 years. The horses have never ruined one thing in this valley. But since the special environmental interests have had their way here, people have died, businesses have been destroyed, people's homes have been flooded and now the special interest groups are trying to take away one more thing that the **"PEOPLE"** enjoy doing with their animals. All under the auspices of wanting open space for the **"PEOPLE".** Its not for the people its for the selfish and self indulged **SPECIAL INTEREST ENVIRONMENTALISTS.**

In order to do the right thing the existing trails through out this valley should be left as is. The people who use these trails should decide which ones to eliminate, if any. That will happen naturally because if a trail does not get ridden it will overgrow and disappear. That's the way true nature works.

Sincerely

Terry & Rocky Lindsey
Residents and Land Owners

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT Comment Form

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PLEASE PRINT

e-mail address (optional)

Name MR + Mrs. Terry Lindsey **Organization**

2425 Monument Rd. (619) 428-1973

Street Address (optional) **Daytime Phone No.**

San Diego CA. 92154

City **State** **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project - State Clearinghouse #2004091159

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

Mr + Mrs. Terry Lindsey
2425 Monument Rd.
San Diego, Ca. 92154

SAN DIEGO CA 921
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Ms. Maeve Manley
San Diego Dept. of Parks + Recreation
5201 Ruffin Rd., Suite P
San Diego, Ca. 92123

92123+1653

SWIA
P.O. Box 575
Imperial Beach, CA 91933

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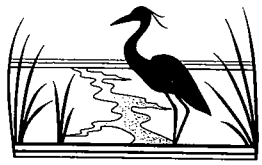
Ms. Maeve Hanley
San Diego Dept. of Parks & Recreation
5201 Ruffin Rd, Suite P
San Diego, CA 92123

92123+4310



October 24, 2004

TO: Ms. Maeve Hanley, San Diego County Parks and Recreation Department

FROM: Mike McCoy, Southwest Wetlands Interpretive Association (SWIA)

RE: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

The Southwest Wetlands Interpretive Association (SWIA) has worked with other agencies, elected officials and the public to protect, restore, rehabilitate and educate people about the importance of maintaining the integrity of wetland ecosystems and the watersheds that support them. SWIA has worked to protect the Border Highlands, Tijuana River Valley and the Tijuana Estuary since it was founded in 1979. The integral relationship between the Valley, the Highlands and the Estuary must be recognized as an ecological complex which functions as an interdependent unit. Alteration in one part affects the functional capability throughout.

This complex hosts a diverse plant and animal community, both invertebrate and vertebrate, including fish, amphibians, reptiles, birds and mammals. Nearly 400 species of birds including migratory shore and wading birds, migratory waterfowl, neotropical migrants, and resident species, several which are endangered or threatened, depend on this area for survival.

This complex is an oasis between two massive rapidly growing urban areas, Tijuana and San Diego. Because of its proximity to this regional megalopolis it serves as a respite for humanity in addition to serving as critical habitat for numerous species of plants and animals. Because San Diego County has more endangered species than any county in the United States it becomes even more important as a refuge for protection of biodiversity.

Because of the tremendous human pressure and impact it makes it even more imperative to manage the Tijuana River Valley with ecological consideration as the number one priority. All human activities must be evaluated with this in mind.

Everybody wants a balanced approach to management, but due to habitat loss in this county and along the Southern California Coast, it becomes even more imperative to balance in an ecological context, a sustainable context which emphasizes passive rather

Southwest Wetlands Interpretive Association ▪ P.O. Box 575 ▪ Imperial Beach, CA 91933
tel. (619) 575-0550 ▪ fax (619) 424-6420 ▪ www.swia4earth.org

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than active use. Management must be aimed at habitat integration and protection of wildlife corridors, hence the prevention of fragmentation and genetic isolation.

The plan must balance use for hikers, bird watching, solitude and equestrian use. Old renegade trails in critical habitat areas must be closed and restored. An educational component added to the valley experience would help to make ecological management easier.

We want to see more emphasis put on habitat restoration and working to meet the mandates set forward by the US Fish and Wildlife Service, which have been presented to the County.

We feel public recreation is very important and that the design of the 12 to 14 miles of trail should be more than sufficient if implemented properly. Our major concern is to maintain the integrity of the ecological system and to restore, and enhance habitat as a number one priority. Within this context we want to afford the visitor a special opportunity to experience a natural setting that allows them to come home with more respect and understanding for the complexity of the system that keeps us all alive.

Additional comments from meeting 10/25/04:

1) We emphasize the importance of solitude. We all need places to escape daily pressures The Tijuana Valley Park is a place for us to do just that. Education is key to this experience. Children rarely experience silence or the opportunity to observe nature and to understand natural systems. They are barraged by television, computers, video games, replacement of life with virtual reality, an obsession with speed and mechanization etc.

2) Bicycles may not work well with horses, hikers and bird watchers. It would be better to keep bicyclists on existing roads such as Hollister, Monument, Sunset, Dairy Mart and a few appropriate roads in the valley. Existing roads must be improved for bicycle safety and if done properly will afford a wonderful experience. The San Diego bayshore bicycle path will allow easy access to the Tijuana Valley Park via Saturn Blvd. This route ultimately leads to the County Bird and Butterfly Garden and the old County Ranger Station. Cyclists can access Hollister go to Monument Road then on to Border Field State Park. There are side trips which will challenge a cyclist by using existing roads to the top of the Border Highlands. A ride like this can include everything from the Coronado Ferry and Gas Lamp District to the Sweetwater River Park, and on to Border Field State Park. Many of us have done this ride in part or in total and enthusiastically support the experience. The real downside in this experience concerns safety issues. Existing road improvement and ingenious traffic calming techniques can be used to enhance a great ride. Speed limits for motor vehicles are important and have to be observed by those who choose to experience the valley and park in this way.

3) I certainly understand the love that equestrians have for the valley and the love they have for the solitude that goes with it. It may be best to consider a more natural shared pathway for hikers, birders and equestrians. The "freeway feel" needs to be replaced by

the "country road feel" as long as the trails can be maintained and are not built in areas that become bogs and muck holes during the rainy season. Trails have a tendency to expand from 4 feet to 12 feet in width as one group tries to avoid the mud hole created by the previous group. The width of the trail, the trail surface and the ambiance of the surrounding environment certainly contribute to the total outdoor experience.

4) Horse manure is a problem. It increases invasives, raises water quality issues and decreases a quality experience for hikers and birdwatchers. SWIA has a team of scientists working hard to control both non native plants and cow birds in the valley. We have great concerns about this issue. Other agencies like the National Park Service have decreased the problem of fouled water and the spread of invasive plants which take thousands of dollars to control. We suggest looking into other agency solutions in addressing this problem.

5) We need to look at carrying capacity for horses. The county and city both have designated the number of animal units per acre permitted in specific areas depending on zoning regulations.

6) If horse ranches rent out their stock and use public lands to profit then they are concessionaires. We should explore a set fee for the use of this public property like any national park etc. would do. This fee would help defray costs for management, repairs to trails and cleanup. Government must try to obtain full cost recovery in this tight financial climate.

7) Agricultural practices fall into commercial and community garden allotments. If agricultural practices of any type are found to be appropriate then they should be required to use integrated pest management and organic growing techniques. The sensitivity of the habitat has to be considered. We cannot allow the use of any pesticides and should limit the use of non organic nitrogen fertilizers. This is a place where horse manure could be composted properly and returned to the soil for crop production. Community gardens are excellent and should be encouraged. This is a good way to get families to work together and a place where children can learn about the concept of "if you treat the land well it will treat you well." This is a true educational experience exposing people to social interaction coupled with an ecological understanding about food production and health.

8) Floodplain management is a controversial issue that must be addressed. Unauthorized berms should be removed. The Brown fill was put in during the 1980 floods and needs to be evaluated for removal. We would like to see the Tijuana River go back to a free flowing river system to the greatest extent possible.

9) Sediment control is a serious issue. Control of sediment using re-vegetation, sediment control basins etc. need to be evaluated as an ongoing part of habitat restoration.

10) We need to tie the Tijuana trail system with those of Imperial Beach and the Otay Valley Regional Park. We are working on both these trail systems.

11) Ecotourism is becoming an important part of our regional economy. Imperial Beach received an ecotourism grant from the California Coastal Conservancy. The county received the Tijuana Valley Trails and Habitat Restoration grant at about the same time. Both grants compliment each other and will help foster regional ecotourism.

12) Strong interagency management is necessary to protect and restore the Border Highlands, the Tijuana Valley and the Tijuana Estuary. This must be looked at as an interdependent unit.

13) Work with the Border Patrol to protect the integrity of the Tijuana Valley.

We are aware of the many concerns voiced Monday night. We still need to be vigilant about habitat restoration and protection as mentioned in our initial letter. Environmental laws have to be upheld and people need to understand how special this valley is. This planning effort is our last best chance to do it right. We will provide a park people can come to love and use with respect. Humans are only one of many species inhabiting this planet and people need to understand what that means. We should play a positive role in protecting and maintaining the ecosystem we live in. We need to encourage sustainability and provide an educational and recreational experience to go with it. We want people to leave the valley with a positive experience and a desire to return.

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

SusanFuller933@AOL.com.
e-mail address (optional)

Susan Fuller
Name

Friends of S.D. Wildlife Refuges
Organization

1140 Seacoast Dr.
Street Address

Daytime Phone No. (optional)

Imperial Beach
City

CA
State

91932
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

* Visitor trails + facilities must be well thought out + managed to not deplete the habitat value, the wildlife, and the water quality that are a major part of the attraction.

* Identify a system for continuously evaluating the carrying capacity for a mix of uses, and incorporate plans to make closures, limits of uses, and adjustments to trails when carrying capacities are exceeded.

* Incorporate more of the original "NOW horse trails" into the plan - agreed with TRVEA that these "horse people" are important as the "eyes + ears" of valley protection.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

original - LUEG
copy - Walt

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04 NOV -4 AM 8:00

GREG COX
SUPERVISOR, FIRST DISTRICT
San Diego County Board of Supervisors

DATE: November 4, 2004
TO: Walter Ekard, Chief Administrative Officer
FROM: Supervisor Greg Cox
RE: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

---

The County is currently working to prepare the Environmental Impact Report for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project. The overarching goal of developing a comprehensive plan to improve trails and habitat should be to maintain the greatest amount of public access for recreational uses and enjoyment while protecting unique and sensitive environmental resources in this regional park that is a key component of the County's regional park system. Therefore, I respectfully request that you consider the following issues as the County moves forward in this process:

- Seventy-one miles of dirt pathways and roads currently exist in the Tijuana River Valley Regional Park, however the project proposes only 14.7 miles of trails. More trails must be evaluated than are currently delineated in the Proposed Project map.

- In addition to the 14.7 miles of proposed multi-use trails, an evaluation of equestrian-only trails or equestrian/pedestrian trails should be included. Generally, the multi-use trails should be located around the perimeter of the Tijuana River Valley Regional Park. The equestrian-only trails or equestrian/pedestrian trails can be located in the interior of the Park to allow access to the River and to allow birders the access to view species without interference from other users.

- The addition of trails on the mesas south of Monument Road with additional linkages between the mesas through Smuggler's Gulch and between the mesas and the east and west ends of the Park must be evaluated.

- Since the Tijuana River Valley Regional Park is an isolated environment surrounded completely by urbanized communities and the Pacific Ocean, the linkages to trails outside the Tijuana River Valley Regional Park boundaries must be included.

Thank you for your time and attention to this issue.

Sincerely,

Greg Cox

GREG COX
Supervisor, First District

County Administration Center • 1600 Pacific Highway, Room 335 • San Diego, CA 92101
(619) 531-5511 • Fax (619) 235-0644 www.gregcox.com
Email: greg.cox@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

STEVEN GIBSONCB@juno.com
e-mail address (optional)

STEVEN GIBSON
Name

Organization

P.O. BOX 126295
Street Address

619-384-5947
Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92112
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

SEE ATTACHED ADDENDUM

4 NOV 2004 AM 10:27

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

November 3, 2004

To: Maeve Hanley
San Diego County Department of Parks & Recreation

From: Steven Gibson

Re: Addendum to:

Tijuana River Valley Regional Park Trails and Habitat Enhancement Project Comment Form.

Maeve,

My family and I moved from Montana to San Diego in 1998. About four years ago we brought our horses down from Montana and have been boarding them in the TJ River Valley since then. We sometimes trailer them to Cuyamaca State Park, Hollenbeck Canyon near Jamul and the Sierra Mountains to ride and pack-in. We have a long history of owning horses and I have served as the Secretary for the Yellowstone Chapter of the Back Country Horsemen of America and with the Pryor Mountain Wild Horse Association. My family has many fond memories of packing into the backcountry near Yellowstone National Park and into Glacier National Park as well as the Beartooth Wilderness Area in Montana and the Golden Trout Wilderness Area in the Sierra Nevada Mountains, among others.

In this short writing, it is difficult to express in words the extent to which we have enjoyed riding in the TJ River Valley. From the beginning, I have been truly amazed at this natural sanctuary between two countries, two major international cities, and two very different worlds. It is fitting that one of the favorite trails of locals, has been fondly nicknamed the "Cathedral Trail." It seems to me that the TJRV is a world of its own, set apart. It truly should be protected and preserved. During our entire time spent in the Valley, we have observed very few problems. Wildlife such as coyotes and birds seem to co-exist peacefully with horses and people.

Aside from its natural beauty, the Valley has been a sanctuary in another sense. The area has provided immeasurable enjoyment and recreation for a wide array of citizens with varying interests. I have personally seen the joy on the faces of men, women and children, many who have never ridden before, as they discovered the joy of horseback riding and interacting with animals. If you would like copies, I have many pictures we have taken over time of our guests and friends during their visits to ride horses. We have pictures of sunset rides on the beach, little children riding for the first time, and flowers in the tidelands. The rental stable is truly missed by many and I believe was an asset to our community, which is well known for its wide variety of recreational offerings, one of which is now void. Most people love to ride to the beach. There is something attractive and romantic in the minds

of most people about riding horseback on the beach. What a rare opportunity this is for people to enjoy. For me personally, it is one of my favorite things. There is nothing quite like the sense of Ocean, Sky, Wind and Wave and the movement of a horse underneath you, to make your senses come alive. For others, the Valley has provided this same sense of satisfaction in other ways, from Gardening at the Community Garden, to playing baseball at the new field, to farming and bird watching. The Tijuana River Valley has provided a sense of well-being for many and has been an island of refuge in an ocean of storms and day-to-day stresses of life. Often we have had many relaxing conversations and meals after a day of riding. Some have even had their wedding ceremonies in the Valley.

It is obvious to me the TJRV is plagued by activities not associated with equestrians, gardeners, farmers and so forth, but rather by illegal dumping of trash, garbage and sewage flowing out of Mexico, and trash washing up on the beach. It has been heart breaking for me to witness these things. The Valley could be so much more beautiful if these issues can be resolved. Late one evening, one of our horses alerted me to what I presumed to be illegal aliens passing through the ranch. I have observed their fresh cut trails crossing trails normally used by equestrians, where clothing and other articles are often left behind.

I believe the County is doing a good job of improving much of the Valley. The staging area, new baseball field and community garden are fine examples of what can and ought to be done with the valley. I believe it would be a mistake to create a large, wide trail through such a natural, lush preserve. The TJRV is different from many other open space preserves in San Diego County. It would be better to have trails more in keeping with the environment, like trails found in state and national parks and wilderness areas. In those places, people still like to hike, observe and enjoy the natural surroundings. Also, I do not know of anyone that would be displeased with such trails. The Tijuana River Valley Equestrian Association did a fine job of preparing a proposed trail map. The members of this organization have extensive knowledge of the valley and I believe this map should be adopted. The dirt roads in the valley should be eliminated. These roads allow illegal access by certain elements of the public to dump trash and certainly do not enhance the natural habitat.

The TJRV is a valuable natural asset for San Diego. Under the watchful care of the county, and with well thought out planning, the Valley can become our crown jewell.

Sincerely,

Steven Gibson

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

bodi2@cox.net
e-mail address (optional)

Name: Steve Cohan

Organization

Street Address: 1143 Oneonta Avenue

619.338.4671
Daytime Phone No. (optional)

City: Imperial Beach

State: CA

Zip Code: 91932

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

One current use that severely impacts the subject habitat on the issues of noise, hazardous materials, air quality and aesthetics is navy helicopter operations centered on Ream Field. Over the decades the equipment used has changed from the utility craft of the early 1950's to modern jet powered military combat platforms. High decibel noise moving with the aircraft along and over the habitat 12 and more hours, day and night, impacts all wildlife, particularly birds which include several endangered species. Engine exhaust adds to the area pollution. It is unclear to what extent jet fuel is a direct contaminant of the area. The aesthetics of weekday use of the park is obviously severely impacted by the air traffic.

While navel operations may be beyond the scope of County of San Diego Department control, a full and fair discussion of environmental impacts on the habitat requires that the helicopter traffic issue be addressed.

FAX Cover sheet

To

Maeve Hanley, San Diego County Department of Parks and Recreation, 5201 Ruffin Road, Suite P, San Diego, California 92123, 858) 495-5841 fax.

2 pages to follow

From
Ed Kimura
Sierra Club
San Diego Chapter
858-560-2025

SIERRA CLUB
FOUNDED 1892

Sierra Club, San Diego Chapter
3820 Ray Street
San Diego, CA 92104

Chapter Chair:
Richard Miller 619-291-3061
Administrative Assistant:
Martha Bertles 619-299-1743
mcoffman@sierraclubsandiego.org
Administrative & Volunteer Coordinator:
Cheryl Reiff 619-299-1741
creiff@sierraclubsandiego.org
www.sierraclubsandiego.org

November 2, 2004

Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

Subject: Comments on Notice of Preparation for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project EIR

Dear Ms. Hanley:

The Sierra Club supports the Tijuana River Valley Regional Parks Trails and Habitat Enhancement Project. The Tijuana River Valley is a vital natural resource that must be protected with the proper enhancement and management for generations to come.

The EIR should describe the planning and implementation of the Regional Park that addresses the need to protect the unique and sensitive habitats in this region. It also should recognize that the Tijuana River Estuary is listed as being impaired for bacteria, eutrophic conditions, low dissolved oxygen, plus heavy metals and pesticides. The project enhancements should be coordinated with the Total Maximum Daily Load (TMDL) programs that will be implemented to address these impairments.

The trail plan should be designed to meet the recreational needs but not at the sacrifice of the disturbing sensitive habitats and wildlife. The EIR must implement mitigation measures that will provide the necessary protection of these natural resources.

The trail network must be designed to prevent erosion and runoff into the Tijuana River. During wet weather, biking and equestrian traffic on the trails can cause extensive erosion. Consequently, trail management must limit, even prevent, such traffic during these periods. Trail management should include monitoring and maintenance to prevent excessive use and periodically close off trails showing abnormal wear to allow for restorative measures. Existing trails not in the plan should be closed off and the lands restored.

The EIR should address methods to clean up the horse manure from the equestrian users, as this is one source of bacterial contamination and excess nutrient loading of the Tijuana River and the Estuary. The manure if not removed from the trail network will add undesired nutrients that can alter the natural vegetation. It is presumed that the storm water permit will require best management practices for the runoff from the horse stables in the region, but the EIR must provide assurances that these BMP's are implemented in the trails management plan.

Because the plan proposes multiple uses of the Park trails, it must be designed and managed to minimize conflicts among the different uses. While trail etiquette signs are commendable, the EIR must address enforcement methods and public education that will protect the health and safety of the Park visitors of all ages.

Tijuana River Valley Regional Park Trails and Habitat Enhancement Project EIR should include adaptive management for the long-term preservation of its natural resources. The habitat enhancement program should include a long term monitoring program to assess the success and shortcomings of the program and make corrections as required. Trail network should be assessed to determine if it is causing negative impacts to wildlife, habitat, and water quality and mitigation measures implemented.

Sincerely,

Ed Kimura
Chair, Water Subcommittee

Nov 3, 04

Comments submitted by:
Wayne Yarroll
1777 Thelborn Way
San Diego Ca 92154
Email: taynway@aol.com

General Comments on Proposed Exhibit Project (Sheet A) Exhibit 3 Draft 9-23-04

First of all I would like to thank all of the presenters and respective agencies for the excellent presentation. Very professional. I for one was very happy to see the community interaction without digressing to shouting matches. It is perceived that the community has adopted the idea that what was presented is "proposed" and requires the input of all to achieve a workable and equitable solution for all.

The proposed bridge and staging area, Dairy Mart Road are both excellent ideas.

I do feel that there are not enough trails, equestrian, biking and hiking. In the design and routing of any trails, consideration should be given to maintain linkages to existing State Park and TNNER trails. If trail realignment is being considered in these areas, it should be known now so that continuity of the system can be maintained.

The following comments address specific areas annotated on the attached.

1. Areas 1 and 2 become flooded after major, even minor, rain events. Consideration should be given to possible elevation of trail in these areas. Especially in area 2 of the proposed bridge.

2. With the eventual berm removal, area 3, will improve flow under Hollister Street bridge, but also contribute to flooding in area 2.

3. Trails in area 3, often referred to as Sherwood Forrest, should be retained as equestrian and hiking trail.

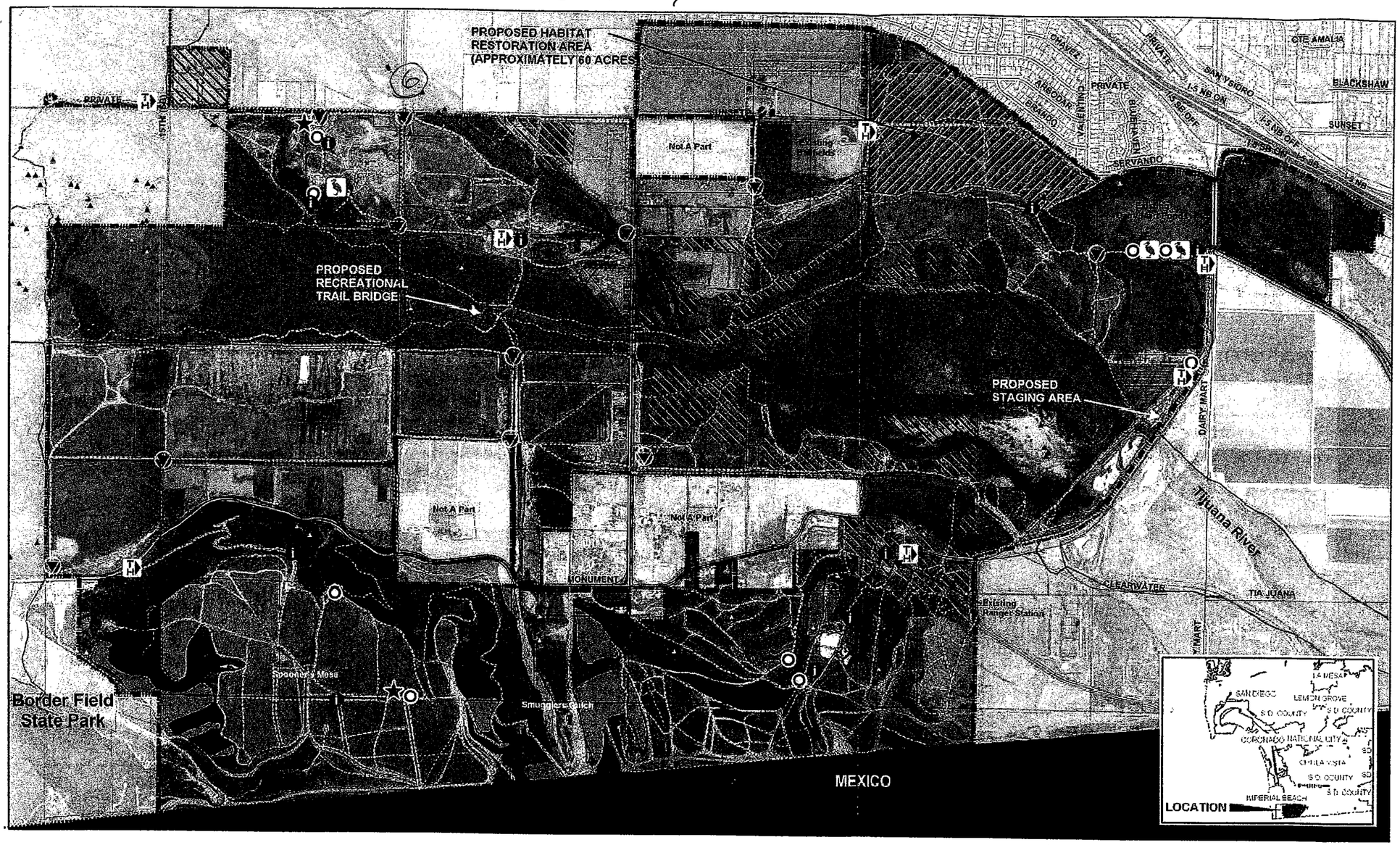
4. Trails shown in area 5 are geographically displaced. These exist on the north side of the river.

5. Area 6 is outside of County Regional Park, but has a direct affect on trail access, and proposed Bird Observation Blind. This area becomes flooded upon major rain events. Recent water flow has rendered passing through this area to precarious at best due to roadbed degradation.

Thank you for your consideration

Wayne Yarroll

INPUT BY: WAYNE YARRELL 10/20/04



Proposed Project to Permit

- 6' Wide Multi-Use Trail (14.7 Miles)
- Memo of Understanding (MOU) Trail 1997 (To be superseded by the Proposed Project) - (10.3 Miles)
- Proposed Habitat Restoration (60 acres)
- Future Habitat Restoration areas, (Approximately 89 acres)
- Trail Head (Sign with park map, hitching post, bike rack and bench)
- Interpretive Signage
- Hitching post and bike rack
- Bench
- Bird Observation Blind
- Directional Signage

NOTES:
Trail Marker Locations to be determined
See plan for Proposed Recreational Bridge
See plan for Proposed Staging Area

Existing Conditions

- Tijuana River Valley Regional Park
- Existing Dirt Roads and Pathways (71.0 Miles)*
- Tijuana River National Estuarine Research Reserve (TRNERR)

Riparian Plant Communities**
- Southern Willow Scrub
- Restored Southern Willow Scrub
- Southern Cottonwood-Willow Riparian
- Mule Fat Scrub
- Fresh Water Marsh
- Open Water

Rare Plant Locations**
- Chaenactis glabriuscula var. orcuttiana
- Corepsis maritima
- Euphorbia misera
- Ferocactus viridescens
- Ornithostaphylos oppositifolia
- Quercus dumosa
- Selaginella cinerascens
- Viguiera lacinata

Spring Survey**
- Least Bell's Vireo
- Other Sensitive Bird Species

* Data Source: Dan Hays Trails Inc., 2004
** Data Source: EcoSystems Restoration Associates, 2004

County of San Diego

NORTH 0 600 1,200 2,400 3,600 Feet

Tijuana River Valley Regional Park

Trails and Habitat Enhancement Project

PARKS AND RECREATION COUNTY OF SAN DIEGO

VAN DYKE LLP

Greystone Environmental Consultants, Inc.
SWCA Environmental Consultants
WRC Consulting Services
G-Force

SanGIS

Proposed Project (Sheet A)
Exhibit 3
Draft 9-23-04

RAY FORNARIO

177 Ebony Avenue, Unit B
Imperial Beach, Ca
91932
Rayfornario@cs.com

October 27, 2004

Dear Maeve Hanley,

I am an equestrian in the Tijuana River Valley and have been riding and boarding my horses there for 17 years.

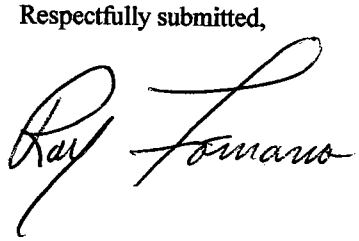
I have seen many changes come over the valley in that time, most not for the better. I have volunteered with California Parks to patrol the park. It is interesting to note that most problems that I encountered on those patrols came from people who were not equestrians. Instead they were people dumping trash, shooting paintballs, shooting at birds, riding ATV's and dirt bikes and letting dogs run loose on the beach upsetting the birds. Our volunteers picked up trash in the valley. They keep trails clear of debris. The equestrians are as concerned about the environment as any of the other groups involved in this park are. We have lost much of our trails these last few years and will fight to keep what is left. We have always fought to save this valley from those who would try to abuse it.
Horses and bicycle's as a rule do not mix. Horses are terrified of bicycles. Bicycles are silent and when they come upon a horse, especially from the rear, the horse will bolt or spin around. It is dangerous to say the least. Our peace and quiet that we now enjoy on the trail will become a thing of the past.
Horses do not frighten the birds at all. Anyone who is knowledgeable about wildlife can attest to this.
I have noticed that since they have now reopened the park to the public, the amount of trash and beer bottles growing...especially by Monument Park. I found someone riding a ATV 2 weeks ago on the beach. I have even started to find graffiti on signs in the park. This is an improvement? It would appear to me that these are the people that the current plan caters to.

The County of San Diego has become very anti-horse. They have forced the only horse rental stable out of business by not giving him a permit. Your park plan shows the general disregard you have held us in when doing your initial design. You have said that there are many "redundant trails in the park that need to be eliminated". There is no such thing as a redundant trail. They exist for a reason. They are a way that people can take different routes through the park. They relieve congestion on any one trail, plus each has it's on unique charm. They harm no one, and do not harm the environment. Would you consider Route 5 and Route 805 and even Route 15 redundant? All 3 go in the same directions, don't they? Of course you wouldn't! They serve a purpose as do our trails.

I propose a bike trail that runs alongside of current roads, just like they have on Route 75. Leave the majority of horse trails untouched. We need our bridge over the Tijuana River. Right now, equestrians are forced out onto Hollister Road they want to ride to the beach. This is very unsafe and accidents have occurred between cars and horses. The road is to narrow and people drive to fast. There has been money allocated for a bridge and bridal path before and it has gone somewhere else.

We all want to work together but this draft is unacceptable. We have voiced these same objections before...who is listening to us?

Respectfully submitted,



2001 OCT 29 PM 1 29

Maeve Hanley
San County Department of Parks
5201 Ruffin Road
Suite P
San Diego, CA
92123

92123+4310

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

	e-mail address (optional)
WAYNE HARMAN	SAN DIEGO AUDUBON
Name	**Organization**
1212 ARCHER ST.	
Street Address	**Daytime Phone No. (optional)**
SAN DIEGO	CA 92109
City	**State** **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

It would be helpful if the birding areas could be on spurs off of the main trails, so horses are not in the birding areas. This area is part of the San Diego Christmas Bird Count & every year we find migrant birds in the area as well as rare & endangered ones.

At the present time equestrian groups ride wherever they want. How do you plan to police the riders to make sure they stay on the prescribed trails?

Try to keep trails out of areas prone to flooding.

Try to keep trails away from Least Bell's Vireos.

I'm glad to see that the Dairy Mart Ponds are part of the park system & will be enhanced as a birding area.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

SAN DIEGO AUDUBON SOCIETY
4891 Pacific Highway, Suite 112
San Diego, CA 92110

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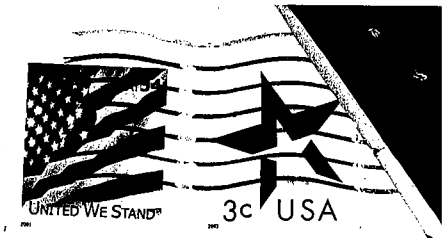

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Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

92123+4310

SAN DIEGO AUDUBON SOCIETY
4891 Pacific Highway, Suite 112 • San Diego CA 92110 • 619/682-7200

November 1, 2004

Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

Subject: EIR scoping comments for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

Dear Ms. Hanley

The Tijuana River Valley is the most important coastal wildlife resource of our region. The connection between the River Valley and the estuary and on to the Ocean is not truncated with freeways, railroads, or large facilities as are all of the other river valley/estuaries in our region. The banks are not edged with high intensity development. The area is still subject to seasonal flooding and, to some extent, natural river dynamics. The combination of the river valley and estuary contain a large number of threatened and endangered species. They are a core biological area of the region's Multiple Species Habitat Plan, indicating their importance for the region's plan to protect a list of specific threatened and endangered plant and animal species. It is very important that the natural resource value of the river valley and estuary be protected for all time.

Because of its natural resources and its tranquility, the area also has huge potential for natural resource based recreation. It is extremely important that the recreational uses do not degrade the natural resource value. It is also important that the recreational facilities provide a broad range of environmentally benign recreational opportunities for users throughout the region.

We strongly support this project as it will provide an opportunity to provide recreation facilities for a broad range of users in context with important habitat enhancement efforts. As such the project should provide both an environmental and a recreational benefit. However the project can only achieve that goal if the design of the project is done very well and if the Environmental Impact Report does a thorough job of identifying the full environmental impacts of the project including the cumulative impacts of this and other human recreational and other activity in the region. The EIR must also identify a range of alternatives that will eliminate any potential impacts.

We strongly urge that the project and the EIR work to achieve a genuine synergy in which the recreational improvements reduce the negative environmental impacts of current use while providing a higher quality of recreation for a larger range of future users, and in which the habitat improvements provide for greater wildlife presence which will make the area a more rewarding and interesting experience for nature based park visitors. This synergy should be a project goal, but the analysis to make it possible will depend on a thorough CEQA analysis and identification of project alternatives that will benefit both the recreational and restoration goals.

We urge that the CEQA analysis thoroughly assess the potential impacts of the project and provide a thoughtful and creative set of alternatives to make this project provide the maximum recreational and environmental value. We refer the reader to the Scoping Letter by the Environmental Health Coalition for a more detailed discussion. However we will list a few issues that will be important for the EIR to consider.

- Substantially reducing the number of miles of redundant dirt roads and trails.
- Identify trail types that are more conducive to affordable, better, and more sustainable maintenance.
- Providing better facilities for road bikes, mountain bikes, hiking, birding, photography, etc.
- Evaluating the water quality and habitat impacts of the trails in frequently wet sensitive riparian areas.
- Evaluate the human health impact of trails in frequently wet riparian areas.
- Reducing the attraction of cowbirds to potential vireo habitat by managing manure.
- Assess various combinations of multiple users on trails in terms of recreational value, user safety, environmental impact, and maintainability.
- Assess the potential value of setting a policy for seasonal closure of some trails to accommodate wildlife and water quality needs and rotational closure of other trails to allow trails and areas to recover or be maintained. The goal would be to reduce environmental impact while maintaining a broader range of user experiences.
- Assess the impact of various types and uses of trails on the introduction or expansion of invasive species into habitat area. Identify measures to reduce this impact.
- Assess what buffers are needed between various types of trails and wetland habitat, specific nesting species, and foraging species.
- Assess the impact of fragmentation by various types of trails and unimproved roads on various native species. Identify ways of reducing those impacts if important.
- Evaluate the cumulative impacts of the planned recreation activities in conjunction with other other human activity such as Border Patrol operations, Triple Fence construction, operation, and maintenance, border lighting, channel maintenance, civic infrastructure, etc.
- Assess the potential impact of the planned and current trails on the wildlife and water quality of areas protected by California State Parks and the U.S. Fish and Wildlife Services.
- Assess the sustainable carrying capacity of the Park for various combinations of users and recommend ways of keeping use within that capacity.
- Identify ways of performing on-going assessments of sustainable carrying capacity and on-going management plans to actively keep use within that capacity.

We look forward to the progress of this project and would like to remain a part of the future planning, design, analysis and implementation. Please keep us informed of future events. In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or peugh@cox.net.

Respectfully,

James A. Peugh

James A. Peugh
Coastal and Wetlands Conservation Chair

November 1, 2004

San Diego Dept. of Parks & Rec.
Ruffin Rd, Ste P
San Diego, Ca 92123

2004 NOV 4 PM 3 00

Re: Tijuana River Valley Trail Proposal

To Whom It May Concern:

This letter is being written on behave of the boarders of Saddle-Up Ranch and horseman of the Tijuana River Valley. We would like to address the newest proposal for trails in the Tijuana River Valley Regional Park. How can you even begin to think of doing anything with the existing trails or adding trails when the river is in such bad shape? You are just throwing our money away. No trail can exist for hikers and bikers until you control the river, control the garbage that flows from Mexico, control the flow of the river (as it is now, it doesn't flow to the ocean, it just backs up which causes the flooding). Until that problem is solved, you will be replacing this proposed trail year after year after year. Flooding will also destroy the homes and territory of the animals you want to protect.

Also, the existing trails were all agreed upon in 1997 by all of today's proponents. Back then you took trail from us, made us many promises you never kept, made changes behind our backs and now you are starting out this new project doing the same thing.

One misconception you have is that horse's endanger the endangered species located in this valley. You have never told us what species are endangered or showed us figures to prove they are truly endangered or proof that horses are endangering these species. Horses are not the threat. When they walk the trails, they leave a scent of a prey animal. Horses are a prey animal you know. No animal smells danger from them. Photographers, bikers, hikers are the real danger. They leave the scent of a predator. Even a child knows MAN is a predator. That is who is endangering the wildlife.

If the horseman go, illegal alien traffic will increase. We have been the eyes for Boarder Patrol for many years. The increase in illegal aliens will truly hurt not only the environment but also the endangered species you so much want to protect. They do not use the trails, they hide in the plant life and cut the plants to cover themselves up.

You have much bigger problems in this valley to solve before you can begin thinking of a trail system or limiting the horse activity in this valley.

Please rethink your position and plan.

Sincerely,

Deborah Rainaldi, owner Saddle-Up Ranch

2. Brady Bartolin Horseman

3 Wayne D[illegible] horseman

4 Shaulyn Scheller Horseman

5. [illegible] Horseman

6 Erin Kelly

7 [illegible] Horseman

8 Lori Hagan

9 [illegible]

10 [illegible]

11 Janelle Cauchin

12 [illegible]

12. [illegible]

13 [illegible]

13 [illegible]

14 [illegible]

21 [illegible]

22. [illegible]

15 [illegible]

23 Kevin Jay Lawrence

16 [illegible] Horse owner

24. Janet Ready

17 [illegible]

20. Caleb A. Dailey

25 [illegible]

18 Linda Long

26. Karen L Maynard

19 [illegible]

Maeve Henley SD Dept of Parks + Recreation
858-495-5841

10/28/04

2004 NOV 3 AM 9 16

To Whom it may concern,

I'm writing this letter in an effort to help safe our horse riding trails in the Tijuana River Valley.

Horses have always been a huge part of California, San Diego AND specifically the Valley for such a long time. With the last rental stable closed, the demand for horses is even more apparent than ever. I cannot tell you how many times I've been stopped while riding my horse, by people looking to rent horses to ride to the beach. What a concept! Another rental stable, something to do, somewhere to go something to enjoy for all San Diegans and tourists. A place to go for younger people, create jobs....I see families bringing their children to the valley and its ranches to feed carrots to the horses and to pet them. How sad for these little ones to not have that anymore. Where are they going to go? Where are we going to go with our horses? To Del Mar? Keeping horses in the Valley is so much more affordable then anywhere else. And trust me, I have been shopping around before coming back to the Valley. The horse people here are friendly and helpful and courteous , lending a helping hand when needed.

I used to work for one of the rental stables, first located in Goat Canyon and then forced to move to a Hollister street location. On my countless rides through the trails and to the beach I could count on my two hand the pedestrians/birdwatchers I have encountered. That's not very many! I see plenty of birds (probably more now than ever) and wild life which I personally greatly enjoy. I'm sure that everyone else who rides their horse in the TRV feels the same. I doubt anyone would go out of their way to destroy the habitat. Doesn't all the construction and trash take care of that already???? Maybe instead of kicking out us horse people, lets keep construction to a minimum and pick up all that trash that washes through Smugglers Gulch and the River! It would be so much nicer, surely the birdwatchers would appreciate the trash gone more than the horses gone. We can all live along side each other. There are so many trails and space, no one ever feels crowded. Why ruin that with one 14 mile all purpose trail? Where off- roaders, Border patrol, pedestrians, people riding bikes and horses would all have to co-exist and get in each others way. No doubt, someone would get hurt and sued sooner or later. And then what? Close THAT trail too???

Back to the endangered bird habitat: Have you ever tried to go off the trail???? Ever been on a trail that hasn't been used in quite some time? Pretty much impossible, it gets that over grown. So I don't think horses going off the trails is even an issue. We quietly keep ourselves on trails and we don't make much noise. Which is more than I can say about the Border Patrol, riding/speeding on their ATVs through the trails. Now I would think that that kind of noise and exhaust smell would drive the wild life off more than anything. Are we going to eliminate BP activity too? Because then we would have a lot more illegal immigrants and drug pushers come through from Tijuana. How safe would that be for visitors to the Valley? I apologize for sounding sarcastic or bitter. The TRV has been a huge part of my life since moving here from Germany 10 years ago. I can not imagine it not being what it now is anymore.

Horses being ridden on trails, BP around the Valley, helps to keep the crime rate down. It deters illegal immigrants and drug pushers who come through from Tijuana, in turn making it a safer place for all visitors. Us horse people report suspicious activity to the BP when we see it.
Furthermore pedestrians, if we do encounter them on our rides, always have a big smile and praise for our horses.

So I do hope that you consider all I have written in this letter and keep the Valley the way it is, with all its horsemen and women, ranches, visitors, tourists, hikers, bikers, bird watchers, birds, wild life, Border Patrol and whatever else there is (except the trash, I doubt anyone would miss it).
Thank you for taking the time to read through this.

Sincerely, Sasha Soldan

3102 G St, San Diego CA 92102

Owner of 2 horses, boarding at Saddle Up Ranch on Hollister St

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

	e-mail address (optional)
ROLFF VON ALVAREZ	
Name	**Organization**
1227 MELROSE AVE	
Street Address	**Daytime Phone No. (optional)**
CHULA VISTA, ~~CA. 91911~~	CA. 91911-3630
City	**State** **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

THOSE PROJECTS THAT YOU GOT IN MIND
MULTI-USE TRAIL USE plan -- IF
BICICLES & HORSES TOGETHER WOULD MIX OR WORK
WHY DON'T LEAVE THE TRAIL ALONE I OWN A
HORSE AT WIGGINTON RANCH & RIDE my HORSE
ON WEEKENDS I FOUND THEM PERFECT SO FAR

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
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PLEASE PRINT

gacogaco@cts.com
e-mail address (optional)

Guillermo A. Cornejo
Name

Robinhood Homes Park Neighbors
Organization

1960 Bandolier Ln.
Street Address

619 428-0361
Daytime Phone No. (optional)

San Diego
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

October 24, 2004

Dear Ms. Hanley:

My neighbors have commissioned self to write to you and the County about TJ River Park health management.

Several of us exercise in the park (walk, run, ride bikes and visit the play fields. From wee hours in the morning to late afternoon, we exercise along Dairy Mart Rd and its prolongation to Monument Blvd., along Saturn Blvd., on dirt trails including those leading to the beach. We visit and like to throw a ball or play soccer in the new beautifully landscaped fields along the road off Saturn Blvd (I don't remember the name of the off street).

We have two major concerns that stem from improperly managed horse and chicken manure. Daily wind speed in the park area gets up to the mid-double digits depending on the season and time of the day. When walking or running we come into long sections of trails or road that have wind drifted heavy stench of horse manure or wind wiped horse manure droppings. When we walk/run we do it to get at exercise aerobic rate. In the trails or roads, we breathe this air saturated of horse manure smell or wind wiped horse manure dust. Sun dries horse droppings left on the trails/road and it gets to be a health risk. Alternately, right upwind of the new baseball/ soccer parks, there are several chicken pens that dissipate putrid chicken manure stench or chicken manure gas and this stench or gas the children are exposed to taking the fun away from the game. This my grandchildren and I experienced when visiting the beautiful new baseball and soccer fields. It seems the chicken pens are a commercial operation rather than a simple country home food supply; we hear many chicken cockling in the morning or afternoons. We know the horse stables are bona fide commercial operations. Some of them look very well taken care off. Others though, their horse manure they poorly manage it. They pile the manure along the road next to their operation.

I have neighbors and their children that love to walk in the park. They face hard choices. Themselves or their children are allergic to these manure nuisances. Chicken feathers I know a handful of people are allergic to. Feathers are wiped up by the winds making these people very sick. They get sick when visiting with their children the soccer or ball fields. These parents are confronted with making decisions of either letting their children join their peers at games or staying away from he park playing fields because of the chickens.

Walk trails/path to approach the Park along Dairy Mart Rd., between Servando and Plaza de LAS AMERICAS Blvd. are pedestrian unsafe. We have notified the City that the approach to the Park is a dangerous walk as the auto lane white delimiter and the walk path merge. Cars sweep by our heels as we walk towards the Park. It does not make sense to drive to the park a distance less than a fraction of a mile. This is a safety issue that needs prompt attention, we are not getting any proactive response from the City however we got their acknowledgements that it is a significant pedestrian safety issue.

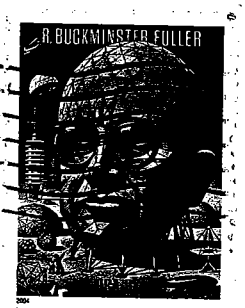
Finally, on the east border of the Park, along Servando all the way to Valentino St., both Servando condominium residents and drivers that come from unknown places, the former litter the park with both fast food glass/aluminum containers or plastic/paper wrappings and the latter ones come to dump broken appliances. The fast food litter gets wind wiped into the bird preserve lagoon at the east-end border of the Park. The appliances become a magnet for more appliance and construction debris dumping. These littering and dumping Ms. Hanley must be stopped by heavy-fine method, as it is an ongoing chronic problem. It must be stopped for the health of the Park and the health of the bird preserve lagoon. Fines can also generate Park maintenance revenue. We have observed that littering and dumping takes place between 6 pm and midnight. Sometimes between 5 am and 7 am. Repeatedly we have notified the police and so far, they pay no attention. We have notified and tried to engage the Audubon Society. No response from them either. Please enforce county regulations.

Ms Hanley, we hope that you and the county find a good compromise so that all of us, including the horse riders and the wild life can share the Park in a safe and healthy way. I am not certain about the commercial chicken pen operations though.

Guillermo Cornejo on behalf of The Robin Hood house neighbors

Cornejo

Please fold in thirds, staple and affix postage.



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Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

FROM:
Robert McDowell
8955 Haveteur Way
San Diego, CA 92123

2004 OCT 22 PM 2 41

TO:

Maeve Hanley
San Diego Dept. of Parks & Rec.
5201 Ruffin Road
San Diego CA 92123

2123+1653

I am writing with regard to the Tijuana River Valley Regional Trails Park. I ~~wo~~ am hopeful that native plant life will be restored to this area and that redundant trails through sensitive habitat areas will be reduced. Please let me know what will be done. Bob McDowell

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

Rhonda Magers **Name**	TRVEA **Organization**
1291 Helix Ave **Street Address**	(619) 934-9070 **Daytime Phone No. (optional)**
Chula Vista **City**	CA **State**
91911 **Zip Code**	

e-mail address (optional)

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

I am here tonight to ask that you please leave our trails open to the horses as that is very important to us. we need to have a calm & safe place to ride & not on the streets, the trails are a very calm place for us to be and we as horse people don't bother the wildlife we enjoy looking at all the animals too. we help clean up the trails and keep things safe out there. Please dont push us out. We wont harm the trails or wildlife. Thank You Very Much.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

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PLEASE PRINT

marty@rcdsandiego.org;
mleavitt@firesafesdcounty.org
e-mail address (optional)

Marty Leavitt, District Manager
Name

Resource Conservation District of Greater San Diego County
Organization

332 S. Juniper St., #110
Street Address

760-745-2061
Daytime Phone No. (optional)

Escondido
City

CA
State

92025
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Possibility of expansion of Tijuana River Valley Community Gardens project (Sunset & Hollister) to include demonstration garden or habitat demonstration project with walking trails, signage, for use with public usage (self-guided tours), educational outreach, workshops, etc. Would require funding/proposal with scope of work and budget for plants, water, irrigation, maintenance, personnel to maintain,cost for outreach, workshops, additional as identified.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

SAN DIEGO BAYKEEPER

November 4, 2004

Ms. Maeve Hanely
San Diego County Department of Parks and Recreation
5201 Ruffin Rd., Suite P
San Diego, CA 92123

Re: San Diego BayKeeper Comments on the Notice of Preparation for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

Dear Ms. Hanely:

Thank you for the opportunity to comment on the NOP for the Tijuana River Valley Regional Park. San Diego BayKeeper is a non profit organization whose mission is to preserve, restore and enhance the region's waters and lands that affect San Diego's coastal areas for the people, plants and wildlife that depend on them. The planned restoration efforts contribute to the goals and objectives identified as priorities by our organization, and we strongly support the Tijuana River Valley Park Project (TRPP). I attended your scoping meeting on October 25 and submitted a short list of written comments. Also, the majority of our issues are covered in the letter sent to you by Environmental Health Coalition (EHC). We concur with the points EHC raised and submit this letter as a supplement to the latter.

The impact of edge effects on rare species such at the least Bell's vireo

One of the primary benefits of the TRPP is that we will finally have an opportunity to plan the area by design rather than perpetuating what has evolved over time by chance. The trails and multiple uses in the area today have evolved over the course of years without a comprehensive plan. As a result the area is not being used optimally. Some trails dead-end and others are redundant. The planning process provides an opportunity to consolidate and plan trails so as to avoid "edge effects." From an ecological point of view the term "edge effect" refers to the negative consequences which result from habitat fragmentation. For example, when habitat is dissected by a trail or road this may result in a physical barrier to the movement of some smaller species. The edge created on either side of the trail or the road also increases access for predators and humans in an otherwise inaccessible area. Scientific research indicates that perhaps the single biggest tool for protecting biodiversity lies in protecting large blocks of contiguous habitat and concomitantly reducing edge effects.

In the Tijuana River Valley edge effects, if not reduced, could have a negative effect on the long-term survival and recovery of the least Bell's vireo. Cowbirds, a competitor of the vireo, access vireo habitat via edges such as those that are formed by trails, and are therefore able to enter dense natural habitat which would otherwise be inaccessible. Although cowbirds in the area are currently trapped, we do not know if funding will exist in perpetuity. Additionally, it is important to realize that cowbirds can be a problem even when horses are not present: cowbirds from surrounding agricultural areas may enter the

2924 Emerson St., Suite 220 • San Diego, CA 92106
619-758-7743 / FAX 619-758-7740 / **Pollution Hotline 1-877-4CACOAST**
Email: sdbaykeeper@sdbaykeeper.org / **Web Page: http://www.sdbaykeeper.org**
A 501(c)(3) non profit organization and member of the international Water Keeper Alliance

natural habitat simply because edges created by trails exist, even in the absence of horses. Of course, we believe that long-term funding for important restoration projects such as this one are key, but to the extent that we can both trap cowbirds and reduce edge effects, the wildlife in the area will benefit.

Careful design for multiple uses

We believe that is it very important that the park by available to multiple types of uses and that public users from the region feel welcome and comfortable using the park. The many uses that are envisioned for the area – equestrian, hiking, biking, bird watching, etc. – must be carefully designed and monitored to ensure the safety of all. In particular, if there are single track tails, this can lead to some potentially unsafe conditions as well as conflicts among the varied users.

Additional water quality impacts

Water quality issues associated with horse stables should be addressed through the stormwater permit. If Best Management Practices (BMPs) are not put in place, runoff from stables can add harmful nutrient loads and bacteria to the estuary. Currently, the Tijuana Estuary is on the list of impaired water bodies. The process for establishing a Total Maximum Daily Load for bays and estuaries is beginning sometime in the near future. Proactive planning for the incorporation of BMPs will ensure that the estuary is not further impaired.

Trails should be kept out of flood prone areas as much as possible. This will reduce the generation of sediment laden runoff. Also, adequate buffers should be designed to protect environmentally sensitive areas such as wetlands.

Additionally, noxious weeds that have the potential to spread via horse waste should be addressed in terms of their impact on the estuary. The relevant federal agencies all have strict policies regarding horses and weed-free hay. These should be consulted and incorporated into the plan.

The Tijuana River Valley project provides an incredible opportunity for nature based recreation. The opportunities for equestrians, bikers, hikers, bird-watchers and others will be unique. The trick is in balancing the opportunities so they are equitable for all, while carefully protecting, managing, and enhancing the wildlife value in the area. With careful planning it can be done, and we are pleased to be a part of the process. Thank you very much for considering our comments. Please contact me at 619-758-7768 with any questions. Thank you.

Sincerely,

Allison Rolfe

Allison Rolfe
Policy Director

SAN DIEGO BAYKEEPER

2924 Emerson St., Suite 220
San Diego, CA 92106

SAN DIEGO CA 921
PM
5 NOV
2004

ALWAYS
ZIP

2004 NOV 8 PM 3 04

Ms. Marie Harley
SD. County Dept. of Parks + Rec
5201 Ruffin Rd, Suite P
San Diego, CA
92123

92123+1653

TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

Momorgante@yahoo.com
e-mail address (optional)

Michelle Morgante
Name

Resident
Organization

3748 Janse Way
Street Address

619-231-9365
Daytime Phone No. (optional)

San Diego
City

CA
State

92173
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

As a home owner in Coral Gate, the San Ysidro neighborhood of single-family homes on the southeastern edge of the park, I would like to see greater trail development in the area bordered by Interstate 5, Dairy Mart Road and Camino de la Plaza. Under the current proposal, there are no new trails offered for this corner.

Residents of Coral Gate are very family oriented and in the evenings, you will see whole families, sometimes three generations all together, walking the sidewalks that border our neighborhood and run along the busy four-lane Camino de la Plaza. What a wonderful alternative it would be to have a pedestrian trail available in this portion of the park that is adjacent to our neighborhood.

I applaud those who are working to develop the rest of the park, but urge you not to ignore this treasured corner in the southeast. Since horse riders are pressing to have more horse trails retained in the remainder of the park, I would like to see this small corner devoted to a pedestrian trail, or at least a trail that could be shared by pedestrians, runners, and cyclists (including children such as my young son who would love to be able to bicycle among trees and native plants instead of only along our suburban sidewalk.)

Another reason to encourage greater public use of this corner is to discourage the homeless encampments which have cropped up there in the last two years. This is raising safety concerns for many Coral Gate residents, including the threat of campfires spreading out of control. Already, one time this year I have awoken to find fire crews fighting a brush fire within yards of my backyard fence. Developing pedestrian trails in this corner would improve access to the park, encourage public use of it and thereby discourage the squatters who have claimed this area for themselves.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

10/27/04

Dear Maeve Hanley,

It has come to my attention that the value of equestrian trails in the Tijuana River Valley are being questioned.

I have ridden regularly in the valley for the last 7 years and feel very strongly that the equestrians are the eyes and ears of the TRV.

Not only does our presence discourage transients from setting up shelters, we are the ones who alert authorities to suspicious or illegal activities.

There is no proof that the existing horse trails have any negative effect on wildlife. I consider myself an ecologist and nature is extremely important to me. I am saddened that we no longer have a rental ~~stable~~ stable in the TRV so that others have limited access to the exceptional beauty of the area.

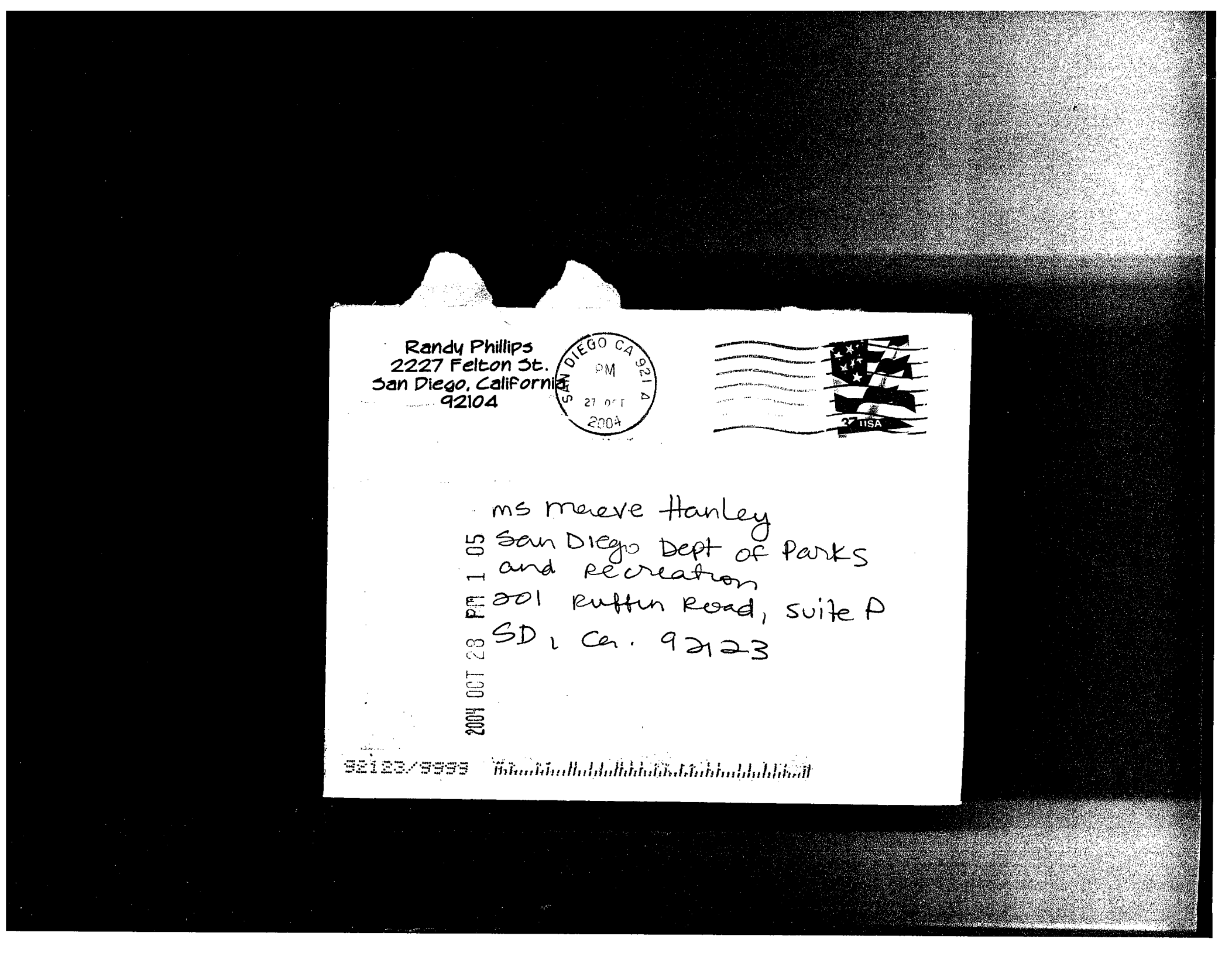
I strongly encourage YOU to EXPAND equestrian recreation in the area, to protect the existing trails and to support the economy of the area by standing behind the many people who thrive because of equestrians.

Please feel free to contact me directly.

Randy Phillips LCSW
2227 Felton St.
San Diego, Ca.
92104

Phone: (619) 284-6169
Email: RandyPhillips7@Cox.net

P.S. I am not a member of TRVEA for personal reasons but am fully supportive of all the good they do for those of us who ride and who love the TRV.



Randy Phillips
2227 Felton St.
San Diego, California
92104

SAN DIEGO CA 921 A
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27 OCT
2004

27 USA

ms Meeve Hanley
San Diego Dept of Parks
and Recreation
202 Ruffin Road, suite P
SD, Ca. 92123

2004 OCT 28 PM 1 05

92123/9999

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

Randy@McCarthyTransfer.com
e-mail address (optional)

Randolph S. Smith
Name

None
Organization

1747 Hollister St. #24
Street Address

w) 619-596-2594
Daytime Phone No. (optional)

San Diego
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

I would like to see nothing at all done to the 60 acres East of the ball parks on Sunset. There are many people who walk their dogs there and let them run free. I know this would come to an end.

(Maybe throw some Bluegill in the pond.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

2004 NOV 3 AM 9 16

Phillip C. Roullard • Photography

8529 Jackie Drive • San Diego, CA • 92119-1936
tel/fax (619)698-9512

Maeve Hanley,
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

Dear Ms. Hanley,

I have volunteered and worked at the Tijuana Estuary for eighteen years and know the area very well. I feel that on the whole, horseback riding is not a compatible activity in the Tijuana river valley.

There are way too many trails in the river valley now. The more trails that are used by horses the more fragmented the fragile river valley habitat becomes. Least Bell's vireos need open space in order to thrive. Not open space from a multitude of trails but open space with no human activity to disturb the vireos. The existing trails also exacerbate the problem of cowbirds parasitizing the nests of the vireos. The horses bring flies with them and thus encourage cowbirds that eat the flies to settle in the river valley.

A central, single trail would funnel the horses and other users through the habitat so that there would be a minimum of disturbance through critical habitat. I encourage the option of a single, multiple use trail instead of maintaining multiple trails through the river valley.

Yours truly,

Phillip C. Roullard

[redacted]

October 28, 2004

Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Riffin Road, Suite P
San Diego, CA 92123

Dear Ms. Hanley:

I would like to offer the following comments to the draft of your Trails and Habitat Enhancement Project for the Tijuana River Valley Regional Park. Although I am associated with various user groups that have an interest in the valley (such as the Audubon Society), the following comments represent my own thoughts only.

The Department is to be commended for striving to achieve a balanced plan reflecting the desires of the various user groups as well as the need for sensitive habitat protection.

The valley, as you know, is one of the most significant natural areas in the county, and you have rightly taken steps to protect biodiversity there. The new "Bird and Butterfly Garden" is especially to be applauded. As a general policy within the valley, I urge you to make recreational activities deferential to the goal of protecting prime habitat areas.

With regard to trails, it would be desirable to separate bicycle and equestrian trails wherever possible. I am involved with planning the trail system for the San Dieguito River Park, and I know from experience that such a separation will preclude many potential conflicts. There is less incompatibility between hikers and horses, but here too separation is desirable. I appreciate that three independent trail systems would be more expensive, but the Valley is generally flat and the extra expense for separate trails would be less than in other areas that are more topographically complex.

If equestrian users and hikers are to utilize the same trail(s) in the Valley, I would urge the construction of frequent small "turn-outs". The nature of the Valley's fauna will result in a large number of the hikers being birders, who necessarily stop frequently to check out bird activity wherever it happens to occur. This can create a problem with regard to both bikes and horses if they happen to be using the same trail. The

construction of frequent small "turn-outs" along the hiking trails, especially at likely bird viewing locations, will allow the birders to step off the trail and not be a possible impediment to bikes or horses, making the recreational experience more pleasant for everyone. This would not be much of an added expense; indeed, the "turn-outs" would not even need to be paved or otherwise improved.

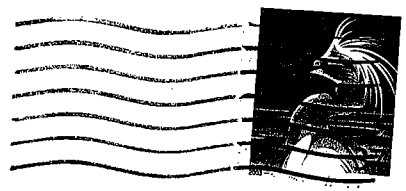
Thank you for your attention to these comments. Please place me on your mailing list to receive notification of future public meetings, etc.

Sincerely,

Philip R. Pryde
7784 Cedar Lake Ave.
San Diego, CA 92119
619-465-9492

Philip R. Pryde
7784 Cedar Lake Ave
San Diego, CA 92119-3019

SAN DIEGO CA 921 A
PM
30 OCT
2004



Ms. Maeve Hanley
S.D. County Dept. of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

2004 NOV 1 PM 1 12

9212341653

FROM: Patricia Rogers
6591 Eldridge St
San Diego CA 92120

2004 OCT 25 PM 3 27

TO: Maune Hanley
San Diego Dept of Parks & Recreation
5201 Ruffin Rd,

© USPS 2002 recycled

Dear Maune,

I am concerned about the Tijuana River Valley Project. I am asking for restoration of the area, closing redundant trails and trails through sensitive habitat areas. I care about native plants of California and preserve the habitat for your grandchildren & mine. I would appreciate a response.

Thanks, Patricia C. Rogers

6591 Eldridge St
San Diego CA 92120

Hanley, Maeve

From: Adamfam2@aol.com
Sent: Thursday, November 04, 2004 12:06 AM
To: Hanley, Maeve
Subject: Tijuana River Valley

Maeve Hanley, M.S.

Environmental Resource Manager

Department of Parks and Recreation

5201 Ruffin Road, Suite P (MS029)

San Diego, CA 92123

Ph: (858) 694-2968

Fx: (858) 495-5841

Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK

TRAILS AND HABITAT ENHANCEMENT PROJECT

Comment Form

Email (optional)____adamfam2@aol.com_____

Name __Nancy Adam, MD_____ Organization __TRVEA_____

Address _1099 1st St #104 _____

phone (optional) ___619-437-6776_____

City ___Coronado_____ State ____CA__ Zip _92118____

Where are the TRAIL ENHANCEMENT parts of the project???

Keep what is already there for the horses and <u>enhance</u> by adding at least one 2-acre community arena with the same kind of amenities you added for the great ball fields! Build bleachers and a 2 story announcing booth like Sweetwater has so that we can have horse shows and educational opportunities for the horse people and the community. Include several washstands, porta-potties, horse-trailer

parking, regulation size arena, facilities for team-penning, water troughs, picnic tables, BBQ's and 20 corrals. Use land on the NE of Hollister & Sunset.

Add overnight horse camping with water and bathrooms and at least 12 corrals. This would bring people from all over the state! Place this at the Staging Areas

Add a Mounted Assistant Unit to regularly patrol all of the Regional Park, State & Federal parts of the park on horseback.

Add markers along the trails for reference for emergency use. Health and safety have not been addressed. Markers would help MAU report problems or get help in emergencies. (fire, shooters, paint balers, motorized vehicles, alcohol or drug use, etc.)

Facilitate the building of a Friends of TRVRP with at least one member from each of the interested, affected groups: businesses, farmers, horsemen, Mounted Assistance Unit, TRVEA, etc.

Keep all of the narrow horse trails that TRVEA has on their maps (MOU Officially Sanctioned trails) including Wycliff, Sherwood, Cathedral, Brian's Bridle, Beach Trail, South Berm and PERL Rd..

Dedicate at least 5 acres for a RENTAL STABLE for the public. Lease it for 20 years for a nominal fee. Locate it on the NE corner of Hollister and Sunset.

Guarantee horse trail connections to all horse-related business and farms and the mesas, beach, horse trails, and multi-purpose trail.

MISIONERO®
VEGETABLES
FLOYD GRIFFIN
1129 Harkins Road • Salinas, CA 93901
831/757-3033 • FAX 831/758-1728
Sales 831/424-7063
fgriffin@misionero.com
http://www.misionero.com

LLEY REGIONAL PARK ENHANCEMENT PROJECT
nent Form

ase provide any comments or questions you would like vironmental Impact Report (EIR) that the County of San 2004, you may submit your comments on this form and ax at the number below or by mail to the address on the y, San Diego County Department of Parks & Recreation at oject.

reverse of this form.
(858) 694-2968 for more information on

PLEASE PRINT

FGRIFFIN@MISIONERO.COM
MGRIFFIN1@COX.NET
e-mail address (optional)

FLOYD GRIFFIN
Name

MISIONERO VEGETABLES
Organization

17045 BUTTERFIELD TRAIL
Street Address

858-451-2250
Daytime Phone No. (optional)

POWAY
City

CA.
State

92064
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Misionero Vegetables farms approximately 3,000 acres in the Salinas Valley, California and 3,000 acres in Yuma, Arizona producing packaged salads, iceberg lettuce, romaine lettuce, green leaf and red leaf lettuce, broccoli and carrots. Misionero also farms special lettuces, celery hearts, strawberries and edamame on U.S. Navy property north and adjacent to Sunset Avenue on Saturn Blvd.

The Tijuana River Valley Regional Park has a micro-climate irreplaceable for certain vegetables. Agriculture should be considered to a greater extent in your plans. Agriculture is compatable with horses, birds and plant ecology. Don't minimize your valuable agriculture asset.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Please fold in thirds, staple and affix postage.

2004 OCT 29 PM 1 29

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310 29

FROM: K. Coelho
3204 1/2 31st St
SAN DIEGO, CA 92104
21 OCT
2004

2004 OCT 22 PM 2 41

TO: MAEVE HANLEY
SAN DIEGO DEPT OF PARKS & Recreation,
5201 Ruffin Rd
Suite P, San Diego, CA 92123

2123+1653

I am concerned about the plight of the California native plants & want to preserve their habitats for future generation.
I would appreciate it if you could respond to my request Thank you
Kimberly Coelho

FROM:
FILLIUS
6737 WELMELST
SAN DIEGO, CA 92122

SAN DIEGO CA
OCT
2014

2014 OCT 22 PM 2 41

TO: MAEVE HANLEY,
SAN DIEGO DEPT. OF PARKS & REC.,
5201 RUFFIN LD, SUITE P,
SAN DIEGO
CA 92123

32123/4810

I AM A CONCERNED CITIZEN WHO IS SEEING A STARTLING LOSS OF LOCAL HABITATS, ESPECIALLY COASTAL SAGE SCRUB. WHEN ORGANIZING THE EIR for the TIJUANA RIVER VALLEY REGIONAL PARK TRAILS & HABITAT ENHANCEMENT PROJECT, PLEASE CONSIDER CLOSING SOME TRAILS, ESPECIALLY IN AREAS WITH THREATENED/ENDANGERED PLANTS (CALIFORNIA NATIVES). PLEASE ALSO CONSIDER RESTORING AREAS THAT HAVE BEEN DAMAGED/HITE MANY EXOTIC PLANTS WITH NATIVE PLANTS. Margaret Fillius

M Justine Vargas
6861 Briarwood Dr
Carlsbad, CA 92009

2004 OCT 21 PM 2 18

To: Maeve Hanley
San Diego Dept of Parks + Recreation
5201 Ruffin Rd, Suite P
San Diego, CA 92123

+4310

Dear Maeve Hanley,

I am writing you concerning the Tijuana River Valley area. Though I cannot make the meeting Oct 25, I would like to take the time now to urge you to consider San Diego's native plants and wildlife. Please close redundant trails and help to restore the native habitat.

Thank you.

Justine Vargas

FROM: Catherine MacGregor
749 Olive Avenue
Coronado CA 92118

2004 OCT 21 PM 2 18

TO: Maeve Hanley
San Diego Department of Parks & Rec
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

Dear Maeve:
Im very excited about the Tijuana River Valley Trails and Habitat Enhancement Proseed as an opportunity to improve this area and protect or enhance our great resource. Please make sure the plan emphasizes habitat restoration, closing of trails thru sensitive habitat areas, and closing of redundant trails. This is a precious area with lots of interesting vegetation & sensitive species. Please respond and share your views. Thank you! Catherine MacGregor

FROM: BRIAN SWANSON
3282 Meadow Crest Pl
Escondido, CA 92027

2004 OCT 21 PM 2 18

TO: Maeve Henley
Dept of Parks & Rec,
City of SD
5201 Ruffin Rd, Ste P
San Diego, CA 92123

92123/4310
© USPS 2002 recycled

Dear Ms Henley,

I lead natural history walks throughout San Diego County. Our wetland & coastal habitat is increasingly threatened. Please restore the disturbed area within the ~~Sweet~~ Tijuana River Valley Regional Park trails & Habitat Enhancement Project. Close redundant trails & travel through sensitive habitat areas. I care about this habitat & the birds, insects, reptiles & mammals (& fish!) that it supports.

Brian

Brian D. Swanson
3282 Meadow Crest Pl. Escondido, CA
92027

FROM:

MIKE GONZALES
790 CROMWELL WAY
VISTA, CA. 92084

2004 OCT 21 PM 2 18

TO:

MAEVE HANLEY
SAN DIEGO DEPT. OF PARKS & RECREATION
5201 RUFFIN ROAD, SUITE P
SAN DIEGO, CA. 92123

92123+4310

PLEASE CLOSE REDUNDANT TRAILS AND CLOSE TRAILS THROUGH SENSITIVE HABITAT AREAS IN TIJUANA RIVER VALLEY REGIONAL PARK. ALSO, PLEASE ENSURE NATIVE HABITAT RESTORATION ASSOCIATED WITH THE DRAFT EIR FOR THE TRAILS & HABITAT ENHANCEMENT PROJECT. PLEASE RESPOND.

FROM:
JUDY ZANOLLI
2601-7 Calle de Encinas
Valley Center CA 92082

DIEGO CA

ALWAYS

Carlsbad Caverns National Park, NM

2004 OCT 21 PM 2 18

TO:

Maeve Hanley
San Diego Dept P+R
5201 Ruffin Rd
Suite P
San Diego, CA 92123

92123+4310

Please help restore
the area & close sensitive
trails on the Tijuana
Estuary project.

Thanks

FROM:
Don Hohimer
2950 Klucewich Rd.
Alpine, CA 91901

2004 OCT 21 PM 2 19

TO: Maeve Hanley
SD Dept. of Parks + Rec
5201 Ruffin Rd. Suite P
San Diego CA 92123

92123+1653

I care deeply for our native flora. Please protect their habitats and restore those that have been degraded. Thank you.

FROM: H. Leffert
UCSD-0636
La Jolla CA 92093

2004 OCT 21 PM 2 19

TO: Maeve Hanley
San Diego Dept. Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+1653

Blank card.
No comment.

FROM: PH St Clair
2341 Whittier St
San Diego CA 92103

2001 OCT 21 PM 2

TO:
Maeve Hanley
Parks Dept
5201 Ruffin Rd Suite F
San Diego CA 92123

21234+1653

Dear Maeve,

Tijuana River Valley Regional Park is suffering from invasive & exotic plants. I visit often to watch birds. I was shocked at the new plantings of non-natives & invasives. Please restore this Park w natives. Eliminate redundant Trails. Peter H St Clair.

FROM: PAUL EVANGELISTA
26017 CALLE DE RANCHO
VALLEY CENTER, CA 92082

2004 OCT 21 PM 2

TO:

MARVA HANLEY
SAN DIEGO DIST P&R
5201 RICHTON ROAD
SUITE 7
SAN DIEGO, CA 92123

92123+1653

PLEASE RESTORE AREA AND CLOSE REDUNDANT TRAILS AND TRAILS THROUGH SENSITIVE HABITATS.
PLEASE PRESERVE HABITATS FOR THE FUTURE GENERATION.
PLEASE SEND RESPONCE.

P. Jan

FROM: Arne Johanson
17269 Silver Gum Wy
S.D., Ca 92127

To: 2004 OCT 21 PM 2

Maeve Hanley
S.D Dept Parks & Rec.
5201 Raffin Rd Suite P
San Diego, Ca 92123

92123+1653

Ms Hanley,

Please act quickly to save and restore the Tijuana River Valley. This is an important area for plants, animals, the estuary and me. I care about the world and our own local habitat areas. I am ready to help with trail work, erosion control, native revegitation because we need it. I look forward to being able to share this area with children yet to be born. Thank You

ARNE J.

FROM:
LARRY KLAASEN
4821 LOUISE DR.
SAN, DIEGO 92115

SAN DIEGO CA 921
PM

2004 OCT 21 PM 2 20

TO:
San Diego Parks & Rec
Attn Mdeve Hanley
5201 Ruffin Rd Suite P
San Diego CA 92123

B21204A653

re: Tijuana River Valley

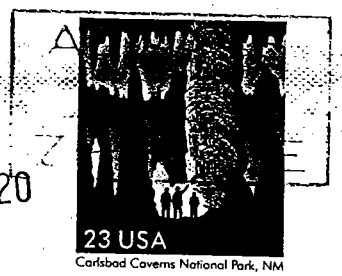
This beautiful valley has been neglected for too long. Please take action to have the valley restored to its native plants & animals. I want to see the natives returned, and the non-native plants removed.

Thank you

Larry Klaasen

FROM:
P. Klaasen
4821 Louise Dr.
San Diego, CA 92115

SAN DIEGO CA 920
PM
21 OCT
2004



2004 OCT 21 PM 2 20

To:

Maeve Hanley
San Diego Dept of Parks & Recreation
5201 Ruffin Rd, Suite P
San Diego, CA 92123

92123416553

I hope for restoration efforts in the Tijuana River Valley Regional Park, including closing of redundant trails and trails thru sensitive habitat areas. Native plants are important to me and for future generations. Preservation of their habitats is imperative.

Please respond.

Pat Klaasen
4821 Louise Dr.
San Diego, CA 92115

FROM: Teresa Norris
13025 Via Del Toro
Poway, CA 92064

2004 OCT 21 PM 2 20

TO:

Maeve Hanley
SD Parks and Rec.
5201 Ruffin Rd Suite P
San Diego, CA 92123

16 Oct 04

Dear People,

I am writing in support of protecting the Tijuana River Valley. Please restore the area by closing redundant trails and ~~trails~~ trails through sensitive habitat areas. I am a member of the CA Native Plant Society and want to preserve the native plants for future generations.

Please respond to this card. Sincerely,
Teresa Norris

FROM: Fotine Fahrens
2436 A St
S.D. CA 92102

2004 OCT 21 PM 2 20

TO: Meave Henley
S.D. Dept. of Parks + Rec
5201 Ruffin Rd.
Suite P,
S.D. CA 92123

92123+1653

Dear Maeve Henley
Please restore the Tiquena River Valley Regional Park Trails + Habitat and close redundent trails + trails through sensitive habitat areas.
I urge you to care about California native plants and preserve their habitats for future generations
Thank you. Fotine Fahrens

FROM:
Joseph Unger
6861 Briarwood Dr.
Carlshad, CA 92009

SAN DIEGO CA 921
PM
2004 OCT 21

To:
Maeve Hanley
San Diego Dept. of Parks
5201 Ruffin Rd. Suite P
San Diego, CA 92123

92123+1653

I'm concerned about the proliferation of trails in the Tijuana River Valley. Please consider closing redundant trails to allow the restoration of native habitat.

FROM: Lisa Markovchick
2821 Nimitz Blvd Apt C
San Diego, CA 92104

2004 OCT 21 PM 2 20

TO: Meave Hanley
San Diego Dept of Parks + Rec
5201 Ruffin Rd, Suite P
San Diego, CA 92123

92123+1653

Dear Meave,

Regarding the Tijuana River Valley Regional Park Trails & Habitat Enhancement Project Draft, please restore more area. Close redundant trails and trails through sensitive habitat areas. I and my family love CA's native plants and animals and we need to preserve them for our children. Please send me an update to tell me what you've done to this end. Thanks, Lisa

FROM: JEREMY SISSON
375 ACACIA AVE #24
CARLSBAD, CA 92008

2004 OCT 21 PM 2

Carlsbad Caverns National Park, NM

TO: MAEVE HANLEY
SAN DIEGO DEPT. OF PARKS & REC
5201 RUFFIN ROAD, SUITE P
SAN DIEGO, CA
92123

92123+1653

MAEVE HANLEY,

I STRONGLY URGE YOU TO TAKE INTO CONSIDERATION THE RESTORATION PARK INCLUDING THE CLOSURE OF REDUNDANT TRAILS & TRAILS THROUGH SENSITIVE AREAS. THE VALLEY IS HOME TO MANY ENDEMIC NATIVE PLANTS WHICH NEED TO BE PRESERVED FOR FUTURE GENERATIONS TO STUDY & ENJOY.

THANK YOU FOR YOUR TIME & I'D APPRECIATE A RESPONCE.

SINCERELY Jeremy Sisson

FROM:
Debbie O'Neill
2966 Cordrey Dr.
Escondido, CA 92029

2001 OCT 21 PM 2 21

TO: Maeve Hanley
S.D. Dept. of Parks & Recreation
5201 Ruffin Rd. Ste P
San Diego, CA 92123

23

Please help protect the native CA plants & vegetation of the Tijuana River Valley. The sensitive habitat areas need protection from excess trails, and damage areas need to be restored.

Thank you for your consideration of this matter.

Debbie O'Neill

Forbett
Jensmyr St
iego 92123

DAMAGED IN HANDLING
IN THE POSTAL SERVICE

2001 OCT 21 PM 2 21

TO: Maeve Hanley
San Diego Dept of Parks & Rec
5201 Ruffin Rd Suite F
San Diego 92123

I support the restoration of the T. J. River Valley Park area. We need to res and protect our rare and precious native habitats. I also think to do this it is necessary to reduce trails through the sensitive habitats.

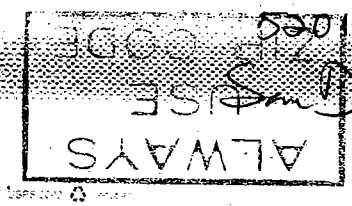
I would appriate hearing back.

Glenn Tobey

FROM:
Martha Law-Edwards
1310 Pine Ave
Carlsbad CA 92008

2004 OCT 21 PM 2 21

To: Maeve Hanley
S.D. Dept. of Parks, Rec
Ruffin Rd Ste P
San Diego CA 92123



Water is precious and one of the most serious challenges we will face in this century. Please use that fact as a basis for the Tijuana River Valley Project decision.

Thank you!

FROM: Stacy Bermingham
11210 Corte Belleza
San Diego, CA 92130

2004 OCT 21 PM 2

To:
Maeve Hanley
San Diego Dept. of Parks
and Recreation
5201 Ruffin Road
Suite P
San Diego, CA 92123

Dear Ms. Hanley,

This postcard is being written to urge the following:

(1) An environmental restoration in the Tijuana River Valley Regional Park

(2) A closing of redundant trails and trails through sensitive habitat areas. This makes sense!

This area should be valued for its true environmental worth. I care that Native Plants be preserved. Thanks, Stacy Bermingham

P.S. Please respond.

FROM:
KARIN ZIRK
2686 HORNBLEND ST
SD CA 92109

Carlsbad Caverns National Park, NM

2004 OCT 21 PM 2:22

TO:

MAEVE HANLEY
SD DEPT OF PARKS & REC
5201 RUFFIN RD #P
SD CA 92123

92123/4310

The Tijuana River Valley
is a critical ecosystem.
We must restore & rehab
the land & preserve: one
of the last remain examples
of coastal river valley
in San Diego
Regards

FROM: Daniel Willford
1917 Mission Ave
San Diego CA 92116

2009 OCT 22 PM 2

To: Maeve Hanley
San Diego Dept of Parks & Rec
5201 Ruffin Rd. Ste P
San Diego, CA 92123

to Meave Hanley,
I would like to ask for restoration of the Tijuana River valley by closing redundant trails through sensitive habitats areas. I am a supporter of California Native plants and want to preserve them for future of all generations. Please respond to this issue and let me know what is being done. Thanks Daniel Willford

FROM: Jenny Geyser
9263 Regents Road #B401
La Jolla, CA 92037

2009 OCT 22 PM 2 41

To: Maeve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Maeve Hanley,

I am writing to request the restoration of the Tijuana River valley regional park trail. I also support the closing of redundant trails, and trails through sensitive habitat areas.

I sincerely care about California native plants and would like to preserve their habitats for future generations.

I would appreciate a response on this matter. Thank you so much,

Jenny Geyser

FROM:
~~Maeve Ha~~ M. Wonsidler
3204 1/2 31st St
San Diego CA 92104

2004 OCT 22 PM 2 41

Carlsbad Caverns National Park, NM

TO: Maeve Hanley
SD Parks & Rec
5201 Riffin Rd. Ste P
San Diego CA 92123

2123/4310

I care about Native Plants & want to preserve their habitat in the Tijuana River Valley Regional PARK.

Please restore this area for native plants. Please let me know your position on this issue.

THANK YOU,
your resident Mike Wonsidler

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT Mike Aaron
513 1/2 Emory St.
Imperial Beach, CA. 91932

e-mail address (optional) # 203-0810

Name Becki Grossi /
513 1/2 Emory St.
Imperial Beach, CA. 91932

Organization Private

Street Address (optional)

Daytime Phone No 423-1321

City

State

Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary). I've been Riding Horses in this Valley over 20 Years - We used to have open trails & Free Riding - Now we have someone in Suits & Ties coming in and pinning Ribbons & Bows telling us where we allowed to Ride - People who don't Know this Valley or our trails, ~~Also~~ Nor the enjoyment & pleasure & Appreciation of what ~~were~~ we have been blessed with. And these people Making the Rules for Residents & Equestrian Riders, that we have to live by - HAVE PROBABLY NEVER EVEN BEEN ON A HORSE !!

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project - State Clearinghouse #2004091159

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

2004 NOV 4 PM 2 59

Hanley, Maeve

From: Rayfornario@cs.com
Sent: Thursday, November 04, 2004 5:45 PM
To: Hanley, Maeve
Subject: Tijuana River valley

Maeve Hanley, M.S.

Environmental Resource Manager

Department of Parks and Recreation

5201 Ruffin Road, Suite P (MS029)

San Diego, CA 92123

Ph: (858) 694-2968

Fx: (858) 495-5841

Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK

TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Email (optional)Rayfornario@cs.com
Name __ray fornario Organization __TVEA
Address 177Ebony Aveue, Unit B phone (optional)
_____

City ___Imperial Beach State _____CA
Zip __91932

Where are the TRAIL ENHANCEMENT parts of the project???

Keep what is already there for the horses and enhance by adding at least one 2-acre community arena with the same kind of amenities you added for the great ball fields! Build bleachers and a 2 story announcing booth like Sweetwater has so that we can have horse shows and educational opportunities for the horse people and the community. Include several washstands, porta-potties, horse-trailer parking, regulation size arena, facilities for team-penning, water troughs, picnic tables, BBQ's and 20 corrals. Use land on the NE of Hollister &Sunset.

Add overnight horse camping with water and bathrooms and at least 12 corrals. This would bring people from all over the state! Place this at the Staging Areas

Add a Mounted Assistant Unit to regularly patrol all of the Regional Park, State &Federal parts of the park on horseback.

Add markers along the trails for reference for emergency use. Health and safety have not been addressed. Markers would help MAU report

problems or get help in emergencies. (fire, shooters, paint balers, motorized vehicles, alcohol or drug use, etc.)

Facilitate the building of a Friends of TRVRP with at least one member from each of the interested, affected groups: businesses, farmers, horsemen, Mounted Assistance Unit, TRVEA, etc.

Keep all of the narrow horse trails that TRVEA has on their maps (MOU Officially Sanctioned trails) including Wycliff, Sherwood, Cathedral, Brian's Bridle, Beach Trail, South Berm and PERL Rd..

Dedicate at least 5 acres for a RENTAL STABLE for the public. Lease it for 20 years for a nominal fee. Locate it on the NE corner of Hollister and Sunset.

Guarantee horse trail connections to all horse-related business and farms and the mesas, beach, horse trails, and multi-purpose trail.

October 29, 2004

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road
San Diego, CA 92123

RE: TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT – COMMENT FORM

Dear Ms. Hanley:

Thank you for organizing the Scoping Meeting on October 25, 2004 and allowing members of the community and other interested parties to comment on the progress of the above referenced project. We are sure you would agree that it was a good turn out with representation of all the various interest groups involved with this project. We would also like to commend the Committee on enforcing a structure by which everyone was urged to prepare their comments in written format rather than turning the Forum on October 25, 2004 into a "free for all" which has been the case in the past. This ensured a much more organized and non-emotional forum for which people to express their concerns and ask questions.

We would now like to offer our comments on the Plan in its current state:

2. **EXISTING HEALTH AND SAFETY CONCERNS IN THE AREA DO NOT APPEAR TO HAVE BEEN CONSIDERED IN THE OVERALL PLAN:** These issues include many that those of us who already frequent and enjoy the Tijuana River Valley deal with and in some cases endure. Examples would include patrolling the area in order to enforce and prevent the illegal practice of trash dumping. We all know that this area is a flood plain. However, as is evident after our first winter storm, multiple issues arise after rainy periods when trash and sewage, when combined with the areas that are unfortunately already poorly equipped to handle the water, wash out not only trails but roads when trash, sewage and/or silt is deposited (such as Dairy Mart Road). Another example of existing health and safety concerns that have not already been dealt with is the property formally known as the "Triple S Ranch" (at the far-west end of Sunset Road). Whomever (the County?) has purchased this property and has not yet attempted to remove existing health and safety concerns and it continues to be an major dumping ground, complete with abandoned vehicles and other elements which contribute to a potentially dangerous environment as well as encouraging illegal activity and unsafe conditions for the general public. In this instance, wouldn't a better use of funds be to finish what was started by cleaning up some of these areas before spending more funds to improve or beautify others where it is possible that the same thing will happen there? The current plan was described as both "coherent and comprehensive"; there is nothing either coherent or comprehensive about a plan that proceeds without effectively resolving **existing** problems in the area.

3. **PLANNED USE FOR SHARED MULTI-USE TRAILS IS DANGEROUS AND WILL RESULT IN DEGRADATION OF THE OUTDOOR EXPERIENCE FOR ALL:** The plan in its current state is comprised of an approximately 14 mile, six-foot multi-use trail. It is intended that this trail be shared by equestrians, hikers and the mountain biking community. There would seem to be several flaws that need to be considered in this component of the plan; there are at least two areas of concern here:

- **Horse manure management** (hikers and bikers will not want to share a trail with the horses and the waste that is a natural byproduct of the equestrian activity that will occur on this trail). How will this be handled? Horse manure and urine made by the horses would be unpleasant (and a potential health threat) to the other factions who will be using the multi-use trail, but is it fair to make the equestrians clean up after their horses, or worse, wear diapers? If some of the trails can remain for equestrian only, this will remove this potential problem before it ever begins; in that way, other uses will use the space "at their own risk" and the issue of multi-use will be dealt with as it is now.
- **Safety concerns:** Horses, by their nature, can sometimes be easily excitable and "spooked". Even the best trained horse will respond negatively when something unknown is presented to them. This includes, but is not limited to, loud noises, rapid and unsuspected movement, dogs, bicycles, wheelchairs, and children who may be excited to see the horses making loud exclamations and running toward a horse. Sharing of the trails (especially such a small area) is just asking for trouble. Someone is going to get hurt, or worse, killed. Tensions will continue to escalate between the different groups as we all attempt to fit a round peg in a square hole. The area that has been described as currently being under-used will very rapidly become over-used. In effect, this will be taking the park away from ***all*** of the groups by creating an environment that will be difficult for all to enjoy. It was mentioned that an etiquette plan is being proposed to deal with some of these issues but this too would seem to be an ill-advised idea with the potential of disastrous effects to force people, horses, bikes and/or wheelchairs into the same small trail. The trails that have been called "redundant" offer the option to avoid some of these circumstances. It will also degrade the experience for all involved. Equestrians, bikers, and birders or hikers are **all** outdoor enthusiasts; they all seek out the solitude and quiet this area currently offers. While it is a wonderful idea that parts of the area should be made available to all individuals, a better plan would be to allow areas where each activity can be enjoyed safely and protect the "outdoor" experience instead of offering some sort of "outdoor" super highway – which will be fraught with dangerous outcomes. These concerns were all voiced in one way or another by equestrians, hikers/birders and bikers at the forum on October 25, 2004. None of these groups want to share ALL the trails. However, that is what is currently occurring now and it seems to be working pretty well although noting that there are currently over 71 miles of trails to be shared versus the only 14 that are being proposed.

3. **REDUCTION IN THE SQUARE MILES OF TRAILS APPROVED AND AVAILABLE FROM OVER 71 MILES TO APPROXIMATELY 14 MILES TAKES THE PARK AWAY FROM ALL USERS:** As explained by Mr. Jachlewski from Van Dyke at the forum on October 25, the trails that will be "authorized" for use goes from total miles of close to 71 down to approximately 14 miles. This includes roads and trails, both redundant and not and both authorized and not. Several concerns (and questions) come to mind with this portion of the plan:

- **Continued Access to the area:** The Tijuana River Valley area is one of the last affordable areas for horse owners to board their horses without having to travel large distances to get to their horses (i.e. east or north county). Making this park basically unavailable to the equestrian community deprives people the opportunity of the experience of owning a horse. In a time of high fuel prices and congestion on the roads, taking this area away only will add to the current congestion. Another point to keep this area attractive to equestrians is that other equestrians from all over the County (and probably the State of California and beyond) seek this area out as an opportunity to view wildlife, enjoy scenery and ride horses on the beach.

- **Enforcement:** how will enforcement occur in an already resource-stretched area? Will areas be fenced off? (which would further degrade the enjoyment of the outdoor experience as well as have a negative impact on the wildlife migration) Will there be fines and/or tickets imposed? As was stated at the forum, the Border Patrol **must** use many of these trails which have been labeled "redundant" to enforce illegal immigrant activity. They must (and will) continue to use these trails, as will the illegal immigrants. What is the harm in leaving these trails that are going to be used anyway by Border Patrol open to equestrians, nature lovers ***and*** bikers? It would seem reasonable to assume that in some cases, the Border Patrol on motorized vehicles is doing much more harm to the environment and has a greater impact on ecological concerns than any of the other elements; be they horses or bicycles. Birds and/or animals (including reptiles) will be just as disturbed by trails created by any means – motorized vehicles, horses, bikes, even hikers. If there are areas that are this sensitive to endangered species, then they should be off limits to everyone, which is simply not practical given the geographical and governmental (i.e. Border Patrol presence) in this area. It is not fair to say that Border Patrol can go through these areas but others cannot.

4. **STRIVE FOR A BETTER BALANCE BETWEEN ECOLOGICAL CONCERNS AND RECREATIONAL USERS:** Recreational users (even equestrians and mountain biking enthusiasts) can also be concerned with and wish to protect and improve ecological concerns. As was stated at the forum, the TRVEA group regularly patrols the area, maintaining existing trails in cooperation with the Fish and Wildlife and County Parks personnel. Do any of the other groups have similarly planned activities to help maintain the existing environment? Do they participate in bi-monthly patrol of the area, pick up trash and assist park personnel by being the eyes and ears for the area? Are they able to report illegal activity? Are they actively involved in the entire community as a whole or just in preserving the area of their own enjoyment? **Everyone** who currently visits and enjoys this area also enjoys the birds and wildlife that frequent the area and you can and do view (rather than disturb) this wildlife on back of a horse. No one group should be allowed to dictate what happens in this area and any group that states that they are totally pleased with the current plan should be considered suspect. It is possible that certain groups are pleased with the current plan because it serves only their needs and uses and they realize that eventually, if this plan goes through, the other groups will become frustrated and stop using the area, leaving the entire area only for the very most of non-passive activities. This will then put additional stress and cause more over-use in other equestrian and mountain biking areas. Everyone should be willing to work together to come up with a plan that will serve all.

5. **PRESERVE THE EQUESTRIAN ACTIVITY AND/OR BUSINESSES IN THE AREA:** Equestrian activity has played an important historical role in this area for many years. Until recently, tourists were able to fulfill what I'm sure were fantasies for some of riding on the beach on the back of a horse. Unless you are a private horse owner now, that is the only way to enjoy this wonderful experience. If the plan goes through, the beach will be next. Most equestrians WANT to stay in the hard-pack sand and have no desire to disturb (or destroy) the nesting of any sensitive birds. Supervisor Cox even lamented at the closure of the last rental riding stable at the forum. Many business owners whose livelihood depends on the presence of horses and equestrian trails being in the area are in jeopardy of being shut down as a result of this plan going through. This includes farriers, veterinarians, and ranch and stable owners, feed store owners. All of this activity brings revenue into the area. Other local businesses (such as stores, restaurants, etc.) also benefit by having these businesses bring people into the area. Many people are unaware of the natural beauty of the area until they visit the area and enjoy the other historical attractions (such as the old bunkers on top of the Mesa), the Visitor's Center,

the Estuary. Flora and fauna can be enjoyed in all of its seasonal changes, the birds that flock to the ponds; it's all here but if most of the park is closed, all of these wonderful experiences will be lost, revenue to the area will suffer, and again, other areas will be over-used. We should learn by the experience at Border Field State Park – a place that is already off-limits to all but non-passive recreationists and those who want to enjoy a picnic by the sea – it isn't being used! Instead, there's a huge pile of sand and the roads are often impassable. Another project not finished another area already there for the taking that isn't being enjoyed to its fullest. It wouldn't be prudent to do what one gentleman advised: "just leave us alone and it will be all right" but the answer is somewhere in between – compromise!

In summary, we would like to request that the appropriate people go back to the drawing board and consider all of the users in this area in a fair and equitable fashion. No one group should have an "advantage" in the plan. Recreational users, ecological concerns, historical preservation and solid, sound environmental planning with a mind to solve the problems and issues currently in place in the area should be considered before simply adding to them.

Please don't force the equestrian community out of this area!! We are responsible, environmentally concerned citizens who want to protect and improve this special ecological delight as well as share it and introduce it to other outdoor enthusiasts! Forcing all of the interested groups into a small, confined and restricted environment is just asking for trouble – please, go back to the planning committee and strive for balance in the plan!

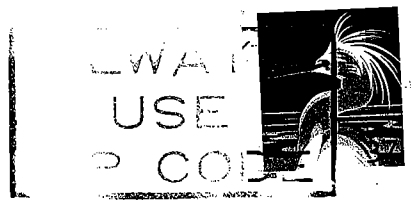
Thank you for the opportunity to provide input into this subject. We eagerly look forward to hearing about the changes in the plan that you will be able to facilitate with the additional input you have requested from those who care enough to take the time and thought to put their opinions in written format. We also look forward to the invitation to help preserve this area by participating further in the planning process.

Sincerely,

Steve Liening
Horse owner, Wigginton Ranch
4429 Del Mar Ave.
San Diego, CA 92107

Clarissa Liening
Horse owner, Wigginton Ranch
4429 Del Mar Ave.
San Diego, CA 92107

Liening
4429 Del Mar Ave.
San Diego, CA 92107



2004 NOV 3 PM 1 18

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road
San Diego, CA 92123

92123+1653

tijuana letter

10--27-04

Maeve Hanley

I have had horses in the Tijuana River Valley for the past 17 years, since 1987. It is with great dismay that I have read about the County's proposed plan for the park.

During my time in the Valley, my horses and I have traversed many miles, over many trails, from one end of the Valley to the other. Many, if not all, of these trails are on the scheduled list of trails that are to be eliminated if the proposed plan is to go forth as it is now written. One of the reasons we are given for the removal of these trails is because they are redundant. Obviously the people in charge of writing these proposals are not horse people, if they were, they would understand that part of the reason of owning and riding a horse is to feel some freedom. Freedom to feel a part of nature on the back of a living breathing animal, away from the stresses and congestion of people that seem to be so much a part of this 21 century life. I, for one, don't want to be forced upon a trail with everyone else. I prefer to renew my spirit, alone with my horse and my thoughts, on a trail of my choosing. Like I mentioned I have been in the area for 17 years, and there are people in this Valley that have been riding these trails for longer than that. Now all of a sudden bureaucrats are going to come in and tell us these trails are no more! I would have to wonder, have they even gone out to survey what it is they are actually taking away. Trails with names like "Effie May," and "Sherwood Forrest." Do they even care? I have nothing against progress, but not all progress is for the better and I think that this is one of those areas where it would be best to just leave well enough alone...

Why does everything have to be multi-use? Is that the politically correct term these days? Owning a horse, one finds that they are very limited in where they can ride as it is. That comes with the territory, and horse people accept that. Now one of the few places left where you actually HAVE some places to ride is being threatened with removal. Well that is where we must draw the line and say "NO MORE!" If it doesn't stop here then where does it stop? I foolishly thought the Tijuana River Valley was safe from development because it has always been a bit of an eyesore, from its various problems with flooding, trash, and illegals. It has now turned from the child that nobody wanted, to the belle of the ball, with various entities vying for a dance. If it weren't so very sad, this change in status would be almost comical.

In closing I would like to say that I am not naive enough to think that our voices alone will be able to staunch the tide of what is now obviously going to be a feather in someone's cap. This is a cause that I feel strongly about, and I would hope as the word gets out more people will lend their voices and their votes to join the side of the underdog. This is a cause that affects not only "horse people," it affects all people for whom preserving a way of life matters! I would also like to say that I am not by nature a selfish person, I would have no problem with sharing the proposed trail or the "yellow brick road" as it has been called. My problem begins when I think that that is the "only" trail that I would be able to choose from. Horses are not predatory animals, and as such are not perceived as threats from other species of wildlife in the area. How else could the Tijuana River Valley be home to so many endangered and threatened species of wildlife? How could this be, when horses have been going over so much of the land that they now say must be off limits? Horses don't destroy nature, it is man that is responsible for doing that! SAVE OUR TRAILS!!!!!! ALL of them.

Sincerely,

Michelle Dean

Michelle Dean
177 Ebony Ave#B
Imperial Beach, Ca. 91932
e-mail: Greystone04@cs.com

Michelle Dean
177 ebony ave #B
Imperial Beach Ca
91932

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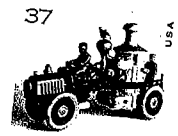

2004 NOV 1 PM 1 13

Maeva Hanley
San Diego County
of park & Recreation
5201 Ruffin Rd. Ste P
San Diego, CA. 92123

92123+1699 29

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

	e-mail address (optional)
MEL HINTON	S.D. AUDUBON SOCIETY
Name	**Organization**
1545 BUCKINGHAM DR.	858 454-6550
Street Address	**Daytime Phone No. (optional)**
LA JOLLA	CA 92037
City	**State** **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

CAREFUL CONSIDERATION SHOULD BE GIVEN TO JOINT TRAIL USE. ISSUES BETWEEN HORSES & BIKES ARE A PARTICULAR CONCERN. SHARP BLIND TURNS, NARROW SECTIONS, STEEP SLOPES, ETC. CAN BE A PROBLEM. IT MAY BE WISE TO HAVE CERTAIN TRAILS RESTRICTED — NO HORSES OR NO BIKES. HORSES CAN EASILY ERODE STEEP TRAILS.

QUIET BIRDING SITES MAY BE BETTER SERVED WITH SHORT SPUR TRAILS.

THE QUESTION OF TRAIL USE ENFORCEMENT SHOULD ADDRESSED. MAYBE A CITIZENS ADVISORY COMMITTEE SHOULD BE FORMED.

OVERALL, PRESERVATION OF WILDLIFE & HABITAT SHOULD BE THE FIRST PRIORITY.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

MTAYLOR2@COX.NET
e-mail address (optional)

MARYANNE TAYLOR
Name

TRUEA
Organization

1312 CALIFORNIA ST.
Street Address

858-688-1168
Daytime Phone No. (optional)

IMPERIAL BEACH
City

CA
State

91932
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

1. CONCERNED THAT THE ONLY TRAILS PROPOSED ARE MULTIUSE TRAILS.
2. CONCERNED THAT BICYCLISTS WILL NOT OBSERVE PROPER TRAIL ETIQUITE & HIKERS WILL NOT WANT TO SHARE THE TRAIL WITH EQUESTRIANS - HOW MANY MOTHERS DO YOU THINK WILL ALLOW THEIR CHILDREN TO USE THESE TRAILS WITH ALL OF THE POLLUTION IN THE TRV?
3. HOW WILL THE COUNTY KEEP BORDER PATROL AND ILLEGAL ACTIVITY OFF CLOSED TRAILS. (BORDER CROSSERS, OFF ROAD VEHICLES, PAINT BALLERS) WHEN THERE IS NO MONEY IN THE BUDGET FOR ENFORCEMENT. AT THE PRESENT TIME EQUESTRIANS ARE OFTEN THE "EYES & EARS" FOR LAW ENFORCEMENT.
4. EQUESTRIANS ARE THE LARGEST RECREATIONAL USER GROUP IN THE TRV. THEY DO NOT REQUIRE A LEFT HAND SURFACE TRAIL. THE CURRENT 2FT WIDE SAND TRAILS ARE ACTUALLY BETTER FOOTING FOR HORSES. EXISTING TRAILS ONLY OCCUPY 1% OF HABITAT AREA AND WHY DO YOU THINK EVERYONE WANTS TO RIDE THE SAME TRAIL EVERY DAY?
5. CONCERNED ABOUT THE LOSS OF SO MANY EXISTING TRAILS WHEN WE CURRENTLY ARE LOSING OVER 50% OF OUR TRAILS

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Please fold in thirds, staple and affix postage.

[redacted]

2004 NOV 4 PM 2 02

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

CONT- EVEN IN DROUGHT YEARS DUE TO THE FACT THAT THE RIVER IS CURRENTLY ENGINEERED TO BACK UP & FLOW INTO THE RIPARIAN HABITAT TO ENCOURAGE GROWTH TO THE HABITAT. THE FLOODING MAKES MANY EXISTING TRAILS IMPASSABLE FROM FIRST RAINFALL UNTIL JUNE OR JULY. IN RAINY/WET YEARS SOME TRAILS ARE IMPASSABLE 10 MONTHS.

6. AGRICULTURE PLAYED A BIG PART IN THE HISTORY OF THE TRV. OTHER THAN THE COMMUNITY GARDEN THERE SEEMS TO BE NO PROVISION FOR AGRICULTURE. IS THIS BECAUSE THE COUNTY PLANS TO MAKE THE ENGINEERED YEARLY FLOOD MORE WIDE SPREAD?

7. THE PLANNED BRIDGE ACROSS THE RIVER IS A GOOD IDEA, BUT IF THE RIVER IS FLOODED ~~EARTH~~ OVER ITS BANKS WITH EVERY RAIN FALL WHAT WILL YOU DO TO PROTECT THE APPROACHES TO THE BRIDGE. THERE IS CONCERN THAT THE SOIL AROUND THE APPROACHES WILL WASH AWAY EACH TIME IT RAINS. WHO WILL MAINTAIN THE APPROACHES?

8. IF BIRDING IS SUCH A BIG INTEREST & ALL OF THE TRAILS CRISS CROSSING THE HABITAT ARE CLOSED, WHO WILL EVER GET TO SEE THE BIRDS BESIDES US & CALIF FISH & WILD LIFE EMPLOYEES? NOT THE GENERAL PUBLIC WHETHER IT IS EQUESTRIANS OR BIRDERS.

9. IT IS FELT THAT THE GOAL BY THE COASTAL CONSERVANCY & US FISH & WILDLIFE HERE IS TO CLOSE OF ALL BUT PERIMITER ACCESS TO THE GENERAL PUBLIC. THIS IS OUR PARK. THE PEOPLE WHO ARE TAXPAYERS AND WHOSE HARD WORK PAYS THOSE TAXES. WE DESERVE THE RIGHT TO MORE THAN PERIMITER ACCESS TO OUR PARKS.

10. LASTLY – BUT PROBABLY MOST IMPORTANTLY – WHY IN THE WORLD IS THE GOVERNMENT – CITY, COUNTY, US, STATE. SO ANXIOUS TO SPEND ALL OF THIS MONEY (TO CREATE HABITAT & GIVE THE PUBLIC SUCH MINIMAL ACCESS) WHEN THE PROBLEM OF RAW SEWAGE SPILLS & THE ANNUAL FLOODING OF THE TIJUANA RIVER HAS NOT BEEN PROPERLY ADDRESSED. IF THERE IS ANOTHER 10 YEAR FLOOD EVENT – AND THERE WILL BE – MILLIONS OF DOLLARS WILL HAVE BEEN SPENT FOR NOTHING. IT WILL ALL BE RUINED AGAIN AS IN THE PAST BECAUSE THE RIVER IS ENGINEERED TO FLOOD.

POTENTIAL ENVIRONMENTAL EFFECTS:

Based on a preliminary assessment of potential environmental effects associated with implementation of the Proposed Project, the following issues are anticipated to be further analyzed in the EIR:

- Aesthetics / Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology / Soils
- Hydrology / Drainage / Water Quality
- Land Use and Planning
- Noise
- Public Health and Safety / Hazardous Materials
- Public Services and Utilities
- Transportation / Circulation

These issues, along with an analysis of project alternatives, cumulative impacts and potential for growth inducement, will be discussed in the EIR for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project.

PUBLIC SCOPING MEETING:

Consistent with Section 21083.9(a)(2) of CEQA, a public scoping meeting will be held to solicit comments on scope and content of the EIR. This meeting will be held on:

Monday, October 25th, 2004
Cafeteria - Southwest High School
1685 Hollister Street
San Diego, California 92154

The Public Scoping meeting agenda is as follows:

6:00 p.m. – 6:30 p.m.	Presentation on Project Description and CEQA process
6:30 p.m. – 7:30 p.m.	Public Comments at Information Stations

For additional information, please contact Maeve Hanley at 858-694-2968

2191 Hollister Street
San Diego, CA 92154

2004 NOV 4 PM 2 59

Tijuana River Valley Equestrian Association

October 28, 2004

Maeve Hanley
San Diego Department of Parks and Recreation
201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Ms. Hanley,

I am writing this heartfelt letter in hopes you will begin to understand how important the all the existing trails are to the equestrians in the Tijuana River Valley. Many horse owners in this valley and others who trailer their horses in from all areas of San Diego, along with members of our equestrian association, enjoy riding the trails in this unique environment. This coastal wetland is last little bit of rural country nestled between two of the largest cities on the west coast. TRVEA's goal, which also the goal of myself and my family, is to maintain this habitat and the trails and keeping them accessible to equestrian use.

I feel it is important to state that horses are not invasive to this environment. There has been a long history of horses and agriculture in this area, dating back to the rancho period and before. Equestrians use all existing trails, riding on the trails for the safety of themselves and their horses. There is no proof that the horse trails have a negative effect on this habitat.

As a TRVEA member, parent, and south county public school teacher, I see a great need for recreational opportunities for families. The South Bay is a working class area where there are limited recreational outlets, so affordable horse facilities and trails to ride on are needed.

Please consider my request. We are very devoted to not only keeping all the trails open to equestrian use, but continually working toward keeping this environment clean and protecting the wildlife in this valley. Thank you for your consideration in this matter.

Sincerely,

Mary Christensen

Mary Christensen
Public Relations
TRVEA

C

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT

2004 NOV 4 PM 2 59

Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

Jimsranch AOL.com
e-mail address (optional)

James Martin
Name

Martin Ranch
Organization

2140 Monument Road
Street Address

619-6620557
Daytime Phone No. (optional)

San Diego
City

Calif.
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

The New Proposed Map That Was Presented At The Last Meeting - At Southwest High School - The Horse Trails Be Proposed As A Shared Use With Bicyles & Walkers - is Not A Workable Plan. As The Horses Would make The Trails To Ruff For The Bicyles To Injoy - And The Bicyles Would Scare Most Horses That They Would Incounter - I have Been A Horse Ranch Owner IN This Valley For About 30 years And Have Been going To Meeting For Most Of Those years. The Trails That Are Beening Removed For Horse Uses Did Not Come To Be Without A Great Effort On The Part of The Horse-mens Association of The Valley. I only Hope That The governing Board will Do The Right Thing For All of Use

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Hanley, Maeve

From: Mark Kukuchek [mkukuche@nassco.com]
Sent: Thursday, November 04, 2004 2:49 PM
To: Hanley, Maeve
Cc: Cox, Greg; De La Rosa, Michael A

Maeve Hanley, M.S.

Environmental Resource Manager

Department of Parks and Recreation

5201 Ruffin Road, Suite P (MS029)

San Diego, CA 92123

Ph: (858) 694-2968

Fx: (858) 495-5841

Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK

TRAILS AND HABITAT ENHANCEMENT PROJECT

Comment Form

Email (optional) mkukuche@nassco.com

Name -Mark Kukuchek **Organization -Bonita Valley Trails/Bonita Valley horsemen**

Address -4208 Acacia Ave **phone (optional) -619-997-8799**

City -Bonita State -CA **Zip -91902**

I am an avid equestrian who has been riding and enjoying the Tiajuana River Valley Trails for many years. This is a unique area that has been well used by many equestrians from our local club the Bonita Valley Horsemen. I wholeheartedly agree with the comments submitted below:

Where are the TRAIL ENHANCEMENT parts of the project???

Keep what is already there for the horses and enhance by adding at least one 2-acre community arena with the same kind of amenities you added for the great ball fields! Build bleachers and a 2 story announcing booth like Sweetwater has so

that we can have horse shows and educational opportunities for the horse people and the community. Include several washstands, porta-potties, horse-trailer parking, regulation size arena, facilities for team-penning, water troughs, picnic tables, BBQ's and 20 corrals. Use land on the NE of Hollister & Sunset.

Add overnight horse camping with water and bathrooms and at least 12 corrals. This would bring people from all over the state! Place this at the Staging Areas

Add a Mounted Assistant Unit to regularly patrol all of the Regional Park, State & Federal parts of the park on horseback.

Add markers along the trails for reference for emergency use. Health and safety have not been addressed. Markers would help MAU report problems or get help in emergencies. (fire, shooters, paint balers, motorized vehicles, alcohol or drug use, etc.)

Facilitate the building of a Friends of TRVRP with at least one member from each of the interested, affected groups: businesses, farmers, horsemen, Mounted Assistance Unit, TRVEA, etc.

Keep all of the narrow horse trails that TRVEA has on their maps (MOU Officially Sanctioned trails) including Wycliff, Sherwood, Cathedral, Brian's Bridle, Beach Trail, South Berm and PERL Rd..

Dedicate at least 5 acres for a RENTAL STABLE for the public. Lease it for 20 years for a nominal fee. Locate it on the NE corner of Hollister and Sunset.

Guarantee horse trail connections to all horse-related business and farms and the mesas, beach, horse trails, and multi-purpose trail.

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

Lupita Jimenez
Name

e-mail address (optional)

So. Bay Greens
Organization

1134 Arbusto Corte
Street Address

Daytime Phone No. (optional)

Chula Vista, Ca
City

Ca
State

91910
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

My Comments are enclosed.

Lupita Jimenez

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Oct. 25, 2004

REMARKS – TJ River Valley & Estuary Scoping Hearing

The South Bay Greens strongly support this project overall. It falls directly within the purvue of the Third Key, one of our 10 Key Values. It is called Ecological Wisdom and states that we must maintain a balance and live within the resource limits of our communities and our planet. It further states that we must live in ways that respect the integrity of natural systems.

Having stated that, I wish to call your attention to the fact that this Valley is largely publicly owned and unsuitable for development because of flooding. Therefore visitor trails and facilities must be well planned and managed so as not to deplete the habitat value, the wildlife, and the water quality that are a major part of the attraction.

This area is considered critically important in the development of a ecotourism package that is being designed to capitalize on the areas' unique contribution to birding. San Diego is a prime locale along the famed Pacific Flyway which provides essential roosting, nesting, and wintering spots for a large number of permanent residents and migratory birds as well. A two-week period in December can provide the names and locations of unusual birds

that have been seen in the region on a daily basis. The sighting of such rare birds causes birders from all over the world to come to San Diego. There is an International Migratory Bird Day in May and an annual Bird Festival in February. The nearby Sweetwater Marsh Wetland Complex, along with the Chula Vista Nature Interpretive Center offers additional ecotourism opportunities. San Diego County is now home to more federally listed threatened and endangered species than any other county in the continental United States. Our Refuges and preserves are unique and many San Diegans understand the relationship between their high quality of life and the importance of conserving the area's natural resources. Therefore, the resource value of these gems of nature must be protected for their own intrinsic and irreplaceable value but also as a basis for the establishment of a secure ecometric system.

In your environmental study, I ask that you provide for an adequate buffer between trails and environmentally sensitive habitat areas as well as to provide for the needs of the equestrian group. Plan well for respecting the integrity of our god-given natural systems. Honor the wisdom of that ancient African proverb which states:

We do not inherit the earth from our fore-fathers, No, rather We borrow it from our children.

Lupita Jiménez
chair, So. Bay Green Party

Please fold in thirds, staple and affix postage.

Lupe M Jimenez
1134 Arbusto Corte
Chula Vista, CA 91910

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PM
26 OCT
2004

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

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TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

None
e-mail address (optional)

Lois K. Jennies
Name

TRVEA
Organization

4794 Utah St
Street Address

(619) 284-1206
Daytime Phone No. (optional)

San Diego,
City

CA
State

92116
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

We need rails on both sides of "Smugglers Bridge" for safety of horses, bikers, and hikers.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

Linda Boswell	Suncoast Farms
Name	**Organization**
1706 Tremaine Way	619-990-3451
Street Address	**Daytime Phone No. (optional)**
S.D.	CA	92154
City	**State**	**Zip Code**

e-mail address (optional)

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

1) Be sure there are plenty of hitching posts installed at stagging areas. I noticed the pole fencing proposed, and fear the fence will be used (and broken down) if inadequate "hitching" is the situation.

Generally, I think it's a great plan. I hope the park does not affect the private use of private property located within the park. ie → (over)

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Will there be any of the primitive, existing equestrian trails left in tact? It would be wonderful to have some of those trails left to "horses only". Horses are not destructive, noisy or threatening

Please fold in thirds, staple and affix postage.

AFFIX
POSTAGE

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Our ranch, "Suncoast Farms". It is a respectable facility that enhances the Tijuana River Valley. Thank you for your well-prepared meeting + information "sharing". Please know, that there are "horse interest people" that support your plan.

Hanley, Maeve

From: Lue, Askparks
Sent: Tuesday, November 02, 2004 7:26 AM
To: Linder, Cory A; Hanley, Maeve; Niez, Mary
Subject: FW: The Valley

-----Original Message-----
From: Rayfornario@cs.com [mailto:Rayfornario@cs.com]
Sent: Monday, November 01, 2004 6:03 PM
To: Lue, Askparks
Subject: The Valley

10--27-04

To whom it may concern:

I have had horses in the Tijuana River Valley for the past 17 years, since 1987. It is with great dismay that I have read about the County's proposed plan for the park.

During my time in the Valley, my horses and I have traversed many miles, over many trails, from one end of the Valley to the other. Many, if not all, of these trails are on the scheduled list of trails that are to be eliminated if the proposed plan is to go forth as it is now written. One of the reasons we are given for the removal of these trails is because they are redundant. Obviously the people in charge of writing these proposals are not horse people, if they were, they would understand that part of the reason of owning and riding a horse is to feel some freedom. Freedom to feel a part of nature on the back of a living breathing animal, away from the stresses and congestion of people that seem to be so much a part of this 21 century life. I, for one, don't want to be forced upon a trail with everyone else. I prefer to renew my spirit, alone with my horse and my thoughts, on a trail of my choosing. Like I mentioned I have been in the area for 17 years, and there are people in this Valley that have been riding these trails for longer than that. Now all of a sudden bureaucrats are going to come in and tell us these trails are no more! I would have to wonder, have they even gone out to survey what it is they are actually taking away. Trails with names like "Effie May," and "Sherwood Forrest." Do they even care? I have nothing against progress, but not all progress is for the better and I think that this is one of those areas where it would be best to just leave well enough alone...

Why does everything have to be multi-use? Is that the politically correct term these days? Owning a horse, one finds that they are very limited in where they can ride as it is. That comes with the territory, and horse people accept that. Now one of the few places left where you actually HAVE some places to ride is being threatened with removal. Well that is where we must draw the line and say "NO MORE!" If it doesn't stop here then where does it stop? I foolishly thought the Tijuana River Valley was safe from development because it has always been a bit of an eyesore, from its various problems with flooding, trash, and illegals. It has now turned from the child that nobody wanted, to the belle of the ball, with various entities vying for a dance. If it weren't so very sad, this change in status would be almost comical.

In closing I would like to say that I am not naive enough to think that our voices alone will be able to staunch the tide of what is now obviously going to be a feather in someone's cap. This is a cause that I feel strongly about, and I would hope as the word gets out more people will lend their voices and their votes to join the side of the underdog. This is a cause that affects not only "horse people," it affects all people for whom preserving a way of life matters! I would also like to say that I am not by nature a selfish person, I would have no problem with sharing the proposed trail or the "yellow brick road" as it has been called. My problem begins when I think that that is the "only" trail that I would be able to choose from. Horses are not predatory animals, and as such are not perceived as threats from other species of wildlife in the area. How else could the Tijuana River Valley be home to so many endangered and threatened species of wildlife? How could this be, when horses have been going over so much of the land that they now say must be off limits? Horses don't destroy nature, it is man that is responsible for doing that! SAVE OUR TRAILS!!!!!! ALL of them.

Sincerely,

Michelle Dean
177 Ebony Ave#B
Imperial Beach, Ca. 91932
e-mail: Greystone04@cs.com

John Gabaldon
5074 Cliffpark
San Diego 92116

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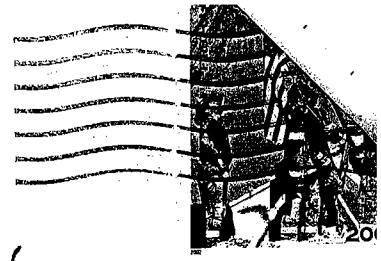


S.D. Department Park & Rec
5201 Ruffin Rd, Suite P
San Diego 92123

ATTN: M. Hanley

92123+1653

Maeve Hanley
San Diego County
Department of Parks and Recreation
5201 Ruffin Road
Suite P
San Diego, Ca, 92123

31 October, 2004

Dear Ms. Hanley;

This is a letter to specifically detail my concerns on the TRV and your EIR presentation and scoping report. The first letter I sent to you is a general discussion of the reasons for preserving the TRV as it is, with allowances for the need of the local community. That general first letter is included at the end of this letter.

You list, in the EIR presentation, four "Project Goals and Objectives":

ONE: Enhance the outdoor recreational experience for a wide variety of users.

1) San Diego County has already plenty of these types of nature trails to serve cyclists, hikers, and day-goers. How much more "enhance" do cyclists, hikers, and day-goers require?
   a) "Afoot and Afield in San Diego County" (Jerry Shad; Wilderness Press; 1986) lists 176 accessible nature opportunities for San Diego County. The few references to equestrian trails in the book are mountain areas which require horse hauling trailers and trucks--a luxury affordable by few TRV equestrians.
   b) Since 1986, more hiker, cyclist, and day-goer parks have opened, but equestrian areas have been demolished (Del Mar, Carmel Valley), and more have lost access to open land (Miramar, Fallbrook, Bonita). Even the equestrian communities of Valley Center and Ramona are now chopped up, fenced off, and restricted as developers build more.
   c) The county offers thousands of miles of streets and sidewalks for pedestrian and cycling activity. There is no reason to make the TRV another place for this type of activity.

2) The border area will remain a security complexity far into the future. A "wide variety of users" makes the area unmanageable which will result in more restriction, not less.
   a) Smugglers, illegal migrants, drifters, and criminal activity will flourish under the goal of a wide variety of users. Harassment complaints will increase as public agencies enforce safety and criminal detection over a wide variety of users.
   b) Assaults and worse are on the record for the area. None involve equestrian-related victims, only general public.
   c) The border makes this area unique for stabilization, unlike the inland parks. Immigration and criminal pressures ebb and flow through the years, making this area somewhat wild. Until the area can be fully secured to the level of other county parks, the general public should be encouraged to use only the small

enclaves established for them (Border Field State Park, general thoroughfares, and park staging areas).

d) Building wide and maintained paths invites the homeless and drifting to penetrate the TRV. Currently, difficult-footed equestrian trails, ridden by observant trail riders discourage and minimize this activity. With the general public walking, cycling, and picnicking, these homeless people will have the same (very) easy access to set up panhandling, foraging, and occupation of the valley.

3) The Tijuana River is a health problem with its solution in international politics. No plans have been funded to handle the total capacity of the problem. General public use of this area must not be allowed until public health safety issues are addressed.
   a) In 2001, while considering crossing the river on horseback, a park ranger advised me that airborne hepatitis was detected. This will occur again.
   b) Trash and animal remains unpredictably burst through the TRV from Mexico's water and sewage systems. This continues today.
   c) Equestrians educate and communicate these issues throughout the TRV with associations such as TRVEA and through boarding businesses. We have mechanisms to minimize danger. It's unreasonable to believe the general public can communicate to protect itself from these health issues.

4) A "wide variety of users" already describes the equestrian world. There are literally hundreds of equestrian sports (Horse and Rider; Draper, Sly, Muir; Annes Publishing Limited, 1999).
   a) "Enhance the outdoor recreational experience" would be best served by broadening the equestrian experience of the TRV. With broadened use, equestrian-based industries will grow many-fold to support horse-care, equipment, training, clothing, and administration related to broadened use. Furthermore, this supports San Diego's financial and social goals of diversity.
   b) California does not have a single equestrian community to provide the experience of the TRV--the opportunity to freely ride over mesas, rivers, under canopy, and in the ocean for dozens of miles in a single day. This is the last place! Expansion of equestrian activity in the TRV far better serves California than just another hiker, cyclist, or day-goer park that give this opportunity all over the state.

TWO: Restore, enhance and preserve natural habitats.

1) Restoration, enhancement, and preservation of natural habits are not defined in the EIR presentation.
   a) There are lists of animals and plants, but no outline of what actions will occur that already have not occurred or are occurring; and how these actions will better the TRV over current conditions.
   b) There is no evidence presented to support reduction of the number and distance of current equestrian trails (sanctioned and ad-hoc) because of damage by equestrian activity.
      i) There is no evidence presented of equestrian damage to the ecosystem in the TRV. There is plenty of evidence of general public damage to San Diego's

parks and beaches. See the SD Union Tribune's article on the July Fourth trashy aftermath, this year.

c) Furthermore, no evidence is presented that says why the TRV must bear an increased load of preservation and restoration. The present load is commendable and tenable.

THREE: Improve public access to the coast, regional and State trail systems.

1) In your map proposal, only the east-to-west proposed trails—and only along the northern-most links--address this laudable goal.
   a) All proposed new trails south of this northern path do not enhance or add to public access to the coast, regional or state trail systems. Most are loops.
   b) The health, safety, and security of the general public can be sustained by building only this northern link and staging and picnic area.
   c) Border Field State Park already fulfils an access to mesa, coastal, and Mexico use.
   d) The South Bay Coastal and Marshland park already fulfils access to coastal natural habitats.
   e) Naval base security can be maintained at present funding and levels by turning the proposed path northward when the path reaches the eastern end of the base, and directing the path into already secured and maintained city streets.

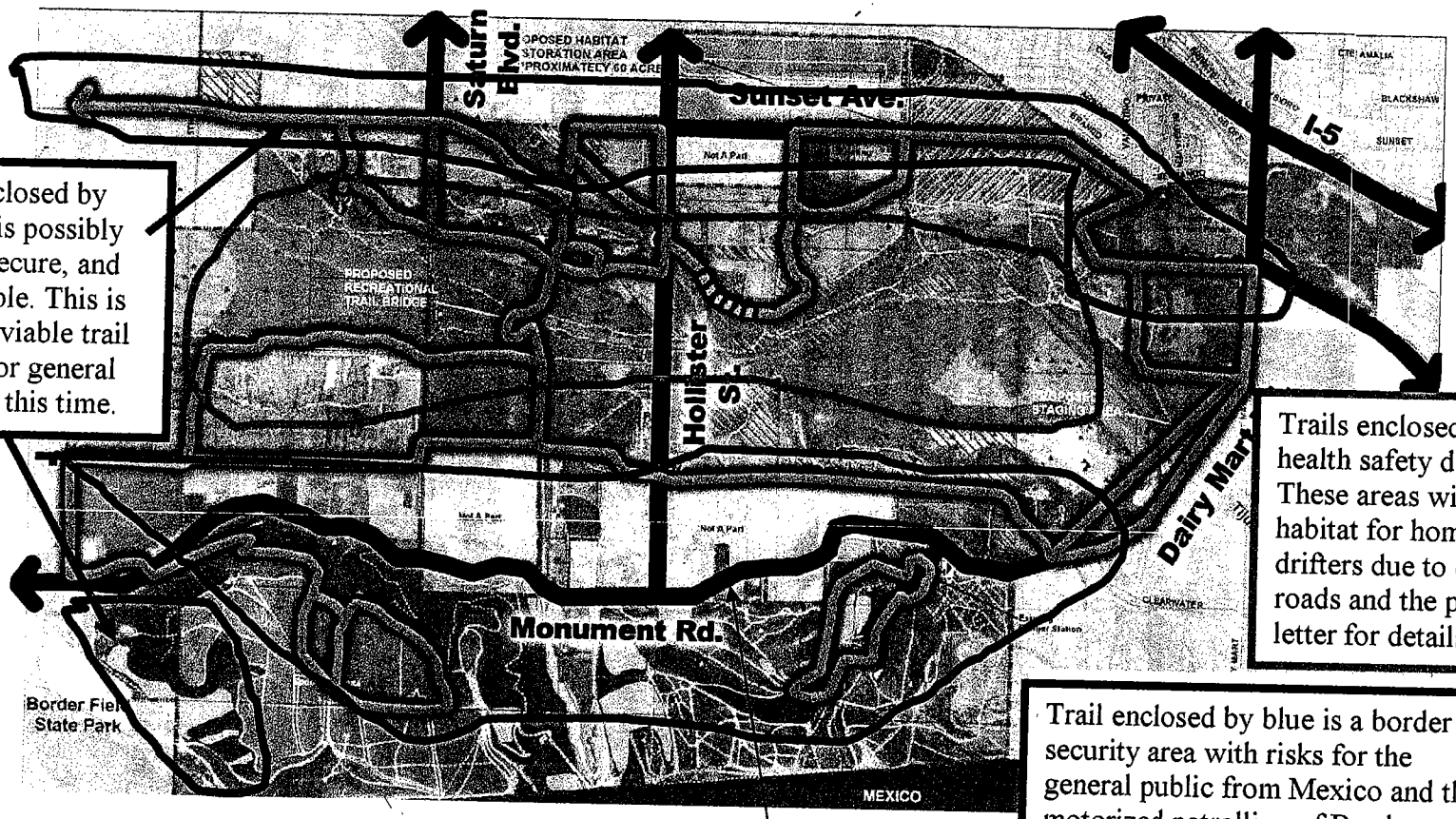
FOUR: Plan future park land use.

1) I was unable to find a plan for the future of park land in the EIR presentation.
   a) The health, safety, security of the border areas are far from being understood. There is no mention of these issues in the EIR.
   b) To plan for the future requires an understanding of these issues. It's simply too early to make a future plan. The equestrian and agricultural uses have withstood over a century of changes in environment, development, and border issues. This inertia can and should continue until the City of San Diego and the County of San Diego can define the most serious issues and make their corrections. Until then, the citizens of the TRV and the businesses operating there are demonstrating good stewardship until and if a "better" use is found.

Best regards,

John Gabaldon

John Gabaldon
5074 Cliff Place
San Diego, California 92116



Trail enclosed by red line is possibly viable, secure, and sustainable. This is the only viable trail or area for general public at this time.

Trails enclosed by green are health safety danger areas. These areas will easily become habitat for homeless and drifters due to easy access to roads and the public. See the letter for details.

Trail enclosed by blue is a border security area with risks for the general public from Mexico and the motorized patrolling of Border Patrol. Nearby road and trail erosion will eliminate use of trail in wet seasons. Illegal parking will become an issue. Increased fencing will occur by city and farmers.

A six foot wide trail cannot be utilized by emergency first-responders. The access being touted for the general public so close to a major city will encourage many unprepared users to attempt this remote area.

Trail development along entire length of Monument, Hollister, and Dairy Mart will cost less, be sustainable, offer a similar hiking & cycling experience, and minimize health, safety, and security problems.

For nine years I have ridden throughout the TRV spending at least 25 hours a month on the trails. The TRV represents one of the last wild areas in any of California's major and minor cities, and as such must retain its originality for our access to nature in the midst of large cities.

The EIR Scoping report is a start at identifying the best use of the TRV. In the context of use for the local community the project offers a new recreational outlet for the neighborhood. In the context of the county and the state, the project doesn't reach far enough for the needs of the future.

San Diego and its minor cities offer many trails set in natural environments that restrict use to only bicyclists and hikers—Sorrento Canyon, the east mountains, Lake Murray, the county's reservoirs, and the state beaches. There are many places to hike, jog, or bicycle that are accessible and natural. However, a natural and accessible area predominantly for equestrians is rare, and in our county—fast becoming extinct. The TRV is now the only area where equestrians ride with only rare encounters with bicyclists, hikers, or fences. Del Mar, Bonita, and East and North County areas are now developed and have confined equestrians to chopped up, non-contiguous portions of land. The Los Angeles area has degraded even further. This makes the TRV a unique and precious resource for the entire state—a place where equestrian trail sports have a hundred miles to ride in a protected natural environment, and unbroken by fences, pedestrian antics, and onerous environmental rules. The opportunity to freely ride over mesas, rivers, under canopy, and in the ocean for dozens of miles in a single day can not be matched anywhere in California. This is the last place!

This isn't Bonita Road or Bonita Golf Course's level of secure walking-path activity. The area is somewhat wild as evidenced by Border Patrol in commando garb, drifters living in deep brush, and the Tijuana River unleashing pent up trash and unpredictable water. For at least another generation, the border will be a security problem. The proposed trails, especially the southern trail portion in the EIR report, will not be used by cyclists, joggers and families, especially after dark. The southern proposed trails must be left out of the plan for a developed pathway, and left to natural trails that form, die out, and re form as the trail riders, seasons, weather, and years act on them.

The northern proposed trails have the capacity for serving the local community's small population who need developed footpaths to enjoy the area where they live. The link up to the California Coastal Trail will add enough distance for serious cycling and hiking enthusiasts. Leave the area south of the river as primarily equestrian--and develop use by equestrian enthusiasts throughout the county and state.

In summary:

Scope-down development to areas that will get certain use.

Stay well north of the river for a developed trail.

Make the north trails triple use for cyclists, pedestrians, and equestrians.

Preserve and encourage activity that already flourishes—equestrian trail sports.

Please don't trivialize this resource by converting it into something that's present in thousands of places all over our state. This is unique. It's precious. It deserves to be here in the same condition, the same use, far beyond our flicker of time alive.

Best regards,

John Gabaldon
5074 Cliff Place
San Diego, California 92116

LA CIMA INTERNATIONAL SHOW HORSES
2454 MONUMENT ROAD
SAN DIEGO,CALIFORNIA -92154
ph:619-690-3665
Oct 29,2004

Maeve Hanley/San Diego Department of Parks and Recreation
201 Ruffin Rd. Suite P
San Diego,Ca. 92123
Fax: 858-495-5841

SUBJECT:6 FT (six) WIDTH OF TRAILS AT TIJUANA RIVER VALLEY PARK IS VERY NARROW FOR AMBULANCES IN CASE OF MEDICAL EMERGENCY CONTINGENCY OF HIKERS,CYCLIST,EQUESTRIAN :16 (sixteen) ft. width suggested for trails. LANDING SPOTS FOR HELICOPTER LIFE FLIGHT.

Dear Ms. Hanley,
Congratulations to the San Diego Department of Parks and Recreations on the accomplishments of the project of the Tijuana River Valley Park and its tentative beginning of operation on 2005.

Kindly consider that a 6 ft width of trails is not enough for access of ambulances in case of emergency contingency of visitors using the trails of the park,also is not enough space for a hickers,cyclist and equestrian on horse-back moving at the same time.Also have in mind the need of at least two landing spots for helicopter in the event of life flight emergency.

La Cima equestrian members is an independent conviviality group and our spirit is to have a friendly and supportive relationship with the county of San Diego , State of California authorities and fellow citizens for the common goal of establishing an excellent recreation facilty at Tijuana River Valley Regional Park.Best wishes,

J.A. Murga
Dr. Jorge A. Murga
Veterinarian

By J.A. Murga
Conrad Noriega
Head horse trainer.

C:Alejandro de la Vega.La Cima CEO.

LA CLIPPER SHOW HOMES
2454 MORENO RD
SAN DIEGO, CA
92154

SAN DIEGO DEP. PARKS / RECREATION
MAEVE HANLEY
201 RUFFIN ROAD SUITE P
SAN DIEGO, CA
92123

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LA CIMA INTERNATIONAL SHOW HORSES
2454 MONUMENT ROAD
SAN DIEGO,CALIFORNIA -92154
ph:619-690-3665
Oct 29,2004

Maeve Hanley/San Diego Department of Parks and Recreation
201 Ruffin Rd. Suite P
San Diego,Ca. 92123
Fax: 858-495-5138

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C:Alejandro de la Vega.La Cima CEO.

VIRGINIA TYNAN
CO-OWNER
KIMZEY RANCH
2810 HOLLISTER STREET
SAN DIEGO, CA 92154
619 428-2214
RANCHGIRL9@AOL.COM

2004 NOV 4 PM 2 59

November 2, 2004

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Subject: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project:

Thank you for considering the comments of a fourth generation San Diegen.

Comments

I. There have been horses in this valley since 1769 and it is not the responsibility of the Equestrian Community to justify the existing trails. The base document must include all the approved (MOU) trails.

II. I strongly object to the basic assumption that trails are a negative element for wildlife. The Least Bells Vireo has thrived and grown in large numbers **choosing** to nest along side the trails. I believe closing the trails will have a negative affect on certain species, most certainly their safety, and the open space the trail provides to forage for food and easily view their enemies. Closing the trails will also drastically change the Vireo's food supply. Man, horse and wildlife have been getting along together just fine in this Valley for two hundred years, now special interest groups, with limitless funds and political power, want to fix something that **is not broken.**

III. It is positively essential the Border Patrol have access to every inch of this valley. Before Gate Keeper and the funding for more border patrol personal, illegals used to run through our ranch by the dozens on their way north leaving behind trash, clothing, and shoes and sometimes in the winter their life. We live in a very different world today; protection of **humanity** is foremost and essential. If you take away **any access** for the Border Patrol, you put us **all** at risk from illegal aliens, **terrorists**, increase in crime and the negative impact on wildlife by their constant presence. I have seen the number of birds in the valley increase by the **thousands** since Gate Keeper was implemented.

IV. How many miles of bicycle trails versus equestrian trails in California? Please let us keep the small amount of trails left in California for horses and foot traffic only. The soil is very sandy and not conducive for bicycle travel.

Proper soil would have to be laid and maintained on the trails for bicycle travel and that would be very disruptive to wildlife and the cost would be prohibitive. North to South bicycle trails perhaps, along Hollister Street to complete the trail to the border of Mexico, but no east to west traffic.

V. Yes, you need to protect all the wildlife, but you also have a duty to protect the equestrian's trail life and rights to use public lands earmarked for passive recreation.

VI. The Tijuana Valley Water District's Million plus dollars should be spent by Parks and Recreation in the way it was intended to be, **on active and passive recreation** for the people.

VII. For generations my native family, pioneers who came across in a covered wagon, has known the value of parks and recreation for our beautiful city. My great grandfather Frank Flynn donated the land where Flynn Springs Park now stands.

The Tijuana River Valley is unique in proving man, horse, and wildlife can co-habituate.

Virginia Tynan
Co-Owner
Kimzey Ranch

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

e-mail address (optional)

Katrina Schechter age 14
Name

Organization

684 Seacoast Dr
Street Address

Daytime Phone No. (optional)

Imperial Beach
City

CA
State

91932
Zip Code

2004 NOV 1 AM 10 06

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Horseback riding on the narrow natural equestrian trails is something I do with my dad. We do not harm nature. Horseback riding is an activity we do together. Not his as a coach, of a spectator cheering me on, but as a fellow horseman. Please keep as many Trails open as possible. I think it's a very bad idea to make the trails multiuse. I was hurt once when a Jogger Scared my horse and I fell off. I especially enjoy riding to the beach and on the mesa.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

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PLEASE PRINT

klbalex@aol.com
e-mail address (optional)

Karen Bilbray
Name

Organization

1307 9th St
Street Address

619-992-7478
Daytime Phone No. (optional)

Imperial Beach
City

CA
State

91932
Zip Code

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The project description makes an inappropriate assumption that existing use patterns have been detrimental to habitat and species management and has caused declining recreational user experience in the TRVRP. With the stated assumption of minimal new trails and trail linkages, it is assumed to be beneficial to biological and recreational resources. The project description totally ignores that the historical facts in the TRVRP are that habitat expansion with increased endangered species proliferation and equestrian activity have progressed over the last two decades.

The project description also ignores the fact that, as presently used, including all recreational activities such as equestrian, have resulted in the TRVRP being one of the most productive areas in the entire Southern California area. It is second only to Camp Pendleton in the propagation of the endangered Least Bells Vireo. The Least Bells Vireo survey conducted by project proponents shows the highest concentration of successful nesting pairs to be directly adjacent to active horse trails. Though some may debate the reason for this historical pattern (Least Bells Vireo preferring horse trails for their nesting areas) the fact is that in such a successful area no changes should be made such as removing historical trails and uses without first proving through extensive study that such removal may not be detrimental to successful breeding of the endangered species. Empirical evidence indicates that the assumption that all human and equestrian activity is detrimental to the species' successful reproduction is wrong and dangerous.

The assumption for over 30 years has been that when considering impacts or possible impacts to endangered species the NO Project or NO net change has always been the preferred option. The project proponents bear the burden of proof like any other developer that their project will not adversely impact endangered species, coastal access, or coastal-dependent agriculture.

The Department of Fish and Wildlife and the Department of the Interior recognized the fact that inclusion of equestrian trails was essential to the preservation of wildlife when developing the Otay Wilderness area. Neither animals nor birds are bothered by man on horseback, but they are of man on foot. The pedestrians, bird watchers, and illegal aliens may prove to be much more detrimental to the propagation of the species than anything else. Don't create another "No man's Land" with no enforcement.

History shows compatible use. There is no reason whatsoever for change.

1307 6th St
Imp. Bch, CA 92032

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Ms Maeve Hanley
San Diego Department of
Parks and Recreation
5201 Ruffin Road Ste P
San Diego, CA 92123

92123+1653

Nov 1, 2004

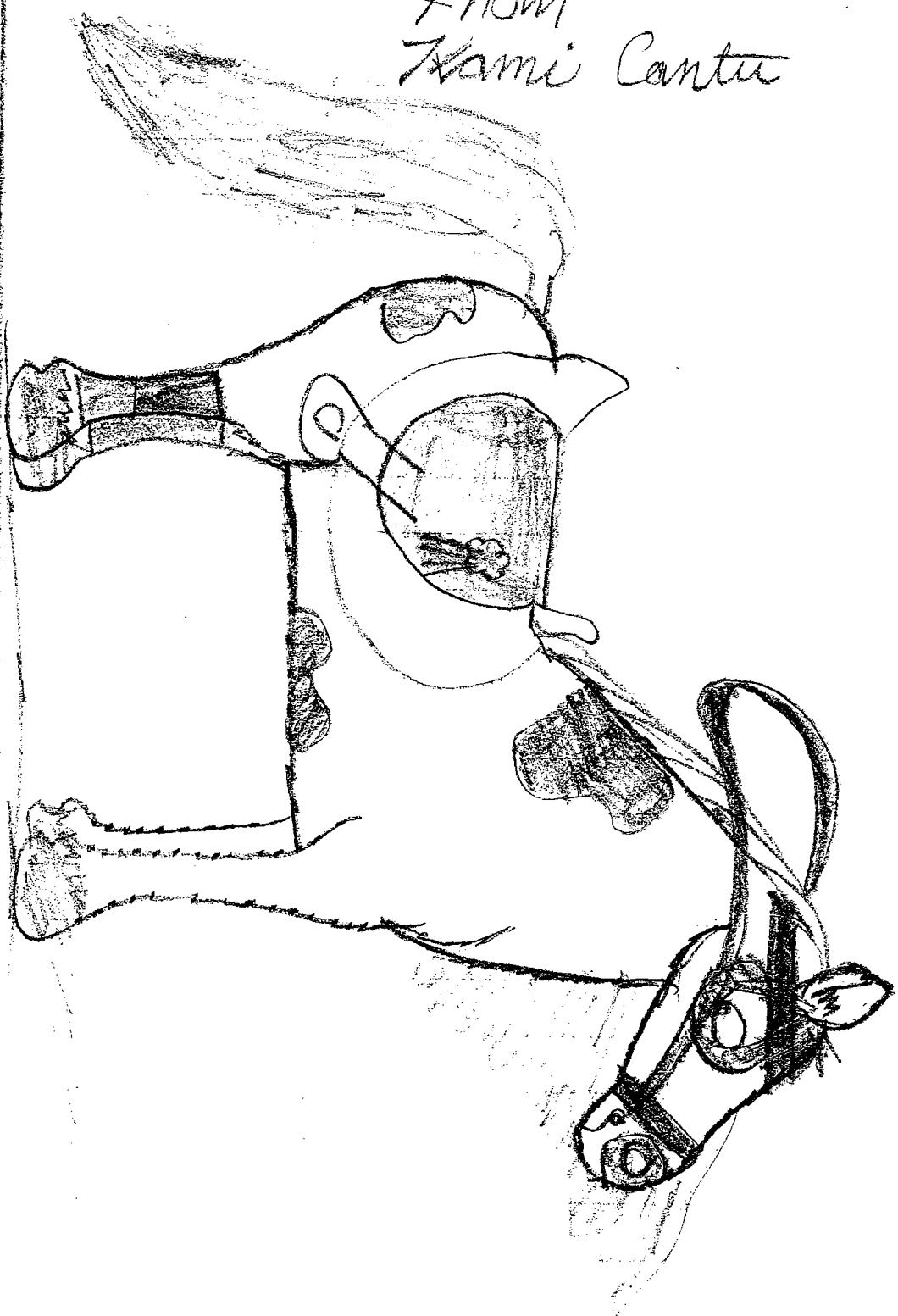
2004 NOV 4 PM 2 59

Dear Parks and Recreation People,

A Gray little bunny running into a bush. Now can you see that at your house? My name is Kami Cantu I im in 5th grade and I'm writing this letter to tell to not to close all the trails. I'm Historian at my school and I belive in the democratic process. I know you will listen to me and my letter adout not closing the trails. I love in the spring the wild yellow and orange flowers touching my feet, Or looking at the duck pond. Watching the birds spred there wings and fly, especially from the back of my horse.

In closing, my letter, I ask
you nicely not to close
the trails.

From
Kami Cantu



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PLEASE PRINT

Juana R Perez
Name

e-mail address (optional)

Coral Gate Neighbor
Organization

3096 Otay Dr.
Street Address

Daytime Phone No. (optional)

San Ysidro, CA 92173
City **State** **Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

I would like to know if this project is accepted and completed How would people who live in Coral gate be affected or beneficiated from it.

How are you going to handle homeless people living in this area and pollution?

How are you going to handle surge from Tijuana?

How is the maintenance going to be kept. Who is going to do what.

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Fax 858-495-5138 (or mail, see over)

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San Diego County
Department of Parks and Recreation
5201 Ruffin Road
Suite P
San Diego, Ca, 92123

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Stay well north of the river for a developed trail.

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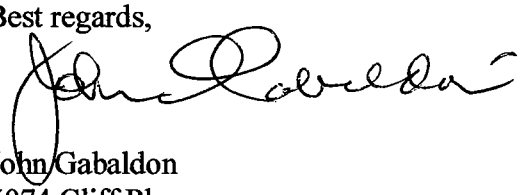

John Gabaldon
5074 Cliff Place
San Diego, California 92116

GAGALDON
5074 CLIFF PL
SAN DIEGO 92116

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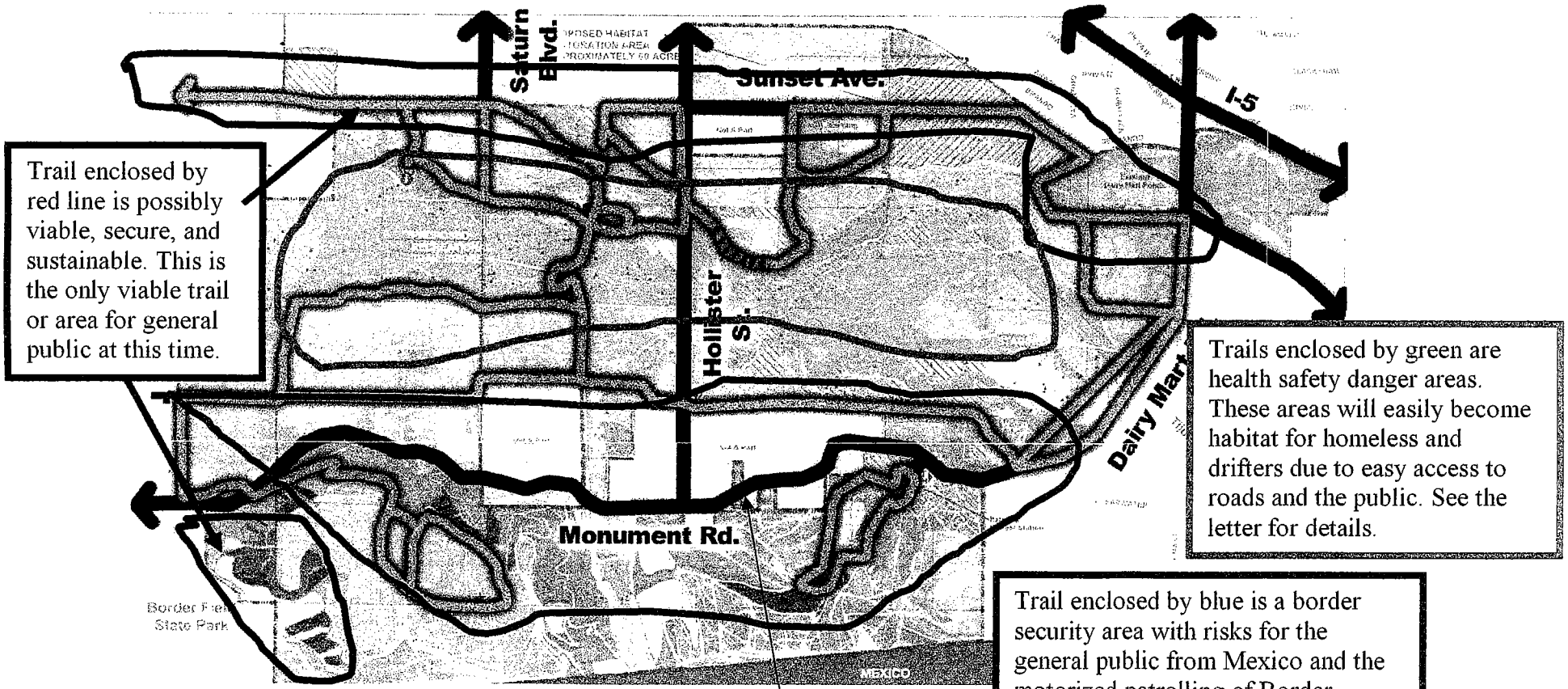
Maeve Hanley
SAN DIEGO COUNTY DEPARTMENT PARKS & REC
5201 RUFFIN RD.
SUITE P
SAN DIEGO



Trail enclosed by red line is possibly viable, secure, and sustainable. This is the only viable trail or area for general public at this time.

Trails enclosed by green are health safety danger areas. These areas will easily become habitat for homeless and drifters due to easy access to roads and the public. See the letter for details.

Trail enclosed by blue is a border security area with risks for the general public from Mexico and the motorized patrolling of Border Patrol. Nearby road and trail erosion will eliminate use of trail in wet seasons. Illegal parking will become an issue. Increased fencing will occur by city and farmers.

A six foot wide trail cannot be utilized by emergency first-responders. The access being touted for the general public so close to a major city will encourage many unprepared users to attempt this remote area.

Trail development along entire length of Monument, Hollister, and Dairy Mart will cost less, be sustainable, offer a similar hiking & cycling experience, and minimize health, safety, and security problems.

31 October, 2004

Maeve Hanley
San Diego County
Department of Parks and Recreation
5201 Ruffin Road
Suite P
San Diego, Ca, 92123

Dear Ms. Hanley;

This is a letter to specifically detail my concerns on the TRV and your EIR presentation and scoping report. The first letter I sent to you is a general discussion of the reasons for preserving the TRV as it is, with allowances for the need of the local community. That general first letter is included at the end of this letter.

You list, in the EIR presentation, four "Project Goals and Objectives":

ONE: Enhance the outdoor recreational experience for a wide variety of users.

1) San Diego County has already plenty of these types of nature trails to serve cyclists, hikers, and day-goers. How much more "enhance" do cyclists, hikers, and day-goers require?
   a) "Afoot and Afield in San Diego County" (Jerry Shad; Wilderness Press; 1986) lists 176 accessible nature opportunities for San Diego County. The few references to equestrian trails in the book are mountain areas which require horse hauling trailers and trucks--a luxury affordable by few TRV equestrians.
   b) Since 1986, more hiker, cyclist, and day-goer parks have opened, but equestrian areas have been demolished (Del Mar, Carmel Valley), and more have lost access to open land (Miramar, Fallbrook, Bonita). Even the equestrian communities of Valley Center and Ramona are now chopped up, fenced off, and restricted as developers build more.
   c) The county offers thousands of miles of streets and sidewalks for pedestrian and cycling activity. There is no reason to make the TRV another place for this type of activity.

2) The border area will remain a security complexity far into the future. A "wide variety of users" makes the area unmanageable which will result in more restriction, not less.
   a) Smugglers, illegal migrants, drifters, and criminal activity will flourish under the goal of a wide variety of users. Harassment complaints will increase as public agencies enforce safety and criminal detection over a wide variety of users.
   b) Assaults and worse are on the record for the area. None involve equestrian-related victims, only general public.
   c) The border makes this area unique for stabilization, unlike the inland parks. Immigration and criminal pressures ebb and flow through the years, making this area somewhat wild. Until the area can be fully secured to the level of other county parks, the general public should be encouraged to use only the small

enclaves established for them (Border Field State Park, general thoroughfares, and park staging areas).

d) Building wide and maintained paths invites the homeless and drifting to penetrate the TRV. Currently, difficult-footed equestrian trails, ridden by observant trail riders discourage and minimize this activity. With the general public walking, cycling, and picnicking, these homeless people will have the same (very) easy access to set up panhandling, foraging, and occupation of the valley.

3) The Tijuana River is a health problem with its solution in international politics. No plans have been funded to handle the total capacity of the problem. General public use of this area must not be allowed until public health safety issues are addressed.
   a) In 2001, while considering crossing the river on horseback, a park ranger advised me that airborne hepatitis was detected. This will occur again.
   b) Trash and animal remains unpredictably burst through the TRV from Mexico's water and sewage systems. This continues today.
   c) Equestrians educate and communicate these issues throughout the TRV with associations such as TRVEA and through boarding businesses. We have mechanisms to minimize danger. It's unreasonable to believe the general public can communicate to protect itself from these health issues.

4) A "wide variety of users" already describes the equestrian world. There are literally hundreds of equestrian sports (Horse and Rider; Draper, Sly, Muir; Annes Publishing Limited, 1999).
   a) "Enhance the outdoor recreational experience" would be best served by broadening the equestrian experience of the TRV. With broadened use, equestrian-based industries will grow many-fold to support horse-care, equipment, training, clothing, and administration related to broadened use. Furthermore, this supports San Diego's financial and social goals of diversity.
   b) California does not have a single equestrian community to provide the experience of the TRV--the opportunity to freely ride over mesas, rivers, under canopy, and in the ocean for dozens of miles in a single day. This is the last place! Expansion of equestrian activity in the TRV far better serves California than just another hiker, cyclist, or day-goer park that give this opportunity all over the state.

TWO: Restore, enhance and preserve natural habitats.

1) Restoration, enhancement, and preservation of natural habits are not defined in the EIR presentation.
   a) There are lists of animals and plants, but no outline of what actions will occur that already have not occurred or are occurring; and how these actions will better the TRV over current conditions.
   b) There is no evidence presented to support reduction of the number and distance of current equestrian trails (sanctioned and ad-hoc) because of damage by equestrian activity.
      i) There is no evidence presented of equestrian damage to the ecosystem in the TRV. There is plenty of evidence of general public damage to San Diego's

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The EIR Scoping report is a start at identifying the best use of the TRV. In the context of use for the local community the project offers a new recreational outlet for the neighborhood. In the context of the county and the state, the project doesn't reach far enough for the needs of the future.

San Diego and its minor cities offer many trails set in natural environments that restrict use to only bicyclists and hikers—Sorrento Canyon, the east mountains, Lake Murray, the county's reservoirs, and the state beaches. There are many places to hike, jog, or bicycle that are accessible and natural. However, a natural and accessible area predominantly for equestrians is rare, and in our county—fast becoming extinct. The TRV is now the only area where equestrians ride with only rare encounters with bicyclists, hikers, or fences. Del Mar, Bonita, and East and North County areas are now developed and have confined equestrians to chopped up, non-contiguous portions of land. The Los Angeles area has degraded even further. This makes the TRV a unique and precious resource for the entire state—a place where equestrian trail sports have a hundred miles to ride in a protected natural environment, and unbroken by fences, pedestrian antics, and onerous environmental rules. The opportunity to freely ride over mesas, rivers, under canopy, and in the ocean for dozens of miles in a single day can not be matched anywhere in California. This is the last place!

This isn't Bonita Road or Bonita Golf Course's level of secure walking-path activity. The area is somewhat wild as evidenced by Border Patrol in commando garb, drifters living in deep brush, and the Tijuana River unleashing pent up trash and unpredictable water. For at least another generation, the border will be a security problem. The proposed trails, especially the southern trail portion in the EIR report, will not be used by cyclists, joggers and families, especially after dark. The southern proposed trails must be left out of the plan for a developed pathway, and left to natural trails that form, die out, and re form as the trail riders, seasons, weather, and years act on them.

The northern proposed trails have the capacity for serving the local community's small population who need developed footpaths to enjoy the area where they live. The link up to the California Coastal Trail will add enough distance for serious cycling and hiking enthusiasts. Leave the area south of the river as primarily equestrian--and develop use by equestrian enthusiasts throughout the county and state.

In summary:

Scope-down development to areas that will get certain use.

Stay well north of the river for a developed trail.

Make the north trails triple use for cyclists, pedestrians, and equestrians.

Preserve and encourage activity that already flourishes—equestrian trail sports.

Please don't trivialize this resource by converting it into something that's present in thousands of places all over our state. This is unique. It's precious. It deserves to be here in the same condition, the same use, far beyond our flicker of time alive.

Best regards,

John Gabaldon
5074 Cliff Place
San Diego, California 92116

October 27, 2004

Maeve Hanley
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Re: Trails and Habitat Enhancement Project, Tijuana River Valley Regional Park

Dear Ms. Hanley,

On the issue of the Trails and Habitat Enhancement Project, I support plans that are geared towards habitat improvements that primarily benefit the indigenous plants and animals.

Human recreational uses must be considered secondary – it's the health of this ecosystem that draws the people to this place, and we are the guests. All efforts must be made to ensure that our presence does not overly impact and degrade this important habitat.

Thank you for taking this perspective into consideration.

Laura Emerick
2820 Grape St.
San Diego, CA 92102

Dirk Dawson
Laura Emerick
2820 Grape St.
San Diego, CA 92102-1130

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Ms. Maeve Hanley
SD County Dept. of Parks + Recreation
5201 Ruffin Rd., Ste. P
San Diego, CA 92123

92123+1653

Tijuana River National Estuarine Research Reserve
California Department of Parks and Recreation
301 Caspian Way • Imperial Beach • CA • 91932
(619) 575-3613 • Fax (619) 575-6913 • www.tijuanaestuary.com

November 2, 2004

Greg Abbott
Assistant State Park Resource Ecologist

Meave Hanley
Environmental Resource Manager
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego CA 92123

2004 NOV 4 PM 3 45

Comments on the Tijuana River Valleys Regional Parks Trail Plan

The Tijuana River National Estuarine Research Reserve (TRNERR) appreciates the opportunity to comment on the county parks trail plan. We feel that the trail system in the County and State Parks needs improvement to enhance resource protection, visitor safety, and public access.

TRNERR feels that all improvement and developments should be limited to areas already heavily impacted. There are numerous trails, roads and pathways already on county parkland and the reserve and to create another new trail only leads to increased fragmentation of habitat with damaging impact on many birds, small reptiles and insects. The comments at the scoping meeting mostly concerned least Bell's vireo however the habitat requirements of southwestern willow flycatcher's needs to be addressed. Other comments are mentioned below.

- The biological problems caused by habitat fragmentation needs to be communicated to the public. The public feels that 71 miles of dirt roads and path in an area of less then 10 square miles is acceptable. Whereas 10 miles of trails in a ten mile square area significantly impacts wildlife. You only need to look at the dead snakes on the roads and trail in the springtime to understand trails impact on wildlife. The public does not seem to understand that roads and path negatively impact many small reptiles, mammals and insects.

- When describing the length of the trail system, the length of existing paved roads in the valley should be noted.

- Maps of the trail system should show the designated trails within the Tijuana River National Research Reserve so that people viewing the maps can get a better understanding of the trail system in the whole valley.

- The two trails across the Disney Property excessively fragment the flood plain. Two multipurpose roads only ¼ mile apart seem redundant. If the northern tail was a narrow horse trail it would help minimize impact.

- The main street bicycle access to Border Field and the ocean is down Monument Road. Currently Monument Road is a narrow, twisting, dangerous road. The roadbed is wide but it is mostly overgrown. Most people visiting the area for the first time go down Monument Road, and they will continue to do so in the future because it is the route delineated on maps and signage. The new trail plan does not improve bicycle safety on this important access route. The best way to improve street bike access to the parks would be to put a paved bicycle path adjacent to Monument Road. The bicycle path would meet the new road and trail at Border Field and provide a safer route to the Border Monument and ocean.

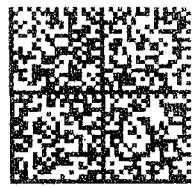
- One of the reason equestrian's feel they need so many trails is because the river valley is an island without a wildlife corridor or equestrians corridor connecting to the Otay Valley Park lands. The low areas that form the drainage that meanders by the drive-in theater and behind Southwest High school should be identified as a possible multipurpose corridor. This corridor is the flood plain of the Tijuana River when it overflows it banks and flows into San Diego Bay.

- The annual cost of maintaining these trails should be estimated.

Thank you,

Greg Abbott

TIJUANA ESTUARY
VISITOR CENTER
301 Caspian Way
Imperial Beach, CA 91932



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Maeve Hanley
Environmental Resource Manager
San Diego County Parks
5201 Ruffin Rd. Suite 'P'
San Diego CA
92123

Trail Comments

JCG
5074 Cliff Pl.
S.D. 92116

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M. Hanley.
San Diego Parks & Rec Department
5201 Ruffin Rd
Suite P
San Diego, CA 92123

Dear Ms Hanley,

October 31, 2004

This is in regards to the redevelopment of the TRV as proposed by your EIR presentation.

As an avid equestrian rider in the valley for nine years, I have first-hand experience as to the complexities that face your proposed redevelopment plan. As an Economics Professor at USD, my expertise compelled me to evaluate your EIR presentation from a cost vs. benefit perspective, and assess the probability of success of your course of action. On a cost basis, your redevelopment project has multi-million dollar ramifications with substantial yearly recurring costs as you attempt to urbanize what is undeniably a riverbed.

The rivers, despite bulldozers attempting to clear and widen their paths, have relentlessly flooded causing trails to continually change and reroute as defined by the low-land environmental conditions. This would include all the EIR's proposed trail links, loops, and locations, with possibly the exception of the most northern proposed trails. (Even the mesa loop receives major erosion and mountainside collapse.) As equestrian riders, downed trees, deep-mud conditions, or paths flooded for miles are not deterrents to our sport. But for hiking or bike trails, the county will need to budget full-time trail maintenance in order to accommodate other than equestrian needs. Currently, equestrian riders voluntarily maintain the trails, especially after storms, at no cost to taxpayers.

Besides the evolving environmental conditions inherent to the area, your greatest cash-hemorrhage will be spent on the hot-bed of cross-border issues we inherit from Mexico. Rodriquez Dam overflows and floods the TRV. Heavy rains not only pollute the area with a barrage of tires, refrigerators, shoes, plastic containers, and general trash, but also bring with it disease. Four years ago, the rangers warned equestrian riders not to cross the river due to its contamination with airborne Hepatitis C. This alert went on for months! In the face of such serious contamination, the legal costs and moral obligations of opening this parkway to unsuspecting pedestrians and their children are staggering. Redevelopment necessitates a deep-pocket budget for this continued haz-mat clean-up because all previous negotiations have not dissuaded Mexico from dumping trash, chemicals, and raw sewage into the rivers. I did not find this addressed in the EIR presentation. The cost to benefit has well been studied for water and sewage management of the TRV, and funded to the extent of that benefit. It did not include use as a populous general public area.

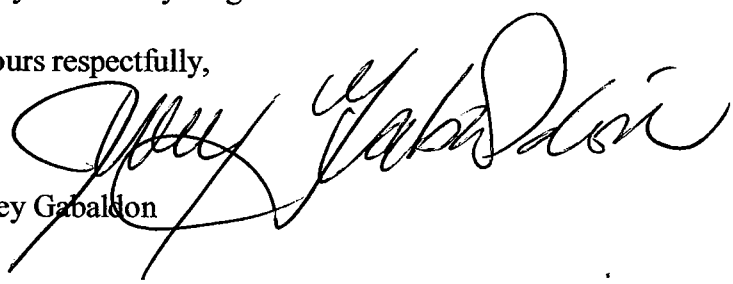
I look at the benefits of your redevelopment plan. I would love the opportunity to share the TRV with all San Diegans and those that visit the area—but, in the scope of what we have now—that truly unique experience of the only equestrian beach in Southern California that's directly coupled to nearly a hundred miles of environmentally rich trails. This in itself is a social and financial benefit for the county—why not promote this uniqueness to bring in a populous niche interest and their finances to preserve the area for everyone while privately staying solvent over the long haul? In your EIR presentation, I could not find a financial or environmental addressing of the short and long-haul cost-

benefit that are unique either to the TRV by remaining a farming and equestrian community, versus becoming a general public park.

Progress (by the voices of builders creating subdivisions) has year-by-year eradicated the equestrian trails offered throughout the county. Living in a large metropolitan city and still being able to enjoy the rural riding conditions inherent to remote areas is such a jewel it must be treasured and preserved. Destroying something truly unique that instead San Diego should be boosting, and by spending millions of dollars to create something that currently exists in over 200 locations in San Diego County, is not a financially sound or progressively thought-out redevelopment project.

Why must everything be made to be the same?

Yours respectfully,



Joey Gabaldon

Trail Head west end of monument

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

Jim Peugh	peugh@cox.net
Name	**e-mail address (optional)**
Jim Peugh	S.D. Audubon
Name	**Organization**
2776 N. poma St	619-224-4591
Street Address	**Daytime Phone No. (optional)**
San Diego	CA	92106
City	**State**	**Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

The project needs a build in system for monitoring the impacts of recreational use. Based on that the project should include active management to keep the recreational use sustainable. This is the only way to assure that environmental impacts can be minimized. We urge that the EIR require such a system.

The western trail head on Monument Road will mainly have impacts on Border Field State Park and the NWR. We urge that the EIR assess those impacts. Identify alternatives to eliminate those impacts

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

over

There are 71 miles of trails in the valley. mostly unplanned. We urge that the EIR analyze the cumulative impact of planned use in conjunction with all of the human use of the valley.

The EIR should evaluate the impacts of "trails in the wetter areas of the valley including increases in nutrients in downstream water, on the parasitism of cowbirds, the concentration of waterflow due to the ditches formed by trails.

The EIR should evaluate alternatives for seperate use trails vs. all multiple use trails. But it should be understood that would mean less trails for each user type.

Please fold in thirds, staple and affix postage.

AFFIX POSTAGE

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

We urge that the EIR thoroughly and honestly evaluate the impacts of each alternative on the wildlife and water quality of the valley and estuary.

Assess impacts on nesting and wintering birds and other wildlife.

Also evaluate the water quality impacts from nutrients, bacteria, erosion, and sedimentation

Assess expansions of invasive species, and habitat fragmentation due to trails

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

e-mail address (optional)

JANICE ALLEN
Name

TREVA & CONCERNED CITIZEN
Organization

1841 WOLVISTON WAY
Street Address

619 429-6494
Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

I am a recent convert to the equestrian world in the Tijuana River Valley. I have never been happier and full of wonder at the free and open land that is slated as part of this project. I understand the idea of letting everyone have access to this area and the desire to make a park. But take into account that horses, bikes and bird watchers can not share the same trails. Bird watchers no problem but bikes and motor bikes, which will also happen even if they are forbidden. Many horses get spooked very easily and someone will eventually get hurt or killed. Please take into account that these trails are maintained at no cost to the state, county or federal funds. The government is wasting hundreds of thousands of dollars planting and trying to wipe out vegetation and it grows back as soon as the next season comes around.

The government has not maintained that area, if you take a look at all of the illegal trailers, homesteaders, etc that have been allowed to set up farms/ranches in that area you will understand what I'm talking about. I have lived in this area since 1975 and had no idea what was in this valley until I climbed on a horse and explored the trails. Might be a good idea for some of the people who are planning this park to take to horse back and see it from the back of a horse. Please consider my input when working on the future plans.

Horses discourage predators from trail area encouraging some species including the Least Bell's Vireo, an endangered bird, to nest next to trails
Presence of trails and equestrians discourage transient from making shelters and setting up shacks and other living quarters in the TRV
Equestrians are the eyes and ears of the TRV – discourages illegal uses of the TRV such as drug trafficking, use off-road motorized vehicles, vandalism, paint ballers, gun enthusiasts, etc
Offers a way to see the beauty of nature: birds, and other wildlife.
THERE HAS BEEN A HISTORY OF HORSES ON THE TRV SINCE 1769!
The CCC Grant was for trail enhancement NOT elimination!!
The ecologists are influencing our government against the horsemen.
There is NO PROOF that the horse trails have any negative effect on the habitat
There are more birds in the TRV now WITH THE TRAILS than there were 20 years ago!
TRV Water District contributed $1.5 million to the SDCoP&R for passive and active use of the TRV NOT habitat
The BASE DOCUMENT must include horse trails – it is the covenant with the trust holders of the TRV
The 71 miles of trails the county accuses us of having does not differentiate between the MOU trails and those made by renegades and illegals and other non-equestrians
There are underprivileged and disabled people that depend on horses and the trails for therapy
This is NOT Del Mar or Ranch Santa Fe, the South Bay is a working class area

where there are limited recreational outlets and opportunities, affordable horse facilities and trails are needed.

San Diego needs a rental stable in the TRV for visitors to discover the wealth of nature in the TRV

A Rental Stable would provide jobs and a physical outlet for young men and women

At the County presentation, a county speaker showed a slide of an equestrian trail stating what a "precious resource" it is. That slide was a shot of Brian's Cathedral Trail – one of the eliminated trails!

Witnessing eco-terrorism. An eco-terrorist believes "The only good habitat is one without any uses by mankind or horses!

Status quo is NOT detrimental to habitat – there are more species near the trails than far away from trails.

Equestrian recreation needs to be expanded.

- **Add overnight horse camping**
- **Keep porta-potties at Staging Areas**
- **Have horse watering trough at Staging Area**
- **Build an arena with bleachers and announcer's booth at each staging area**

Connect the equestrian trails with the Otay Regional Park Trail System

Horses contribute to the local economy: boarding businesses, farriers, vets, feed stores, rental stable, trainers, riding instructors among others.

Cost for making 14+ miles of multi-purpose trail AND maintaining them following annual flooding would be prohibitive. Current equestrian trails are primarily maintained by volunteers in the local equestrian association.

Thanks you for excepting my comments.

Sincerely,

Janice Allen
1841 Wolviston Way
San Diego, CA 92154

Please fold in thirds, staple and affix postage.

Janice C. Allen
1841 Wolviston Way
San Diego, CA 92154-2869

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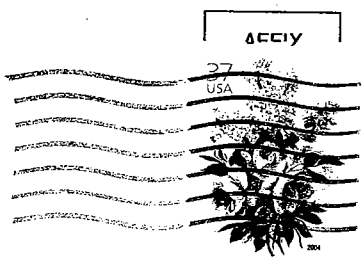

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Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

fax
(858) 495-5841

November 4, 2004

To: Maeve Hanley
Comments for Trails and Habitat Enhancement Project for Tijuana River Valley

2004 NOV 4 PM 5 06

I am a horseman and an ecologist, and from my observations and experience, riding horses throughout the current trails in this area *have no negative impact* on habitat, etc.
In fact, the presence of riders in these areas is good in policing and dealing with transient population and the problems associated with them...ie trash, camping, etc. Many riders are involved in trash clean-up. Not only from that angle, but different species of birds are in fact attracted to horses, and I have witnessed many different flocks nesting around my horse. At one time I was lucky to watch a tribe of the allusive and rare "black-throated Magpie Jay" nesting at the stable I was at for quite a while...they love to perch themselves on the horse's backs and sun themselves. They are such a striking bird.

Dogs should be leashed on the trails, but that is the only hinderance to habitat I can see. I have 2 dogs, and have curtailed bringing them on rides.

I am happy that an environmental organization is involved in the planning, personally. But the suggestion for a single trail for hikers, bikers, and horse-riders is just not that great an idea. First off, from my experience....it's a new world of bikers. These guys (generally speaking) are speed demons. They come whizzing around, and from what I've experienced on the trail....do not slow down for the horses. In fact, some of them get pleasure I think from spooking the riders. This has the potential for some serious accidents. So, at the very least....there should be seperate trails for the horses, and the bikers, but personally, I think they should be seperated at a distance.

I really like the idea of making the trail nice with staging areas, etc. I think it would be nice also to have some ways of getting on and off your horse at different intervals along the way....by that I mean some mounting blocks. It's very helpful for mounting the horse.

I think it's important though to keep some of the existing trails for horses....personally, I think it is one of the best ways to preserve the area. Also, what I would like to see, is more laws enforced about horse-keeping on certain properties. Some of the areas run by Mexicans are quite shabby and the horse-keeping conditions are not good.

This is a wonderful area, and is so important to keep for the horse community....If not protected, soon San Diego will join the ranks of the other concrete jungles we call cities, and this wonderful oasis and home to horses, which has been for over200 years...will be no longer. Please don't let that happen. These horses *need* their home, and the wonderful country feel and pleasure they give everyone with their beauty, is a very good thing.

Thanks for considering opinions, wishes and concerns.

Jan Olson
(858) 268-8704
canyonlook@hotmail.com

James M. Cahill
1125 Alameda Blvd.
Coronado, Ca. 92118

November 1, 2004

Maeve Hanley
San Diego Department of
Parks and Recreation
201 Ruffin Road, Suite P
San Diego, Ca 92123

Dear Ms. Hanley,

My family has had horses and has been riding in the TRV since the early 1960. My six children grew up in the valley on their horses. It was a wonderful experience for them. They learned much and grew into fine young men and women, due much to the lessons and disapline and responsibility they had with their horses. From a very young age, they rode throughout the valley with out any concern for their safety on our part. The valley was and is a pristine and beautiful area.

It distresses and concerns me a great deal to attend the meetings and read the reports that the horse trails are to be such a small part of the development when they are a major use and have been for years in the valley.

Horse are as much part of the environment as any other species. The ecologists need to recognize this fact. There is no proof that horse trails have any negative impact on the habitat, in fact, the trails improve the habitat. The horse is a low impact, non-polluting, gentle animal on the trail. The horse offers the rider the opportunity to see the beauty of nature. Trails and equestrians will discourage transient from making shelters and shacks in TRV. Horse and equestrians can provide safety and protection for the TRV by observing and reporting vandalism, drug trafficking, and other violations of the law.
The rider can also be the eyes and ears of the Border Patrol.

There have been many false-statements and errors in the planning and discussions about the horse trails. I need not go into them with you, as I'm sure you will get many letters spelling them out.

Just keep in mind that the horse and associated activities are huge economic investment in the area of the valley. The initial investment in the horse alone is not inconsequence. The animal alone is a large purchase outlay and with boarding, farriers, vets., feed, stable rentals, trainers, equipment and riding instructions, is a huge contribution to the local economy. These dollars stay in the local area. Hikers, birdwatchers, bikers, etc. do not leave dollars in the valley. They come and go and have no interest, except for the brief time they enjoy the valley. Horse and horse people live and work and keep their interest in the betterment of the valley.

Do not disregard and ignore the benefit of the horse and associated activities to the future of TRV. The horse has been in this valley for hundreds of years with out jeopardy to the environment and will continue to be a benefit to all.

Sincerely yours,

James M. Cahill

DR. JAMES M. CAHILL
1125 ALAMEDA BLVD.,
SOUTH ISLAND
CORONADO, CA.
92118-2708

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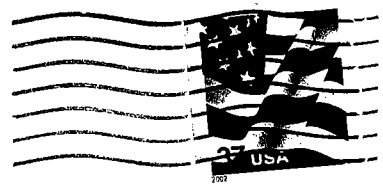

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Maeve Hanley
San Diego Department of
Parks and Recreation
201 Ruffin Road, Suite P
San Diego, Ca 92123

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TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

Faith67@cox.net
e-mail address (optional)

Jacqueline Magers
Name

Organization

1291 Helix Ave.
Street Address

(619) 865-2985
Daytime Phone No. (optional)

Chula Vista
City

California
State

91911
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

by: Jackie Magers age: 12

Did you know that many birds get along well with horses. And did you know that many of the rare birds and just birds nest by the horse trails. If you TAKE AWAY the trails then those birds will not have a place to nest. We deserve the right to have space for our horses and us to have some good quality time and experience out on those beautiful trails. Soccer feilds and basket ball quarts are not needed to take up space on our commutity trails. Please dont TAKE AWAY or beautiful trails. Im sure if you ask other equestrians then Theyll say the same.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

11/3/04

2004 NOV 4 PM 3 04

Maeve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92154

Dear Mr. Hanley,

This is a letter of protest! I have been riding the Tijuana River Valley trails for ten years and I have seen all many changes. The increase of wildlife has been amazing, from creatures, such as cottontail bunnies to different kinds of native birds and migrating butterflies. I seen different types of hawks, and an occasional fox, and the horses didn't bother them. The wild life is so use to seeing the horses they just stand and stare.

Where else can you ride on the beach? This alone, makes San Diego stand above the rest.

Since we lost ***Sandy's Riding Stable*** my friends who don't have horses can no longer ride with me. Other friends who own their own horses, trailer them from Alpine, Ramona and Spring Valley.

The project plan to eliminate all equestrian trails, as we know them, including Sherwood Forest, Cathedral Trail, Brian's Bridle Trail and Wycliff Trail, **is an outrageous proposal and I protest it!**

Also, I can't see how horses, bikers, hikers and walkers can ***safely*** be on the same trail together. **Do you realize the danger involved here?** ***A bicycle coming up fast behind a horse sets the stage for disaster!***

The **$ revenue $** that could be brought to San Diego if the **TRV** Trails where improved could be phenomenal.

I THINK A WHOLE LOT OF PEOPLE ARE MISSING THE BOAT HERE!!!

Do The Right Thing,

Kathleen Stogsdall

Kathleen Stogsdall
IB Divers
641 Ninth Street
Imperial Beach, CA 91932

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

sternos@pacbell.net
e-mail address (optional)

HERB STERN
Name

AUDUBON & SD BICYCLE COALITION
Organization

3634 WYANDOTTE DR
Street Address

Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92106
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Multi use trails mean conflicts - how will they be enforced?
Will there be connections to existing bike trails
74 miles of haphazard trails need to be regulated & reduced
How will horse droppings be controlled?
Trails should go thru high value habitat area
Is there any attempt to purchase inholdings or have owners agree to habitat
Buffer trails & sensitive wetlands
This is high quality bird habitat that needs to be preserved

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

Hanley, Maeve

From: Hanson, Nancee
Sent: Tuesday, November 02, 2004 7:06 AM
To: Hanley, Maeve
Subject: FW: Tijuana River Pheralss

would you be the one to respond? N.
-----Original Message-----
From: GAC [mailto:gacogaco@cts.com]
Sent: Friday, October 29, 2004 5:56 AM
To: Hanson, Nancee
Subject: Tijuana River Pheralss

Dear Ms. Hanson, recently I wrote a TJ River proposal feedback letter in your stationary, Re T J River Park meeting last week. In the vein of the Least Vireo , I forgot to disclose that I have sighted feral (domestic) cats in the Park and these cats would definitely have a catastrophic effect on the L-Vireo population. I have also sighted foxes, however, these I trust mother nature put them in the park. They control both golfers and ground squirrels a rodent population.

A health issue that is also important, many of us walk along Dairy Mart Rd. TJ River bridge. Horses use the bridge pedestrian lane and leave droppings. Dried droppings the wind whip from the smooth concrete pavement on our faces us as we walk by the bridge pedestrian lane. .Also, from a safety stand, the pedestrian lane is narrow, about seven feet wide. It is very intimidating to run into a pair of horses occupying the full lane as we walk on the opposite direction. We never know if a horse is going to kick us or step on us. Please help us walkers, a "pedestrian only sign" is not too expensive. The horses can use the adjacent bike lanes on either side of the bridge just as safe as it is for a bike rider. Would it be possible to have a sign at the pedestrian lane asking horse riders to use the bridge's bicycle lane?

Thank you,

Guillermo

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

Jack739@cox.net
e-mail address (optional)

John Blackburn
Name

Retired local citizen
Organization

868 Ninth St
Street Address

619-424-7011
Daytime Phone No. (optional)

Imperial Beach
City

Ca
State

91932-2102
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

#1 On Exhibit #3 ,upper Lt, (NW Corner), shows a new multi use trail dead ending and the mou trail to be superceded. Seems to me that this trail should not be superceded at least along the western edge of the park as this could be used for most of the year during the dry season. This would provide more continuity to the park.

#2 Same Exhibit, lower Lt, (SW Corner) Why is there no access trail around or through the agricultural lands. This area is not environmentally sensitive nor is it scheduled for restoration

John Blackburn
868 9th St
Imperial Bch CA 91932

SAN DIEGO CA 921
PM
27 OCT
2004

2004 OCT 28 PM 1 05

Maeve Hanley ERM
5201 Ruffin Rd. Suite P.
San Diego, Ca. 92123

92123+4310

To: 2004 NOV 3 PM 4 04
San Diego Dept. of Parks and Recreation

RE: The Trails and Habitat Enhancement Project of the Tijuana River Valley

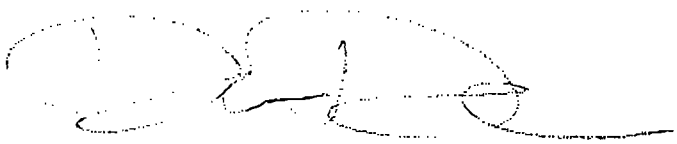
I am a frequent user of the Tijuana River Valley Trails in question under your new "Trails and Enhancement Project, I am familiar w. the issues in the Valley and I feel that the city is attempting to sooner or later eliminate horses in the TRV.
Horses have been a FUNDAMENTAL part of this country, long, long before there were such things as hikers, bicyclists and bird watchers. They do NOT disturb the habitats of anything, they do NOT chase birds, they do not attempt to crush lizards neither do they eat any of the above... As a matter of fact, neither does the rider on top of the horse. A horse is not noisy, actually it is such a natural part of any habitat that hunting on horseback has been prohibited in many areas, because it does NOT disturb the wildlife, thus allowing the hunters to get so close to the game that is it an unfair advantage. No, we are not hunting equestrians in the TRV!! On the contrary, we all enjoy the birds, the wild life in general. We would never do anything to disturb the habitats. Keep in mind, there is a huge area NOT accessible by trails down in the Valley, that are untouched by anybody, theirs is lots of space for any species of animal that calls the TRV it's home. Can equestrians and bird watchers be friends? Yeah!! Why not. When we go out enjoying a quiet ride on the trails in question, we rarely run into anybody else. This is how it has been for years. The TRV is not an over run crowded area. It's quiet, and that's how we like it to continue to be. I am sure we agree on that. Granted! There will always be some "bad apples", that will attempt to spoil the crop, but there are pedestrians like that as well. Not specifically equestrians. And, the only noise that usually is heard on our horse back ride, is the border patrols using the area for off-roading in their jeeps and ATV's as well as the extremely disturbing noise coming from the bulldozers that are part of the reconstruction effort in the Valley.
A concern would be to limit everyone's access and make everybody use the same trail; this includes border patrol, hikers, bikers, equestrians... Anyone, who has ever been on a horse will know that encountering large groups of bikers, hikers and the occasional border patrol doing off roading , is a real dangerous situation. We treasure the smaller trails in the Valley like the Sherwood Forest trail and the bridal Trail, they provide security for us equestrians. . The "illegal" trails that are mentioned are not made by the equestrians and are most likely so overgrown that they are unusable anyways.
It's obvious that the Parks and Rec. Dept. is attempting to concentrate everyone to one trail, thinking that that would eliminate "contamination" by people of all the "sensitive" areas.
I learned in biology that "the solution to pollution is dilution"..A practice used quite frequently by the City of San Diego and the County for that matter.....so, how is it , that in this case you are attempting the exact opposite?? The larger and more spread out the area, the less chance for "people pollution"....And I believe that the bird population

of the TRV has never been healthier than it is now, so the birds obviously are not disturbed by the occasional equestrian coming through. I am sure the habitats around the multi-use trail you have in mind would be suffering once all the traffic in the Valley is concentrated on this one trail.

When it comes to trash in the Valley, yes, granted, there is plenty of that to go around. Is it the equestrians that throw old tires, garbage, mattresses and and variety of old clothing all over the place????(!!)Let's just say, the trash is NOT where the trails are, so obviously the equestrians are helping keeping the area clean. People familiar w. the Valley will know that this has been part of the scenery as long as they can remember. It's not pretty and we would not miss it when it's gone. But that is a whole lot more damaging to the environment than the entire equestrian community of this state would ever be. Does this mean that Tijuana is the next area to be put on the spot by the Park and Recreation Department?? Because this is the one REAL threat to the environment and the habitats in the TRV.

To sum this up, we need the TRV to be open for everyone who will enjoy it responsibly. We need to keep a variety of trails to avoid a "rush hour traffic" scenario on the one trail the Park and Rec. is proposing. And, honestly, use the grant to do a thorough trash clean-up in the Valley, as that would benefit the wildlife, the hikers, bikers and the equestrians alike.
Maybe we can all work together to make the TRV the attractive, charming and inviting Valley that it really is, and make it a place for all of us to enjoy for years to come.

Sincerely,



Dorte Dresher
4725 Muir Ave
San Diego, CA 92107
(owner of 2 "TRV"horses)

Gary J. Amaral, DVM
3916 Allen School Road
Bonita, CA 91902
619-267-7775

2004 NOV 2 PM 2 02

SAN DIEGO CA 921
PM
01 NOV
2004

Maeve Hanley
S.D. Co. Dept. of Parks & Recreation
5201 Ruffin Road
Suite P
San Diego CA 92123

November 1, 2004

Maeve Hanley
San Diego County Department of Parks & Recreation
5201 Ruffin Road
Suite P
San Diego, CA 92123

Please keep our trails open in the Tijuana River Valley.

Thanks

1955 Bluehaven Ct
San Diego CA 92154

Gary J. Amaral, D. V. M.
3916 Allen School Road
Bonita, CA 91902

November 1, 2004

Maeve Hanley
San Diego County Department of Parks & Recreation
5201 Ruffin Road
Suite P
San Diego, CA 92123

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Thanks

Maeve Hanley, M.S.
Environmental Resource Manager
Department of Parks and Recreation
5201 Ruffin Road, Suite P (MS029)
San Diego, CA 92123
Ph: (858) 694-2968
Fx: (858) 495-5841
Maeve.hanley@sdcounty.ca.gov

2004 NOV 4 PM 3 00

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Email (optional) gmoria@hypercon.net

Name GALE MORIARITY Organization _____

Address 1672 Ocala Ave phone (optional) (619) 421-4548

City Chula Vista State CA Zip 91911

Where are the TRAIL ENHANCEMENT parts of the project???

1. **Keep what is already there for the horses and <u>enhance</u> by adding at least one 2-acre community rodeo and show arena with the same kind of amenities you added for the great ball fields! Build bleachers and a 2 story announcing booth like Sweetwater has so that we can have horse shows and educational opportunities for the horse people and the community. Include several horse washstands, porta-potties, horse-trailer parking, regulation size arena, facilities for team-penning, water troughs, picnic tables, BBQ's and 20 corrals as well as adequate parking for the public. This facility can also be used for therapy horses, 4-H, FFA and other educational services that include agriculture and animals. Use land on the NE of Hollister & Sunset.**

2. **Add overnight horse camping with water and bathrooms and at least 12 corrals. This would bring people from all over the state! Place this at the Staging Areas**

3. **Add a Mounted Assistant Unit (MAU) to regularly patrol all of the Regional Park, State & Federal parts of the park on horseback.**

4. **Add markers along the trails for reference for emergency use. Health and safety have not been addressed. Markers would help MAU & other horsemen report problems or get help in emergencies. (fire, shooters, paint balers, motorized vehicles, alcohol or drug use, etc.)**

5. **Facilitate the creating of a <u>Friends of TRVRP</u> with at least one member from each of the interested, affected groups: businesses, farmers, horsemen, Mounted Assistance Unit, TRVEA, etc.**

6. **Keep all of the narrow horse trails that TRVEA has on their maps (MOU Officially Sanctioned trails) including among others the Wycliff, Sherwood, Sherwood by-pass, Cathedral, Brian's Bridle, Beach Trail, 25 yr South Berm, PERL Rd., Sherwood to Eastern Staging Area, Algun Trail, Mesa link trails, Saturn to Monument Rd.**

7. **Dedicate at least 5 acres for a RENTAL STABLE for horse rental to the public. Lease it for 20 years for a nominal fee. Locate it on the NE corner of Hollister and Sunset near the arena.**

8. **Guarantee horse trail connections to all horse-related business and farms and the mesas, beach, State Parks horse trails and US F&W horse trails, staging areas and multi-purpose trail.**

9. **Reduce the 6' wide multi-purpose trail to be basically around the borders of the TRVRP to minimize the impact on habitat. Share the mitigation of the 71 miles of pathways/roads/trails with the 2' wide narrow horse trails. (That would mean that a 2' wide trail would take only 1/3 of the amount of mitigation that a 6' wide multi-use trail would require.)**

10. **Facilitate a recycling area where manure can be dumped, turned, and composted for use by local farmers and the city.**

11. **Construct a skateboarding park west of Hollister at the very north end of the TRVRP.**

12. **Suggestion: build a bike path separate from the equestrian trail along the border of TRVRP– they can be adjacent, but need different footing. The hikers then can choose the best footing for themselves and use either trail.**

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

1717 Kettner Blvd., Suite 100 ◆ San Diego, CA 92101 ◆ (619) 235-0281 ◆ FAX: (619) 232-3670
ehc@environmentalhealth.org ◆ www.environmentalhealth.org

November 4, 2004

Ms. Maeve Hanley
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932

RE: EHC Comments on the Notice of Preparation for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project

Dear Ms. Hanley

Environmental Health Coalition (EHC) wishes to submit the following comments regarding the Scoping for Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (TRPP). We strongly support the TRPP and applaud its effort to replace planning-by-chance with planning-by-design. The restoration efforts are critically important and we need to ensure that the trails plan is designed in a manner that improves the quality of use of the area for people and results in environmental improvements for habitat and wildlife. As with any multi-use area, there are a myriad of interests to be considered but the challenge is important and worthy of our collective best efforts. We thank the County for being thoughtful and proactive on this issue. The ultimate plan should result in a well-designed set of trails and restoration projects that provide a quality experience, broaden the range of uses for more people, provide maximum protection for habitat and actions that fully mitigate impacts.

CUMULATIVE IMPACTS OF ALL TRAILS NEEDS TO BE ASSESSED

The DEIR must assess the cumulative impacts, not just of new proposed trails, but of existing, adjacent trails and uses-- whether planned or not. There must also be an analysis of issues such as the Monument Trail head Road and impacts induced in the park from adjacent uses and developments.

ALTERNATIVES SHOULD FOCUS ON MULTIPLE USES OF THE AREA

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- Endangered Species Management
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- Blinds and overlooks
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- Wildlife Viewing

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- Photographic uses
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- Cultural tourism
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IMPACTS MUST BE FULLY ANALYZED AND MITIGATED

Visitor trails and facilities must be very well thought-out and managed so that they do not degrade the habitat value, the wildlife, and the water quality. Flooding and erosion impacts must be avoided in the design.

IMPACTS OF ANIMAL WASTES MUST BE ADDRESSED AND MITIGATED

Mitigations for water quality impacts must be fully addressed and the implications of the stormwater permit must also be addressed. Just as users of the dog beaches in San Diego County have had to radically change their behavior regarding dog waste on the beach, we need to develop a mitigation plan for horse and dog waste on the River Park trails. Since there is are active and effective stewardship groups of hikers and equestrians, we recommend that the County partner with these groups to establish a regular and funded series of Trail cleanup days that would, on a weekly or monthly basis, walk all trails where horse and dogs are allowed to clean up and remove waste. This would be an action that would assist the County in compliance with the Municipal Stormwater permit and would reduce associated water quality and habitat impacts of the waste.

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THE IMPACTS OF THE TRIPLE BORDER FENCE MUST ALSO BE INCLUDED IF THE FENCE MOVES FORWARD

It is critical that the expected environmental devastation that will be wrought on the area if the triple fence is allowed to move forward be addressed in the analysis. Unfortunately, a local Congressional leader is attempting to make the Triple fence exempt from virtually all environmental laws. This will do nothing but further, negatively, impact what use and the extent of uses that can be allowed in the Tijuana River Park by the general public.

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There are multiple planning efforts on-going that will impact the development of this regional asset. The San Diego National Wildlife Refuge Comprehensive Conservation Plan, the City of Chula Vista's General Plan and Bayfront Master Planning Efforts, the Chula Vista Greenbelt plan, Otay River Regional Park, and the County's General Plan 2020.

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While there is much focus on the animal species in the region, the DEIR must fully analyze and mitigate impacts to plant communities as well.

IMPACTS FROM TRADE IN THE GLOBAL ECONOMY

Baja California including the Tijuana Watershed is an area that has experienced severe environmental degradation related to trade. We can expect further environmental impacts under the current trade regime where inadequate monitoring and enforcement of environmental impacts is routine and well-documented. Increased and uneven trade development will translate into increased hardening of the watershed as well as growing and changing pollution issues that should be analyzed and mitigations planned.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Laura Hunter, Director
Clean Bay Campaign

Amelia Simpson, Director
Border Environmental Justice Campaign

Environmental Health Coalition

1717 Kettner Blvd., Suite 100
San Diego, CA 92101
(619) 235-0281 ~ Fax (619) 232-3670
Email: EHC@environmentalhealth.org ~ website: www.environmentalhealth.org

FAX Transmittal

Date: 11/1/04 No. of Pages 5 (including cover sheet)

To:

Fax #: 858-694-2963 495-5841 Phone #: 858-694 2968

From: Laura Hunter

Re: Scoping letter for TJ Park

Message:

Copy for GC File? ☐ Yes ☐ No	Fax Transmittal Completed? ☐ Yes ☐ No

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

1717 Kettner Blvd., Suite 100 ◆ San Diego, CA 92101 ◆ (619) 235-0281 ◆ FAX: (619) 232-3670
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While there is much focus on the animal species in the region, the DEIR must fully analyze and mitigate impacts to plant communities as well.

IMPACTS FROM TRADE IN THE GLOBAL ECONOMY

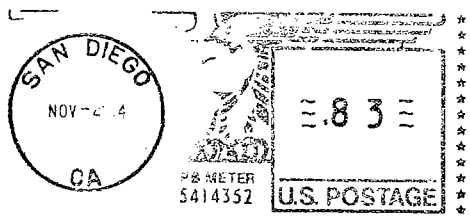
Baja California including the Tijuana Watershed is an area that has experienced severe environmental degradation related to trade. We can expect further environmental impacts under the current trade regime where inadequate monitoring and enforcement of environmental impacts is routine and well-documented. Increased and uneven trade development will translate into increased hardening of the watershed as well as growing and changing pollution issues that should be analyzed and mitigations planned.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Laura Hunter, Director
Clean Bay Campaign

Amelia Simpson, Director
Border Environmental Justice Campaign



Ms. Maeve Hanley
S.D. County Dept. of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 91932
92123

Tijuana River Valley Regional Park
Trails and Habitat Enhancement Project
Clearing House #20040921159

Comments

November 1, 2004

Daniel Egger
1931 Leon Avenue
San Diego, CA 92154
619-423-7828

R/E: TJVRP Trails Plan Project Comments:

I have lived in the Tijuana River Valley my entire life.

In the early 1900's my Grandfather purchased a lot of the land here and made his living with a Dairy and Farming. Everyone had freedom to ride their livestock throughout the land and enjoy the beauty and the serenity of the Tijuana River Valley – all the way out to the ocean.

People living in East and North County would always make derogatory comments regarding the unseemliness of the area. All the better for us that no-one would invade our hidden treasure in this area. It's not even comprehendible that our Freedom could be taken away and restricted to where we could walk, bicycle, ride our horses in this valley not mention the agriculture.

I don't believe that the majority of people in the area are even aware that all there freedoms are being restricted and or removed. There under the assumption that you are keeping this as open space but with their entitlement to enjoy it as well.

I thought our local leaders were elected to represent ALL the people and help preserve our rights to enjoy public land.

The wildlife do extremely well on their own – that's nature, let the people enjoy there walks and bicycle rides. Let all the horsemen enjoy any trial they want to take – that's being FREE. Let the Boarder Patrol do the Great Job they also do to keep us SAFE. Let's not waste time and money on people making decisions we don't want.

Share the land,

Daniel Egger

Daniel Egger
1931 Leon Avenue
San Diego, CA 92154

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SAN DIEGO CA 921
PM
02 NOV
2004

Ms. Maeve Hanley
San Diego Department of Parks & Rec.
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

Tijuana River Valley Regional Park
Trails and Habitat Enhancement Project
Clearing house #20040921159

Comment

November 1, 2004

Vicki Egger
1931 Leon Avenue
San Diego, CA 92154
619-423-7828

R/E: TJVRP Trails Plan Project Comments:

I write with great disappointment of government officials using there power to take away public access. I have lived in the Tijuana Valley my entire life. I have walked, bicycled and ridden horses throughout these years. For all these years nobody has had interest in our valley. Now that you have found wildlife that has co-existed and grown, you plan to come in for **YOUR BENEFIT** and push us out. This multi-use trail is your attempt to say that you have not taken away – you've only made things better. This is a line of _____! This Valley has survived just fine without your intervention.

You may want to concern yourselves with important issues like Sewage. Yes, a plant was built that was not capable of handling the amount of waste that comes our way. What are your future plans for this? Will you address this in your EIR?

This land is also used by the Boarder Patrol to track Illegal Migrants. Will you supercede them using the land also? Will they agree to your attempt to stop them from doing their job? It must be convenient, to not live or enjoy and area, yet use environmental laws (one sided) to make changes that you assume will work and make things better and for whom?

As oppose to pushing out the public and superceding acknowledge trials. You should keep and enhance what we know can exist together. San Diego County Parks and Rec. through CEQA should keep the existing trials and enhance them as you plant the valley. With the addition of trails as you plant will keep the Migrants, Border Patrol and the general public HAPPY as well as staying in areas open to the public. Fencing off the land only makes for multiple unwanted trails that create more of a disturbance than protection for wildlife.

Keep in mind that you are here for the ENTIRE PUBLIC as well as the wildlife, not just extreme special interest groups. It's unjust to throw a crumb to the residents of the valley and expect it should satisfy.

"History" and "Seniority" of who and what have occupied this valley should be brought into the equation as you make decisions.

REPRESENT ALL!

Vicki Egger Vicki Egger

Vicki Egger
1931 Leon Avenue
San Diego, CA 92154

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Ms. Maeve Hanley
San Diego Department of Parks & Rec.
5201 Ruffin Road,Suite P
San Diego, CA 92123

92123+4310

Please fold in thirds, staple and affix postage.

Don Opel
2223 Imogene Av
San Diego CA 92154

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Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

None - Fax (619) 423-3858
e-mail address (optional)

DON OPEL
Name

Stable owner TRV Buiness Coalition
Organization

2223 Imogene Av San Diego, CA 92154
Street Address

(619) 423-3858
Daytime Phone No. (optional)

San Diego, Ca.
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

AGRICULTURE

REF: MAP Sheet B
Exhibit 4 Draft 9-23-4

No provisions are shown to restore properties that for years were being farmed i.e. EFFIE MAY FARMS, ROBERTS PROPERTY, Last farmed by DAN MARSHALL, and SPOONER MESA. The WILLIAMSON ACT enacted over 2o years ago was designed to protect and preserve agriculture. I believe some provisions in this Actrelates to government owned land and could impact the developement. I believe WILLIAMSON should be scoped very closely. It appears on your exhibit that over half the acreage is earmarked for habitat restoration.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
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PLEASE PRINT

e-mail address (optional)

GEORGE DON OPEL
Name

Organization

Street Address SEE SHEET 1

Daytime Phone No. (optional)

City

State

Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

EQUESTRIAN TRAILS

REF: ~~Exhibit 3~~
Sheet A Draft 9-23-4

Equestrians ride to experience the environs of the trail, not to get from one point to another. This has to be completely understood. ~~Almost every trail has some special meaning to many different riders,~~ thus you have a strong reluctance of many to give up even one foot of trail. This may be especially true of someone who has been riding a trail ~~for 35 years. Please bear in mind that these trails are not roadways~~ used to travel from one point to another.
Horse trails in the Tijuana river valley can be traced back about 200 years, but recreational trail riding really started growing in the mid 1970s and now is by far the largest recreational activity in the ~~valley. As the horse population increased riders began developing~~ trails using paths made by immigrants passing through from Mexico,

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

SEE SHEET 3

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
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PLEASE PRINT

e-mail address (optional)

GEORGE DON OPEL
Name

Organization

Street Address SEE SHEET !

Daytime Phone No. (optional)

City

State

Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

old farm service roads, and other passable areasof which there were many because prior to the floods of the 80s very few trees ~~existed in the west end of the valley. The willow forests present~~ today came after the floods and are aided in the're existance by the renegade sewer floods coming from Mexico. This is how ~~the trails system we have now was developed. In trying to develepement~~ establish credibility for the trails, equestrian activists and numerous government agencies met and developed a memorandum Of ~~understanding regarding the existing trails. This document is~~ recognized and is,and has been used for several yearsas a guide for trail use and trail developement. We insist these agreements ~~be recognizedand would hope all those trails remain as part of~~ our trails system

xxxxxxxxxxx

MULTI_USE TRAILS

Equestrains have always supported multi-use trails but have the following concerns: Safety prpblems with horses and bikes.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

SEE NEXT SHEET

Summary of comments

FROM: Don Opel
Date: 10/25/04

AGRICULTURE

The farmers and business people in and around the Tijuana valley are very dissapointed that little consideration has been given to the preservation of agriculture. Out of 1800 acres only about 25 acres is designated for agricultural useand that is being used for community gardening. Your map exhibit shows about 2/3 of the acreage in the park designated for habitat restoration. This certainly shows no semblance of balance in planning.

TRAILS

Your map exhibit of proposed trails, are not really trails, just a roadway circling the valley. This is how it is perceived by equestrians and is totally unacceptable. It is hoped that the contract (M.O.A) signed by the various government agencies and the equestrians will be honoredand those trails covered under the contract will remain intact, if not we would expect a logical and real answer to why.Balance in planning is certainly exhibitedwhen your map exhibitshows 2/3 of the acreage in the park designated for habitat restoration and wetland planning.
Your timeframe seems a little short for developing an E.I.R
We are not willing to accept allegations from some government agencies that horse droppings spread noxious weeds and they are unwilling to accept what is being observed by equestrians regarding the nesting habits of the least Bells vireo.
These should not become issues unless validated

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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PLEASE PRINT

e-mail address (optional)

GEORGE DON OPEL
Name

Organization

Street Address

Daytime Phone No. (optional)

SEE SHEET ONE
City

State

Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

Wide enough trails to accomodate horses and bikes. Most of the existing trails surfaces is not suitable for bikes. A surface suitable for horses and bikes would be very expensive to construct and impossible to maintain.

Trails Issues

~~It i s alleged by numerous government agencies that horse droppings~~ along trails spread noxious weeds. This needs validating. Thereis strong evidence that the least Bell,s Vireoprefers nesting along horse trails. This needs validation

Business

~~Horse boarding in the valley has become a large business. For horse~~ business to remain viable a trails system is vital

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

St clearinghouse
#2004091159

POINT PAPER

On

The Proposed Notice of Preparation of a Draft Environmental Impact Report

October 24, 2004

Tijuana River Valley Regional Park Trails and Enhancement Project
(Proposed Project)

Submitted By

CITIZENS AGAINST: San Diego County Parks and Recreation to close existing equestrian trails in the Tijuana River Valley, Removal of existing berm north of the Am-Sod/Disney property, Elimination of trail segments proposed to extend through habitat restoration in planning Phase 1 and Sand and Gravel operations for proposed habitat implementation.

Diane Porter and Tom Olmstead

Diane Porter
1976 Grove ave
SD CA 92154
diane@our.com

POINT PAPER
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PURPOSE

The purpose of this point paper is to address and analyze key issues surrounding the proposed and RESULTANT Notice of Preparation (NOP) of a Draft Environmental Report for the Tijuana River Valley Regional Park Trails and Enhancement Project originating from a biased, no community input , February 12, 2004 response letter by Renee Bahl of County of San Diego Department of Parks and Recreation addressed Jim Bartel, Field Supervisor, U.S. Fish and Wildlife Service. It is also our intention throughout this process to provide information and make recommendations to the County decision makers to fairly balance their decisions in regard to the community needs you are paid to serve. The most outstanding need with in our San Diego community is the need to secure and protect the few equestrian trails remaining in existence today. Therefore, proposed trail closures and elimination of all trail segments proposed through new habitat, adjacent to environmentally sensitive areas, proposed berm removal and Sand and Gravel operations for implementation of proposed habitat will be thoroughly discussed. This point paper will also outline: Poor community relations, community unaccountability and community disassociation, unbalanced and biased environmental project framework planning, exaggerated, non proven and biased environmental reference, special interest and weighty financial influence relative to land use management planning, evasive, and contradictory practices of the San Diego County Department of Parks and Recreation.

BACKGROUND

The Tijuana River Valley Regional Park (TRVRP) Trails and Enhancement Project was mostly funded to the County of San Diego through Jim King of the California Coastal Conservancy (CCC) on February 27, 2003, File No. 03-002. The history of this project began with a twenty-year land acquisition program carried out by San Diego County with most funding for this program administered by the Resources Agency, Wildlife Conservation Board and the Coastal Conservancy. Basically, **this grant (which aligns with the 1999 TRV local coast land use plan) states for an INCREASE IN HABITAT PRESERVE AND <u>LIMITED</u> RECREATIONAL AND AGRICULTRUAL USE IN THE TRV.**

Fourteen hundred thirty-nine acres of public land was acquired in the Tijuana River Valley. Currently, according to the October 4, 2004 N.O.P., 1,638 acres are owned by the County. Through out these years, targeted private land owners in the Tijuana River Valley were approached by the County of San Diego to sell. Interestingly, some of these same land owners lost their property to the County through various means including eminent domain. Zoning changes also related to the goals of this project confronted long time residents in the TRV, threatening their very existence. These zoning changes eventually resulted in massive zoning violation notices and/or threatened announcements by city code enforcement officer Randy Seever in March 2004 (an interesting time frame considering Renee Bahl's February 12, 2004 overactive response letter to U.S. Fish and Wildlife). One of these threatening visits by Code enforcement in the TRV is related to the untimely death of a long time resident in the TRV. Litigation is pending.

The TRV has been/is a target valley for environmental special interest groups. The unique history and culture present for many years in this valley has been superseded in a calculating way by a few unelected land use management bureaucrats to push forward the environmental special interests of a select group of people with powerful financial resources and the backing of Federal, State, County and Local government laws. The described unjust practices by the involved governmental agencies taking advantage of existing laws have led to this current biased N.O.P. TRVRP trails and habitat enhancement project phase II, which is understandably deeply rejected by the community user groups at large and by local citizens currently learning about these injustices practiced for years in the TRV.

Recent examples of SD County Parks and Recreation circumvention around the community and regardless of the input and desires of the community is during phase I of this project. In the fall of 2003 several phase I meetings took place in which a working map was developing through community and the involved agencies. By December 2003, a map was introduced with several trail systems; the multiuse trail, most narrow existing horse trails, and future narrow horse trail planned in future habitat. The berm was being utilized as part of the multiuse trail. A follow up meeting on January 25, 2004 was scheduled, but abruptly cancelled after SD County Parks and Recreation (SDCPR) received the January 9, 2004 USFW letter and had responded with their overreaction letter dated February 12, 2004, to essentially close all trails and completely abandon the prior phase I work accomplished by all the participants including the community at large.

SDCPR, further responded to completely undo or almost turn backwards in the project mostly targeting any equestrian activities and equating it to harm on the habitat. This mind set led to the current NOP. In essence, Renee Bahl wrote up a new plan regardless of community input or the truth behind her baseless science accusations. This is one example of intentional deception and unaccountability to the public.

Second example is the NOP itself. SDCRP insists we had 30 days to comment. WE DID NOT HAVE 30 DAYS TO COMMENT. We were not aware until late October of this NOP. I have asked for additional time, but it was refused.

Time is of essence; therefore this area as well as many areas in this point paper will be thoroughly completed at a later date. Supporting evidence will also be included to support each and every statement of fact.

This TRVRP Trails and Enhancement project grant provided to the County of San Diego by Jim King from the CCC includes veiled hard line environmental objectives (due to the MSCP directives) and inversely less attention for the affected social, economic and cultural heritage in the area. To follow, please find attached hereto, designated exhibit "1" and by reference made a part as if fully set forth herein at length, a true copy of TIJUANA RIVER VALLEY HABITAT RESTORATION AND TRAIL PROGRAM Agenda Item 6. February 27, 2003, specifically; page 0-5, and page 0-12 respectively, "More specifically, the proposed project would include the following types of tasks: Consulting with all pertinent local agencies, state and federal resource and regulatory agencies, community groups and other stakeholders throughout the planning process (with special attention to coordination with the MSCP parties, Tijuana Estuary restoration and management entities, watershed planning, and agencies with trail linkages)...The City of San Diego's Tijuana River Valley Local Coastal Program approved in 1999 identifies the project area as a Core Biological Area within the City's Multiple Species Conservation Program (MSCP). A goal of the program is the preservation, conservation, restoration, and management of sensitive habitat and significant natural resources within the valley and the provision of public access compatible with it. The proposed project will advance this goal."

This inverse relationship and unbalanced approach in the TRVRP framework is a leading factor in the ongoing and often intense conflict

among trail advocates and property owners. Therefore, in order to arrive at a fair and balanced decision, the community user groups in the TRVRP need to be **seriously** considered into this management plan. The decision makers comprised of politicians, bureaucrats in SD County Department of Parks and Recreation whom historically align to the left in environmental issues and the involved environmental agencies have difficulty at best in their understanding about the necessity to also preserve the cultural heritage of the people in the TRV. This will require balanced and thorough planning in order to truly address the needs of the entire community and ultimately come to a peaceful agreement between all parties.

The only way to hopefully achieve a balanced plan is to begin with a panel of representatives who fairly represent the community on the Draft EIR panel. Presently, the draft EIR panel consists of: Tim Jachlewsk – project planner(has never been in the valley on the trails) and associates, Jeffrey Harvey, Ph.D. – environmental planner and associates, Maeve Hanely – county employee environmental resource planner, Cory Linder – Land use management, Renee Bahl – SDCPR director and several other staff employed by SDCPR. This panel is completely unbalanced to the environmental left. How can a balanced decision for trails, especially equestrian trails be accomplished with out an expert equestrian trail advocates and an expert agriculture advocates? Once again another planned biased round table to just curtail our comments and go through the required motions by CEQA, ultimately to push forward with SDCPR agenda which is really CA COASTAL CONSERVANCY'S AGENDA. We will not allow you to continue on this unfair unbalanced biased road you have chosen to take and pay no attention to us, your community you are suppose to serve.

The adopted MSCP (multiple species conservation plan) sub area plan by the City of San Diego (1997) was prepared pursuant to guidelines developed by wildlife agencies to meet the requirements of the California Natural Communities Conservation Planning Act of 1992. This MSCP sub area plan is the basis of the contract between the City and wildlife agencies to ensure plan implementation and then thereby allows the city to issue take permits at the local level. By the City signing onto this contract with wildlife agencies, the city stood to gain financially since it allowed the city to issue these take permits locally, while land use policies over their public lands (TRV in this case) shift to stiff environmental land use policy goals of the Wildlife agencies creating an unbalanced, unfair situation in regard to the social and

recreational needs of the community at large. In essence our government laws if taken advantage of could sell us out for financial gain.

From the Preserve Design Criteria contained with in the MSCP, the MHPA (multi-habitat Planning Area) was also developed by the City in cooperation with Wildlife agencies. The MHPA delineates core biological resource areas targeted for conservation in which limited development may occur. Approximately 90% of the MHPA lands within the City's sub area will be preserved for biological purposes. In some cases 100% of an area will be preserved. In laymen's terms, this basically means locking the public out of this preserved land, while the endangered species enjoy ***thousands*** of acres of this wonderful real estate. **Ninety-four percent of the Tijuana Estuary/Tijuana River Valley is identified as the City's MHPA or "Core Resource Area" which now means this area is now subject to extreme environmental restrictions which are called directives under the MSCP.** Who really looses out on this measure are the established community user groups, because now for example, that same area is now restricted to everything and everybody including horse back riding on habitat trails that have been there and in use for decades.

FOCUS OF CONCERN

In accordance with the guidelines specified in Title 14, California Code of Regulations Chapter 3, Section 15082, Notice of Preparation and Determination of Scope of EIR. The NOP must address two key areas; the proposed project description, and potential environmental effects. Upon review, the following areas of concern are addressed in this point paper.

Project Description:

In this proposed project, you cannot possibly fit a whole community with different types of needs on one multiuse trail essentially around the perimeter of the Habitat and expect to meet the needs of that same community.

Component 1. Creation of a multi-use recreational trail network:

The assumption of this multiuse trail being the only trail system in the TRVRP is absolutely absurd. The impacts would involve increased safety issues, poor aesthetic issues, loss of historical culture and increased noise

and footing problems for the horses. Bicyclists have no interest in the valley during the wet season and in the existing narrow horse trails.

The importance of these narrow horse trails through the habitat and future habitat serves many purposes ie, fire access, patrol access, scenic access, unique community resource. According to experts in the field, the environmental effects upon the endangered species/habitat are very minimal to none. In fact, Renee Bahl stated in her February 12, 2004 letter to USFW, "Reduce the width of the equestrian trails designated in the project as 8 feet and 4 feet to 2 feet, which is currently being used in the Valley *with minimal impact."*

Changing the trail design would have a large impact on the cultural heritage with in the TRV. Horse back riding in the TRV has been a staple for over a 100 years dating back to the days of agriculture.

Legally, the trails cannot be removed related to: public rights of way established pursuant to43 United States Code section 932 (commonly referred to as R.S. 2477) and an affirmative statement that the Public's access over the R.S. 2477 rights-of way will not be impeded, H.R. 2966 the right to ride bill, Section 4(b) of Public Law 88-577, and the existing MOU signed by SDCRP in 1998 but with other agency signatory's since 1996.

The NOP project description asserts the presumption that an approved trail structure does not exist for the Tijuana River Valley Regional Park. This is clearly misunderstanding; Exhibit 3 of the NOP graphically illustrates the well-defined trail structure. In addition to Exhibit 3 of the NOP, the existing well-defined trail structure is described in detail in the Memorandum of Understanding for Inter-Agency Trail Coordination (MOU) signed by the County in 1998.

The NOP asserts that trail closures will be utilized where haphazard and unplanned development of trails has resulted in habitat duration, deterioration of the quality of natural resources, and declining recreation user experience in the Tijuana River Valley Regional Park. The existing trail system has been in use by a myriad of passive recreational users since and well before the inception of the MSCP. It is a complex network that provides easily definable access corroders throughout the Tijuana River Valley Regional Park. The density of the surrounding forage precludes trail "wanderings" and ensures the continued integrity of the environment.

The NOP assertion that the trails promote degradation of the natural habitats cannot be substantiated. Environmental degradation is limited and may be due in part to transients and undocumented aliens attempting to elude the Boarder Patrol by veering off the established trails. Legitimate recreational users of the existing trail networks are careful to adhere to the standards of conduct explicitly stated in the MSCP MOU and jealously guard the area from intrusive activities.

Mitigation measures to address any degradation and erosion consist of maintenance by pruning, signing, mapping, river channel maintenance, import fill material, trail rerouting, trail rotation system, education.

The Tijuana River Valley Park existing trail structure is a vital component in the complex nesting topography for the Least Bell's Vireo. Visual inspection of Exhibit 3 of the NOP closely correlates the location of Least Bell's Vireo nesting habitats with the trail structure. The location of Least Bell's Vireo nesting areas next to open areas and trails is a well-documented characteristic (Fish and Wildlife 1998 and recent surveys). Closing any of the existing trails within the environmentally sensitive natural habitats will force the Least Bell's Vireo to migrate nesting to the heavier trafficked trails located outside the protected habitats.

Finally the NOP asserts that this trail network (Exhibit 3) will be superseded at the completion of the completed proposed project (EIR) a condition that appears to be in direct conflict of the "No Surprises" clause (EIR/EIS 1998).

Component 2. Habitat creation and restoration

The endangered Least Bell's Vireo who likes the horse trails are almost always nest near open spaces or trails. If a horse trail is rerouted the Least Bell's vireo will relocate to nest near that horse trail. Horse droppings attract beetles one of the Least Bell's Vireo favorite entrée's. But it seems the environmental agencies know better. They want the horses out even though there is no logical reason. For past years since the endangered species program began for the least bell's vireo in the TRV, number pairs have flourished with the present horse trails. Some claim noise from horses will cause LBV to stop calling – not true states PHD specialist in this area – exhibits to follow. This PhD further states the horse back riding has no impact on the habitat or endangered species.

Habitat consists of riparian willow and marsh. Riparian willow is very strong and now invading the cut unwanted orando.

In regard to horse manure and invasive plants, there is no relation in the TRV according to experts. Bermuda grass is not existent. River flows bring down orando, trash and sewage. Horse manure degrades very with in 24 – 48 hrs. The water table is not affected. Studies to follow.

Habitat restoration projects are adequately addressed in the existing MSCP and supporting subarea plans. Enthusiasm for restoration projects must be tempered with knowledge of the Tijuana River Valley Regional Park topological construct. Excessive grading of existing terrain and the proposed removal of the Valley's protective berms degrade the current topology. The consequences of these terrain changes magnify the potential for heavy flooding significantly threatening the Least Bell's Vireo habitat.

Low lying terrain coupled with the high water table not only raises the ground saturation point but also greatly accelerates excessive growth in sensitive habitats areas. Excessive growth disrupts the Least Bell's Vireo breeding habitat dictating frequent forage remediation efforts to remove the excessive growth. Clearing of vegetation within sensitive Least Bell's Vireo nesting sites will certainly result in abandonment of those nests (Fish & Wildlife 1998).

Component 3. Installation of a steel-truss recreational bridge;

No issue

Component 4. Interpretive/directional signage and beaches at key areas;

Signage exists throughout the Tijuana River Valley Regional Park and provides an adequate information system for all visitors. The San Diego County Department of Parks & Recreation needs to maintain the signs distributed in the existing program and use conservative intervention with the new program (not to many).

Component 5. Bird observation blinds and trail fencing;

Erection of blinds and trail fencing creates problems that are counter productive to the preservation of the sensitive environmental habitats.

Fences restrict wildlife access to food and water, and guide wildlife onto roads. A more environmentally sound solution to limit human intrusion into sensitive habitats is to let the natural vegetation, topology, and limited signage restrict movement to existing trails only.

This strategy promotes fluid transient corroders for passive recreational users, transients, and undocumented aliens channeling them away from sensitive environmental habitats.

Installation of blinds encourages longer-term disturbance of these sensitive environmental habitats. Fixed structures such as blinds and fences disrupt linkage and degrade the ambiance of the Tijuana River Valley Regional Park.

Component 6. Eastern trailhead staging area consisting;

No issue

Component 7. Creation of a park management plan;

The MSCP together with the sub area agreements are more than adequate to support the development and management of activities and resources within the Tijuana River Valley Regional Park. Exhaustive studies and extensive comment by the public contributed to phase I of this project with a reversed outcome and also many hours devoted to the creation of the MOU. A map is included of the MOU trails. Each of these trails in the valley are significant to its peaceful affect upon the rider. The social economic importance of being able to come and be a part of this nature is incalculable.

Potential Environmental Effects:

The potential environmental adverse effects associated with the implementation of the proposed project are significant. Comments to the proposed project description contained within this document more than adequately address the potential for negative environmental effects stated in the NOP.

SUMMARY

The NOP is fundamentally flawed, misstating the status of the existing trail structure and fails to cite specific examples of environment habitat damage caused by as a direct result from the passive recreational activities in the Tijuana River Valley Regional Park.

It must be pointed out to the County Parks and Recreation that the Tijuana River Valley is a park not a preserve and should be access to members of this community to enjoy the unique environmental as-well-as recreational amenities.

The County of San Diego Parks and Recreations should abandon its plan to generate a new EIR and continue to honor its current agreements (MOU 1998).

References

City of San Diego. 1998. Final EIR/EIS of Issuance of Take Authorizations For Threatened and Endangered Species. Environmental Analysis/Development Department. San Diego CA.

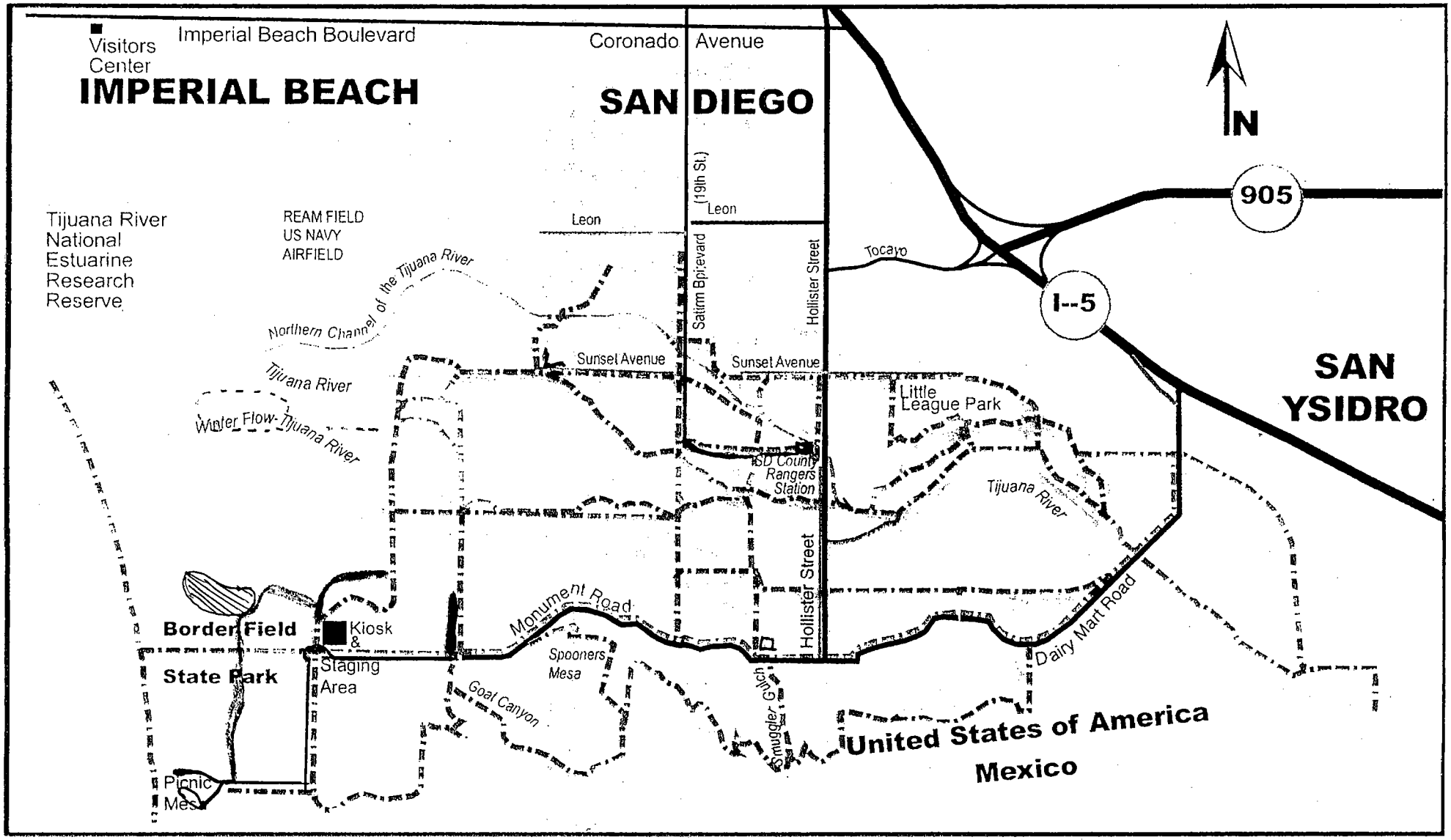
City of San Diego. 2004. Notice of Preparation of a Draft Environmental Impact Report. San Diego County Department of Parks & Recreation. San Diego CA

County of San Diego. 1998. Final Multiple Species Conservation Plan. San Diego CA.

County of San Diego 1998. Memorandum of Understanding for Inter-Agency Trail Coordination (MOU). San Diego Ca.

Department of the Interior (1997). Interior Secretary Praises MONUMENTAL CONSERVATION ACHIEVEMENT" IN SAN DIEGO COUNTY [Electronic version]. Retrieved October 21, 2004 from http://www.doi.gov/news/archives/sand.html

Fish and Wildlife Service. 1998. Draft Recovery Plan for the Least Bell's vireo. U.S. Fish and Wildlife Service, Portland OR.



Approved Trails

Tijuana River

Map Graphics by Carolyn Powers

Approved Trails determined by the Round Table Trails Sub Committee under authority of the Tijuana River National Estuarine Research Reserve Management Authority. Participating committee members included: San Diego County Department of Parks & Recreation, California State Parks & Recreation, US Fish & Wildlife, State Coastal Conservancy, State Coastal Commission, US Navy, Citizens Against Recreational Eviction and Tijuana River Valley Equestrian Association.

RECEIVED
OCT - 1 2004
STATE CLEARING HOUSE
2004091159

NOTICE OF PREPARATION

To: Director / Senior Planner
OPR / State Clearinghouse
1400 Tenth Street, Suite 222
Sacramento, California 95814
916-445-0613

From:
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

The San Diego County Department of Parks and Recreation will be the Lead Agency under the California Environmental Quality Act (CEQA) and will prepare an environmental impact report (EIR) for the Tijuana River Valley Regional Park Trails and Enhancement Project (Proposed Project).

We need to know the views of your agency as to the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connections with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project. The project description, location, and list potential environmental effects are included in this Notice of Preparation (NOP).

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than November 4th, 2004. Please send your response to the NOP to the attention of:

Maeve Hanley, Environmental Resource Manager
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123
(858) 694-2968 (Telephone)
(858) 495-5841 (Facsimile)

PROJECT TITLE: TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT

PROJECT APPLICANT: SAN DIEGO COUNTY DEPARTMENT OF PARKS AND RECREATION

Date: September 28, 2004 Signature:

Title: Renee Bahl, Director

Telephone: (858) 695-2968

#2004091159 Notice of Preparation

Tiny little valley approx. 3 miles long and 1 mile wide within a 10 year flood plain. It (the valley) is bisected by a river of sewage which flows out from Tijuana, Mexico and empties into the National Estuary and stinks most of the year. Biggest reason for low useage park!

PROJECT DESCRIPTION:

The County of San Diego (County) is proposing to implement a Trails and Habitat Enhancement Project (Proposed Project) in the Tijuana River Valley Regional Park. The Proposed Project is intended to refine and permit a network of multi-use recreational trails, which will facilitate recreational access and allow for the rehabilitation of degraded natural habitats within the Tijuana River Valley Regional Park. The Proposed Project includes the following specific components: Unsightly past sand mining areas. Spoiled views of trash piles and rock quarries and much dumping of human garbage & furniture.

- Creation of a formally designated multi-use recreational trail network; Open 1¼ mi of new road!? Close 4 mi of Horse trails.
- Habitat creation and (restoration) of approximately 60-acres including wetland, riparian and upland habitats; ? More sand mining and quarry permits to friends? Perhaps another phony, fake water district board of fri
- Installation of a steel-truss recreational bridge crossing over the Tijuana River; Will it withstand a 10ye major flood?
- Interpretive/directional signage and benches at key areas; ? For whom?
- Bird observation blinds and trail fencing; ? So only Renee Bahl & co-workers can enter? Perhaps we all can play GOD!
- Eastern trailhead staging area consisting of 2-acres along Dairy Mart Road; For whom?
- Creation of a park management plan to guide the long-term development and management of uses and resources within the Tijuana River Valley Regional Park.
- Vote --- NO PROJECT ALTERNATIVE If it isn't broke --- Don't fix it!

Currently, there is no recreational trail network permitted through the California Environmental Quality Act in the Tijuana River Valley Regional Park (TRVRP). The Proposed Project would utilize selected portions of existing dirt roads and pathways and includes realignments, enhancements and closures where haphazard and unplanned development of trails has resulted in habitat degradation, deterioration of the quality of natural resources, and declining recreational user experience in the TRVRP. Minimal new trails and trail linkages would be developed as part of the Proposed Project. There was an MOU in the recent past with all parties in agreement and signing. Why this smoke screen again NOW by county heads? Why wasn't all parties to the MOU invited to the scoping meeting and more notice given? Why the Big Push --- Rush?

PROJECT LOCATION: County Park is surrounded on three sides by housing with ocean to west, Mexico to the south!

The Proposed Project is located in the County of San Diego's Tijuana River Valley Regional Park located in the City of San Diego (Exhibits 1 and 2) in the southwestern portion of San Diego County. The TRVRP is generally bounded on the east by Dairy Mart Road (except for a portion of the Dairy Mart Ponds that extend further east), the Tijuana River Estuary on the west, the US / Mexico international border on the south, and Sunset Avenue and the residential community to the north. * Neighbors Naval airfield - Helicopter exercises/training daily to North Border Patrol - Quad Squad & Horse patrol to North Talk about! Noise.

The TRVRP consists of a total of 1,800 acres of which 1,638 acres are owned by the County. The other landowners in the TRVRP include the City of San Diego and the California Department of Fish and Game. Private owner The TRVRP is bisected from north to south by the east-west flowing Tijuana River originating in Mexico and draining to the Pacific Ocean through the Tijuana River National Estuarine Research Reserve located west of the TRVRP.

* Stinks * Unsightly * Bombarded by Helicopters
* Dump * Next to Mexico * Illegals
Horses Love It! - We try to clean it! Patrol it

POTENTIAL ENVIRONMENTAL EFFECTS:

Based on a preliminary assessment of potential environmental effects associated with implementation of the Proposed Project, the following issues are anticipated to be further analyzed in the EIR: or else shrunk down from view so as to be hidden from all possible agency, departmental, and public opinion or scrutiny. We will slide it past recognition.

- Aesthetics / Visual Resources Unsightly permitted sand mineing and rock quarries by county.
- Agricultural Resources Farming to Willow trees that are again fenced - caused by county land buy-outs they call "habitat Restoration".
- Air Quality "Sewer River" stinks from Tijuana to the Pacific.
- Biological Resources It takes much money to support the degree's harbored in Administra
- Cultural Resources Horses have been a huge part of this valley's heritage since 18(I wish your grandchildren + mine to share this healthy experienc
- Geology / Soils I pray they choose horses over playgrounds of drugs + gangs.
- Hydrology / Drainage / Water Quality Don't even get me started! Not even serious.
- Land Use and Planning Leave people here alone. They managed for two centu without you or Administration!
- Noise Quarries, tractors, Helicopters, Quads, traffic, Birds, Children, County
- Public Health and Safety / Hazardous Materials Sewer river contains over thirty disepses and their strains - leprosy, Hiv, Hepatitis, tuberculosis, to name a few.
- Public Services and Utilities
- Transportation / Circulation Parks and Rec. Administration say Horses damage trails an yet drive tractors and trucks on these very same horse trails, to do dredging surveilance, habitat restoration, river reed demolition, small flood or rain repairs are rarely if ever mentioned as even being damage potential possibilities. Recreation Administration -- you continue to bend facts and leave out valuable information in a dirty effort to control or fence this valley, with you holding the so called only key to its use and passage. You are not our GOD! Incidently your co-workers are also watching and forming opionions of you. Does this make you comfortable? What comes around goes around! "stuff" rolls down hill!!!

- Trails - Why are over fourty miles of trail -- most of which are shaded, cooled, protected by trees and brush being closed and fourteen new miles of multi use, sneaking, road attempting to be O.K'd by EPA - Environmental Protection Agency. I do not expect EPA to be fooled by this one sided presentation and many to invite the EPA down here to check it out personally for themselves, to form their own conclusions.
- Planning/Creating: Building anything in a Ten year Flood Plain leaves potential for claims of government waste or abuse and for good reason, not your job security! It's Wrong.
- Fences: Who says birds have priority over animals? When has fencing ever helped wildlife or birds?
- Money: $570 million dollars have been spent in the last 10 years right here in this tiny valley." Supervisor Greg Cox My question is where? Show Us the Money! results

(over)

live here. Their numbers are increasing despite competition from numerous other birds, fish, animals, horses, county operations, sand mineing, quarries, rains, draughts, helicopters, bird watchers, and even humans! Someone watches over all

- Wildlife: 3 bobcat, 2 pair of fox, approx. 10 coyote, raccoon, opossum, squirrels to name some. We also have visits of 3 golden eagles, northern Harriers, many kinds of hawks and falcons, song birds ... you name it! PLEASE no more trapping, and Lethal Removals (killing) of this wildlife! I for one question your motives.

- Somethings here are going right!!!

- Not everyone wants a cookie cutter park of ballfields, soccer fields, skate ramps, swing sets, designated parking or potential drug dealing and gang hangouts. If you do --- come downtown --- take my place.

Please

- Vote --- No Project Alternative.

Dianne Porter
1976 Grove Ave
SD, CA 92154

UNITED STATES POSTAL SERVICE
0000

AMOUNT $1.06

Ms. Maeve Hanely
SD Dept. of Parks &
5201 Ruffin Road, Su
SD, CA 92123

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

diana.geisler@navy.mil
e-mail address (optional)

DIANA GEISLER
Name

TREVEA
Organization

906 21ST ST #11
Street Address

619-556-7404
Daytime Phone No. (optional)

SAN DIEGO
City

CA
State

92102
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

- IT IS A TRAGEDY & PREPOSTEROUS THAT NO ONE IN THE DECISION MAKING & PLANNING OF MULTI TRAILS BUILDERSTANDS THAT HIKERS/BIKER/HORSES DO NOT MIX. HORSES BY THEIR VERY NATURE ARE FRIGHTENED BY MECHANICAL EQUIPMENT COMING UP BEHIND THEM, OR APPROACHING THEM, ENDANGERING HORSEBACK RIDERS. THERE IS NO CONSIDERATION IN THIS PLAN FOR SERIOUS EQUESTRIANS.
- HORSE DROPPINGS FERTILIZE NATURAL TRAILS & ENHANCE THE NATURAL PROCESSES - HOW WILL HORSE DROPPINGS ENHANCE A PAVED TRAIL & ENHANCE THE EXPERIENCE OF HIKERS & BICYCLISTS?
- HOW CAN SO FEW MILES OF TRAILS HANDLE THE VOLUME OF MULTI-USERS?
- THIS PROPOSAL MAKES EQUESTRIANS THE BIGGEST LOSERS OF ALL.

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

DEPARTMENT OF TRANSPO[illegible]TION
District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299

State of California
Department of Transportation
District 11, MS-50
2829 Juan Street
P.O. Box 85406
San Diego, CA 92186-5406

Caltrans

Flex your power!
Be energy efficient!

Brent C. McDonald
Assoc. Transportation Planner
Development Review
(619) 688-6819
Fax: (619) 688-4299
brent.mcdonald@dot.ca.gov

November 2, 2004

11-SD-005
PM 2.31

Ms. Maeve Hanley
SD County Dept. of Parks & Recreation
5201 Ruffin Road, Suite 'P'
San Diego, CA 92123

RE: NOP for a Draft EIR – Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (SCH 2004091159)

Dear Ms. Hanley:

The California Department of Transportation (Department) appreciates the opportunity to review the Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project, located immediately west and south of Interstate 5 (I-5) at Dairy Mart Road. In general, the Department supports the County's plans to construct a network of safe, continuous, interconnected trails in order to allow residents to choose alternative modes of transportation. An interconnected trail network may help to increase mobility and reduce traffic and congestion on local roads and State transportation facilities by providing functional alternatives to the automobile. In addition, trails can have a positive effect on residents' "quality of life" by providing convenient and safe recreational opportunities.

Department Deputy Directive 64 (DD-64, "Accommodating Non-Motorized Travel") supports the development of non-motorized facilities and access along Caltrans Right of Way (R/W). However, any work that may involve access, storage, staging, or other activities occurring within Department R/W will require an encroachment permit. Furthermore, the indirect effects of any mitigation within Department R/W must be addressed. The developer will be responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and/or resource agencies. For example, the applicant would need to obtain a Coastal Development Permit for work within the R/W at I-5 / Dairy Mart Road prior to the Department's issuance of an encroachment permit. Information regarding encroachment permits may be obtained by contacting the Permits Office at (619) 688-6158. Early coordination with the Department is strongly advised for all encroachment permits.

It is important to design trails with the user in mind. If multipurpose trails are primarily to serve bicycle travel, then they should be developed in accordance with standards for Class I Bikeways. However, use of trails can vary from recreational, hiking, shared-use, bike, mountain bike, equestrian, all terrain vehicles (ATVs), off-highway vehicles, and motorcycles. Caltrans Highway Design Manual (HDM) Chapter 1000 provides guidance for the planning and design of non-motorized facilities and access. For any non-motorized facilities to be located within Department R/W, the design guidelines set forth in HDM Chapter 1000 must be adhered to. Design standards for multipurpose trails are discussed in Section 1003.5. The HDM Chapter 1000 (Bikeway Planning and Design) may be found on the internet at URL: http://www.dot.ca.gov/hq/oppd/hdm/pdf/chp1000.pdf

The US Department of Transportation (USDOT) / Federal Highway Authority (FHWA) provides guidance on Trail Planning and Design as well as conflicts encountered in trail design. The publication entitled *Designing Sidewalks and Trails for Access* can be found on the web at the following URL: http://www.fhwa.dot.gov/environment/bikeped/access-1.htm In Chapter 5, entitled "Trail Design for Access," FHWA discusses conflicts encountered in trail design such as access control, built facilities along trails, trails amenities for multiple user groups, drainage control measures, complying with design standards including ADA, difficulty ratings for trails, etc.

The entrances and exits to and from paths / trails can sometimes create conflicts in crossing, especially in or near urban or community areas. Bollards may be placed at entrances and exits to/from paths to keep vehicles from entering paths. Trail signs can help show users appropriate trail etiquette. Right of way / yield signs – showing bikes yielding to hikers, and both bikes and hikers yielding to equestrians – are fairly standard on multi-use trails.

Thank you for the opportunity to review this project proposal. For questions regarding the Department's non-motorized program, please contact Dan Gallagher at (619) 688-2597 or James Floyd at (619) 688-3140. For specific questions regarding I-5 South, please contact Erwin Gojuangco at (858) 616-6671. For specific questions regarding Environmental issues, please contact Jason Reynolds at (858) 616-6609. If you have general questions on the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,

for MARIO H. ORSO, Chief
Development Review Branch

cc:	BMcDonald	Planning	MS-50
	JReynolds	Environmental	MS-46
	DGallagher	Non-motorized	MS-50
	SMorgan	State Clearing House	

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION
DISTRICT 11
P.O. BOX 85406
SAN DIEGO, CA 92186-5406

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Ms. Maeve Hanley
SD County Dept. of Parks & Rec.
5201 Ruffin Rd., Ste. P
San Diego, CA 92123

92123+1653

Please fold in thirds, staple and affix postage.

Denny Jurgens
3275 C St 210
S.D. 92102

SAN DIEGO CA 921
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Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

e-mail address (optional)

Denny Jurgens
Name

American taxpayer / voter
Organization

3275 C st. 210
Street Address

619-501-4515
Daytime Phone No. (optional)

San Diego
City

CA
State

92102
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

This project is proposed for AND within A ten year flood plain. Isn't this considered government waste + abuse ? I'll ask Washington

In the past ten years approximately $570 - five hundred seventy million dollars have been spent in this tiny valley! Has most been flooded away? Where is the money ? Perhaps our media will know!

Why are ~~fourty~~ one miles of trails being closed AND fourteen opened to Multi use? Does someone have the ball to say birds have priority over animals? Why more fences? If not broke - Don't fix it! I vote - No Project Alternative!

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Three miles long - One mile wide ! 1800 acres.

Comments must be received by November 4, 2004.

Fax 858-495-5138 (or mail, see over)

STATE CAPITOL, ROOM 2082
SACRAMENTO, CA 95814
PH (916) 445-6767
FAX (916) 327-3522

CHULA VISTA OFFICE
637 3RD AVENUE, SUITE C
CHULA VISTA, CA 91910
PH (619) 409-7690
FAX (619) 409-7688

IMPERIAL VALLEY OFFICE
1224 STATE STREET, SUITE D
EL CENTRO, CA 92243
PH (760) 335-3442
FAX (760) 335-3444

COACHELLA VALLEY OFFICE
53990 ENTERPRISE WAY, SUITE 14
COACHELLA, CA 92236
PH (760) 398-6442
FAX (760) 398-6470

California State Senate

SENATOR
DENISE MORENO DUCHENY
FORTIETH SENATE DISTRICT

COMMITTEES
CHAIR, HOUSING & COMMUNITY DEVELOPMENT
AGRICULTURE & WATER RESOURCES
BUDGET & FISCAL REVIEW
BANKING, COMMERCE & INTERNATIONAL TRADE
JUDICIARY
VETERANS AFFAIRS
SUBCOMMITTEE
BUDGET SUBCOMMITTEE NUMBER 4: LEGISLATIVE, EXECUTIVE, JUDICIARY, TRANSPORTATION AND GENERAL GOVERNMENT
SELECT COMMITTEES
CHAIR, OVERSIGHT OF THE DEPARTMENT OF ENERGY LABORATORIES OPERATED BY THE UNIVERSITY OF CALIFORNIA
MOBILE AND MANUFACTURED HOMES
JOINT COMMITTEE
PREPARING CALIFORNIA FOR THE 21ST CENTURY
MEMBER, COMMISSION OF THE CALIFORNIAS

FAX TRANSMISSION COVER SHEET

DATE: 11/4/04 FROM: Jonathan Hardy

TO: Maeve Hanley

PAGES INCLUDING COVER SHEET: 3

ADDITIONAL INFORMATION: TRV - Notice of Preparation letter
- Hard Copy to follow.

2004 NOV 4 AM 10 41

If transmission is not complete, please call (619) 409-7690

COMMITTEES
CHAIR, HOUSING & COMMUNITY DEVELOPMENT
AGRICULTURE & WATER RESOURCES
BUDGET & FISCAL REVIEW SUBCOMMITTEE #4
BANKING, COMMERCE & INTERNATIONAL TRADE SUBCOMMITTEES:
ASIAN TRADE & COMMERCE
CA-EUROPEAN TRADE DEV
JUDICIARY
VETERANS AFFAIRS

California State Senate

SENATOR
DENISE MORENO DUCHENY
FORTIETH SENATE DISTRICT

SELECT COMMITTEES
CHAIR, CALIFORNIA-MEXICO COOPERATION
CHAIR, OVERSIGHT OF UC DEPT OF ENERGY LABORATORIES
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FISCAL RESTRUCTURING
IMMIGRATION AND THE ECONOMY
MOBILE AND MANUFACTURED HOMES
JOINT COMMITTEE
PREPARING CALIFORNIA FOR THE 21ST CENTURY
MEMBER, COMMISSION OF THE CALIFORNIAS

November 3, 2004

Maeve Hanley, Environmental Resource Manager
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

RE: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (NOP)

Dear Ms Hanley:

I am writing to express my concerns about the proposed Tijuana River Valley Trails and Habitat Enhancement Project as presented on October 25, 2004. The County of San Diego's of Tijuana River Valley (TRV) is comprised of agricultural, biological, cultural and historical resources and recreational opportunities. Together they play an important role in the vitality and history of the region.

The TRV has a long history of agricultural production within its borders. Based on a March 31, 1953 photograph provided by the Natural Resources Conservation Service, agricultural production comprised over 90% of the TRV's land use. The further reduction of agricultural land proposed by this project would negatively affect the long agrarian history of the region. Scientific and amateur wildlife enthusiasts have documented the usage of farmlands as resting and feeding grounds for migratory birds. Reducing this important resource for migrating animals would be a tragedy.

The proposed project's environmental habitat and biological resources restoration plan is ambitious. The restoration of native species habitat is extremely important to the region and state. As we are all fully aware, the TRV is an endangered species and sensitive habitat area, surrounded by burgeoning development. The County of San Diego should implement protections to preserve and protect the land, while at the same time allowing for both active and passive recreation.

CAPITOL OFFICE
STATE CAPITOL, ROOM 2062
SACRAMENTO, CA 95814
PH (916) 445-0767
FAX (916) 327-3522

CHULA VISTA OFFICE
637 3RD AVENUE, SUITE C
CHULA VISTA, CA 91910
PH (619) 409-7690
FAX (619) 409-7688

IMPERIAL VALLEY OFFICE
1224 STATE STREET, SUITE D
EL CENTRO, CA 92243
PH (760) 335-3412
FAX (760) 335-3444

COACHELLA VALLEY OFFICE
53990 ENTERPRISE WAY, SUITE 14
COACHELLA, CA 92236
PH (760) 398-6442
FAX (760) 398-6470

The County of San Diego has the responsibility to balance its preservation actions with that of recreational usage. Recreational uses, including horseback riding, hiking, and bicycle riding are important to the history as well as the future of the valley. The TRV is one of the last locations within California that equestrians can ride through coastal chaparral to the Pacific Ocean. As an equine supporter, I must express my concern about the proposed multi-use trail. Horses in all of their strength and great size are still prey animals, and can be extremely "skittish" when startled. The proposed multi-use trail can potentially create unsafe riding conditions for the horses, pedestrians, hikers and bike riders.

Of particular concern to local equestrians is the interaction between bicyclists and horses. There ought to be a way to make a trail that reduces the bike/horse interaction, while still reducing the redundancy of trails within the valley.

The need to balance all of the agricultural, biological, cultural and recreational opportunities in the valley is critical. The current plan restricts the parks' usage to primarily environmental protection. Environmental habitat is important, but there needs to be a balance between all of the current and future uses within the TRV.

I look forward to your responses to these concerns.

Sincerely,

Denise Moreno Ducheny
State Senator, 40th District

DMD/jmh

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

EggerSwissfarms@aol.com
e-mail address (optional)

David Egger
Name

Resident, Farmer
Organization

1701 Saturn Blvd
Street Address

(619)840-1470
Daytime Phone No. (optional)

San Diego
City

CA
State

92154
Zip Code

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

My family has lived and farmed in the Tijuana River Valley since the late 1800's. Our climate is like no other in the nation and gives the ability of farmers to grow most crops year round. At one time 90% of the proposed project area was actually farmed.

This project has almost completely eliminated **farmland** from it's plans. County Supervisor **Greg Cox** stated that the preservation and promotion of **Agriculture** is important. **So where is it?** There is still potentially a decent amount of land left for Agriculture. The Disney property, Spooners Mesa, The Roberts Property, and the Effie Mai Property. Please consider leaving this small amount of land available for **farming**. You take this away and it is a loss to all of us, as we become more dependent on imported produce. Thank You, David Egger

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

	e-mail address (optional)
David E. Brown	**U.S. Border Patrol**
Name	**Organization**
1802 Saturn Blvd.	**(619)662-7057**
Street Address	**Daytime Phone No. (optional)**

SAN DIEGO	**CA**	**92154**
City	**State**	**Zip Code**

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

(Please see attached response)

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

U.S. Customs and
Border Protection
P.O.Box 68
Imperial Beach, CA 91933

October 25, 2004

Renee Bahl
San Diego County Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

Re: Response to Notice of Preparation

Dear Ms. Bahl:

This is in response to the Notice of Preparation for the proposed Trails and Habitat Enhancement Project in the Tijuana River Valley Regional Park [TRVRO] as put forth by the San Diego County Department of Parks and Recreation.

Mission and Authority

The mission of the United States Border Patrol is to safeguard the American homeland at and beyond the borders. The Border Patrol's primary responsibility is protecting the public against terrorists and the instruments of terror. The Border Patrol enforces many federal laws most of which are directly related to immigration. Congress has given the Border Patrol statutory authority to access, without a warrant, public and private lands within 25 miles of the border for the purpose of patrolling the border and conducting such activities as are customary, or reasonable and necessary to prevent the illegal entry of aliens into the United States of America. (8 U.S.C. 287, 1324, and1357)

Border Operations

The Imperial Beach Border Patrol Station conducts continuous operations within the area of the proposed TRVRP Habitat Enhancement Project. The station has

consistently deployed its agents in close proximity to the international boundary to deter illegal entry into the United States. Forward deployment has been the most effective enforcement strategy with the border infrastructure, as it currently exists. Agents in four-wheel drive and all terrain vehicles perform regular patrol duties using established border roads. These duties include high profile observation, sign cutting/tracking, and the interception and detention of criminal suspects.

Most border enforcement activities are conducted south of Monument Road where there is a good system of redundant north/south and east/west grid pattern of roads. However, Border Patrol Agents will work north of Monument Road when suspects are detected in the area. The landscape north of Monument is less conducive to efficient operations because of fewer roads and heavily wooded areas.

Impact of Proposal

Accessibility is one of the most critical needs for the Border Patrol in the area of the proposed project. Our operational aim is to be proactive rather than reactive. The current redundant pattern of roads allows us to be proactive and prevent illegal entries by assuming a deterrence posture or effecting an immediate apprehension after entry. Therefore, any new restrictions or road closures in areas north or south of Monument would impact operations in the most adverse way. Without this network of roads the agents lose the advantage and enforcement becomes infinitely less effective and more difficult. The consequences of failing to stop illegal entries at the border will negatively impact the Tijuana River Valley and local communities. (See exhibits A, B, and C)

Quality of Life in Local Community Affected: If the Border Patrol is denied the opportunity and mobility afforded by the present road system, alien and drug smuggling is less likely to be confined to the unpopulated areas near the border fence where an ever-present force of mobile agents is concentrated. This illegal activity would soon be seen on the streets, alleys, and backyards of neighborhoods in the City of Imperial Beach and the community of Nestor. People living in the neighborhoods west of Dairy Mart Road would be affected in the same way. The safety of those enjoying the recreational opportunities offered in the Tijuana River Valley would be jeopardized as smuggling and other illegal activity took place along trails and staging areas.

Migrants Victimized on U.S. Soil: A greater number of people seeking to enter the U.S. illegally will be attracted to the area if the Border Patrol's effectiveness diminishes due to road restrictions and closures. What occurred here during the middle to late 1980's and early 1990's prior to Operation Gatekeeper will likely occur again. During that period there was an unprecedented wave of crime and

violence near the border. This was the result of the presence of thousands of people congregating and traversing through areas of limited access. Areas where only trails existed became havens for bandits who preyed on the unsuspecting. Criminal activity such as armed robbery, rape, and murder were commonplace in the area of Spooner's Mesa, the Tijuana River bottom, Smugglers Gulch, and to the east. Even today, bandit activity on the U.S. side is rampant near the border in parts of Arizona. This is directly related to the large groups of people crossing illegally and the lack of adequate access to the border in many places. Again we would see the return of large numbers of people to this part of the border and the crime that goes with it. (See exhibits D, E, F, G, and H)

Environmental Degradation: During the period just prior to Operation Gatekeeper at least one-half million people crossed the border illegally every year between Border Field State Park and the San Ysidro Port Of Entry. Many undesirable conditions existed here as a result of this mass influx. This was clearly evidenced in the overall environmental degradation of the Tijuana River Valley. The many people transiting the area created trails and lay-up spots littered with clothes, plastic, paper, and human waste. Campfires and cigarettes started numerous brush fires. Even more tragic was the loss of human life when people attempted to cross the swift waters of the Tijuana River during years of heavy rain.

Summary

The United States Border Patrol is not opposed to many aspects of the enhancement project under consideration. Many components of the project do not reduce the efficiency of Border Patrol operations in any significant way. The Border Patrol is very concerned about possible road closures or road restrictions north and south of Monument Road under this proposal. The negative result of this action to the community and possibly to the nation cannot be overstated. This is still a very active border area. In FY 2004, the Imperial Beach Border Patrol Station made over 8,000 apprehensions including nearly 170 felony criminal arrests. Half of the total apprehensions occurred within the boundaries of the TRVRP. Some of those apprehended have been from "special interest" countries, that is countries the Department of Homeland Security has deemed as having some nationals who are a potential terrorist threat to the United States. America is engaged in a global war on terror. Its enemies are looking for the opportunity to penetrate the borders to hurt America's people and economy.

The Border Patrol urges the San Diego County Department of Parks and Recreation to keep open all existing roads in the Tijuana River Valley Regional Park. It strongly recommends against any plan to narrow, block, or gate these roads. Actions of this sort would effectively dismantle Operation Gatekeeper in

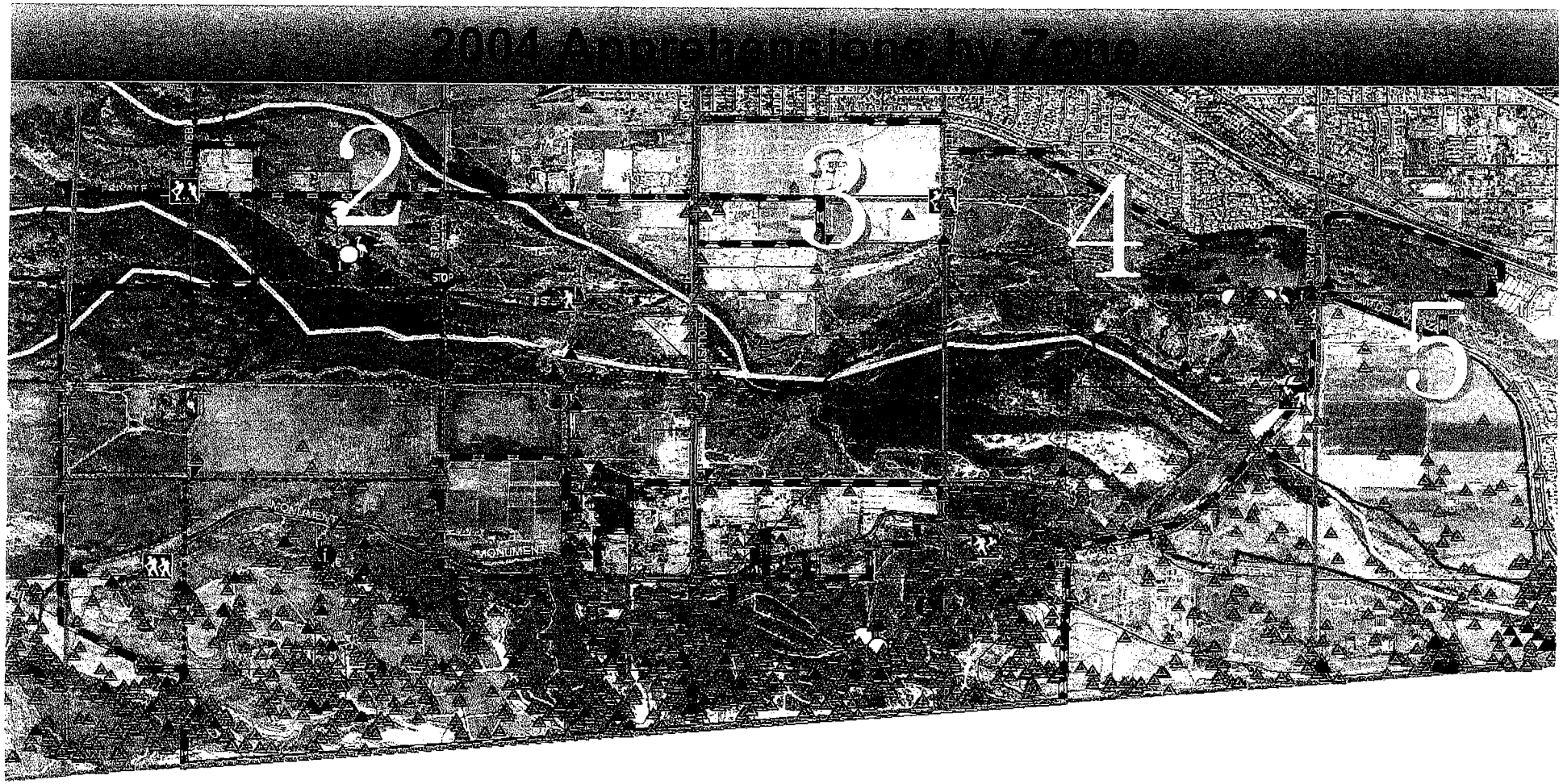
this part of the border. (See exhibits I, J, and K) The Border Patrol recommends the use of signs to restrict vehicle access to the public on Regional Park roads if the goal is to limit motorized access.

The United States Border Patrol looks forward to working with your department on this issue. Please contact us if you have any questions.

Sincerely,

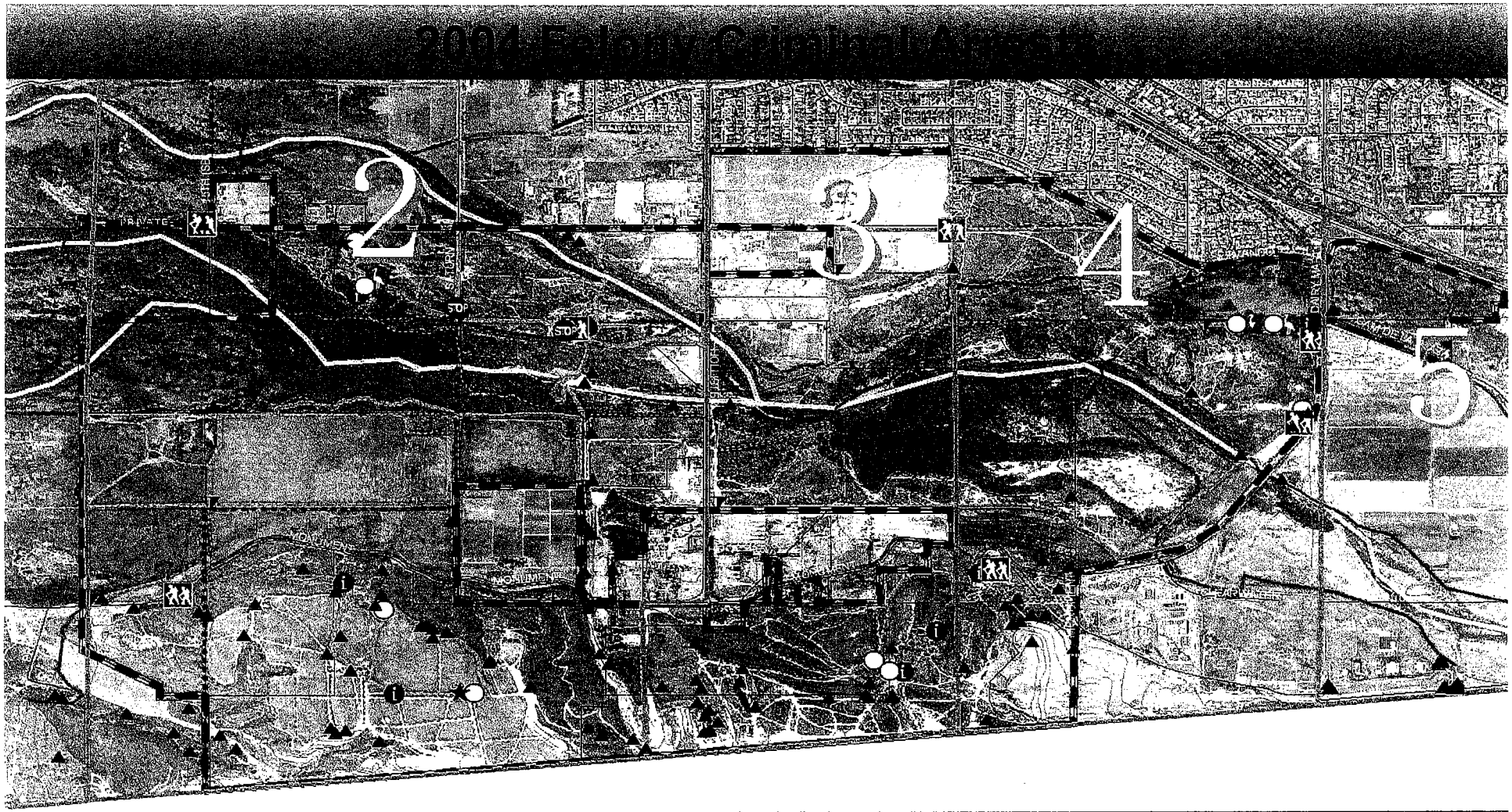
David E. Brown
Patrol Agent In Charge

Attachments (11)



In this overlay of the TRVRP, each blue triangle represents the point of apprehension of an individual or groups of individuals that have crossed the U.S. border illegally during FY 2004. Border Patrol records show 4,217 apprehensions for this period in the enforcement zones depicted above.

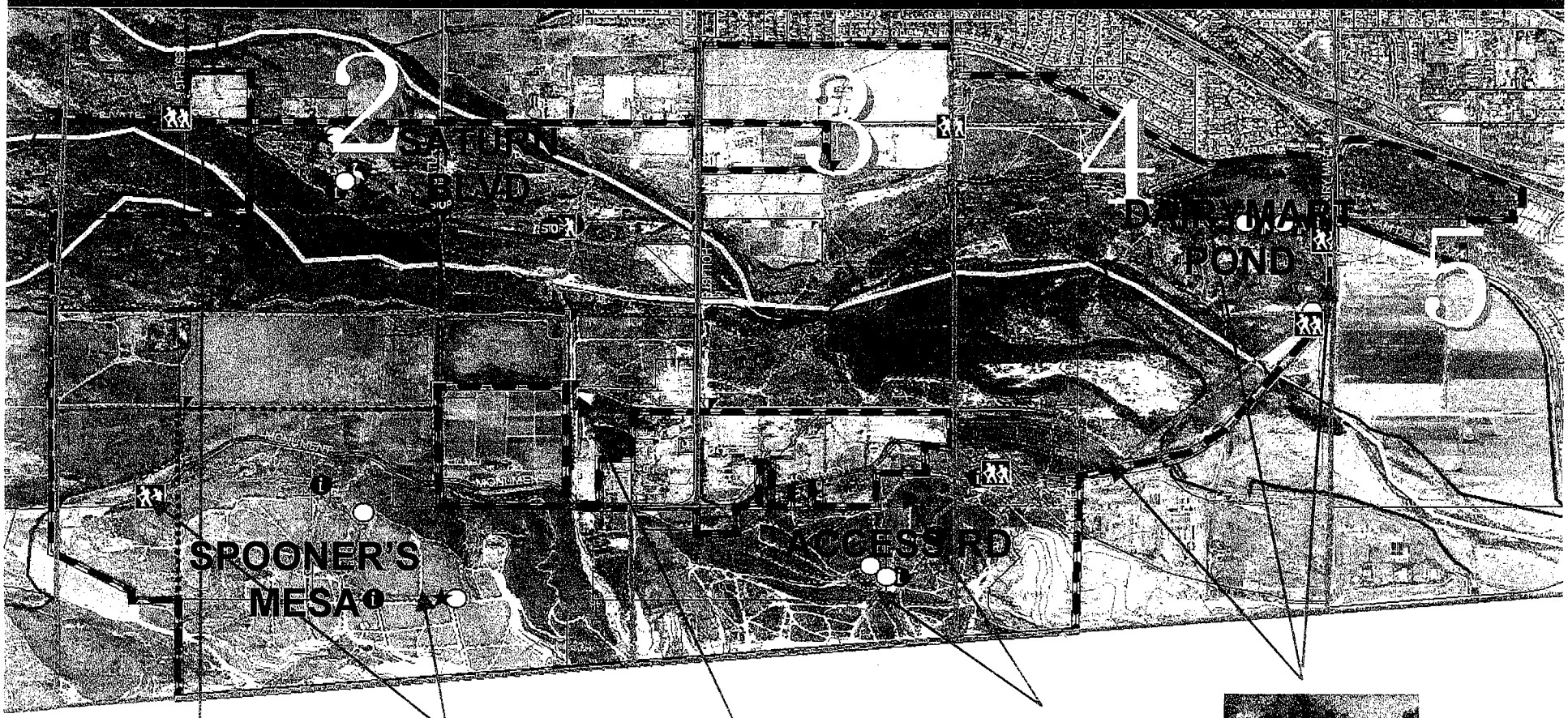
EXHIBIT A

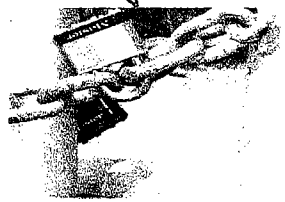


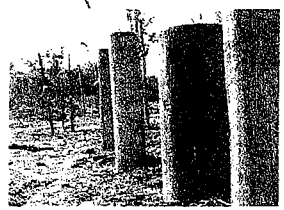
In this overlay of the TRVRP, each red triangle represents the point of apprehension made on criminal felons that crossed the U.S. border illegally during FY 2004. Border Patrol records show 167 apprehensions for this period in the enforcement zones depicted above.

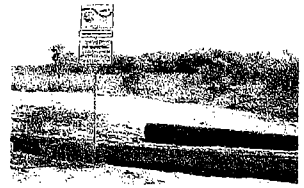
EXHIBIT B

Proposed Road Closures Would Adversely Impact Border Patrol Operations









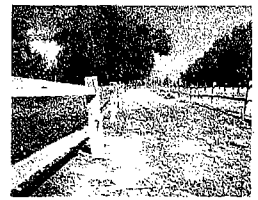


EXHIBIT C

OPERATION GATEKEEPER

Imperial Beach Station
Yearly Apprehension

1992	202,372
1993	165,514
1994	187,019
1995	120,644
1996	74,982
1997	27,865
1998	15,832
1999	15,974
2000	19,815
2001	15,480
2002	11,407
2003	10,266
2004	8,351

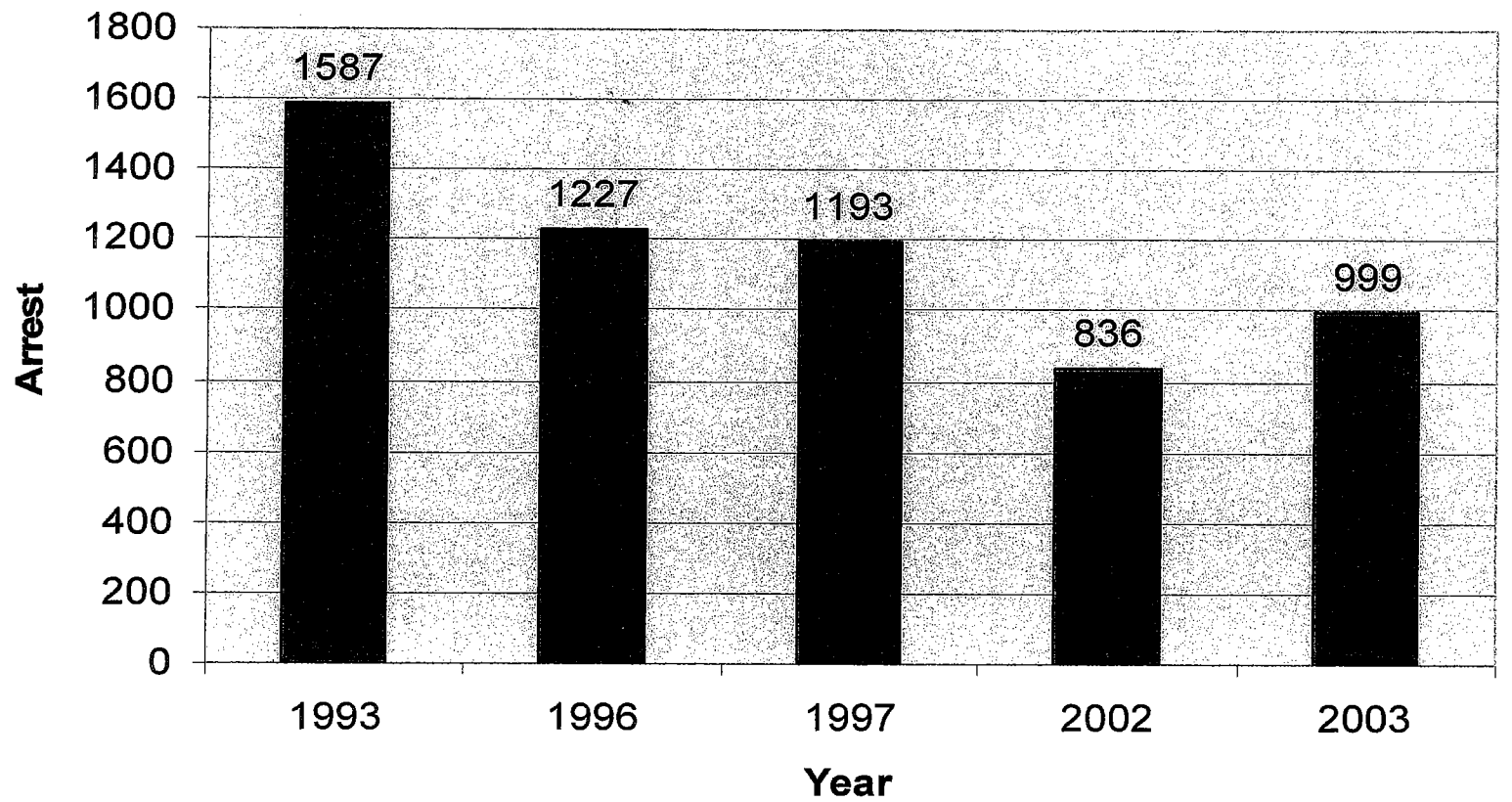
Primary Border Fence and Road Enhancements Begin

First Year of Operation Gatekeeper Yields Dramatic Results

The continued success of Operation Gatekeeper is seen in the yearly decline of apprehensions in the Imperial Beach Station area of operations. The U.S. Border Patrol's Imperial Beach Station is responsible for the land border between the the Pacific Ocean and the San Ysidro Port Of Entry. The Tijuana River Valley Regional Park covers nearly half of the Imperial Beach Station's area of operations.

EXHIBIT D

Imperial Beach Sheriffs Crime Statistics

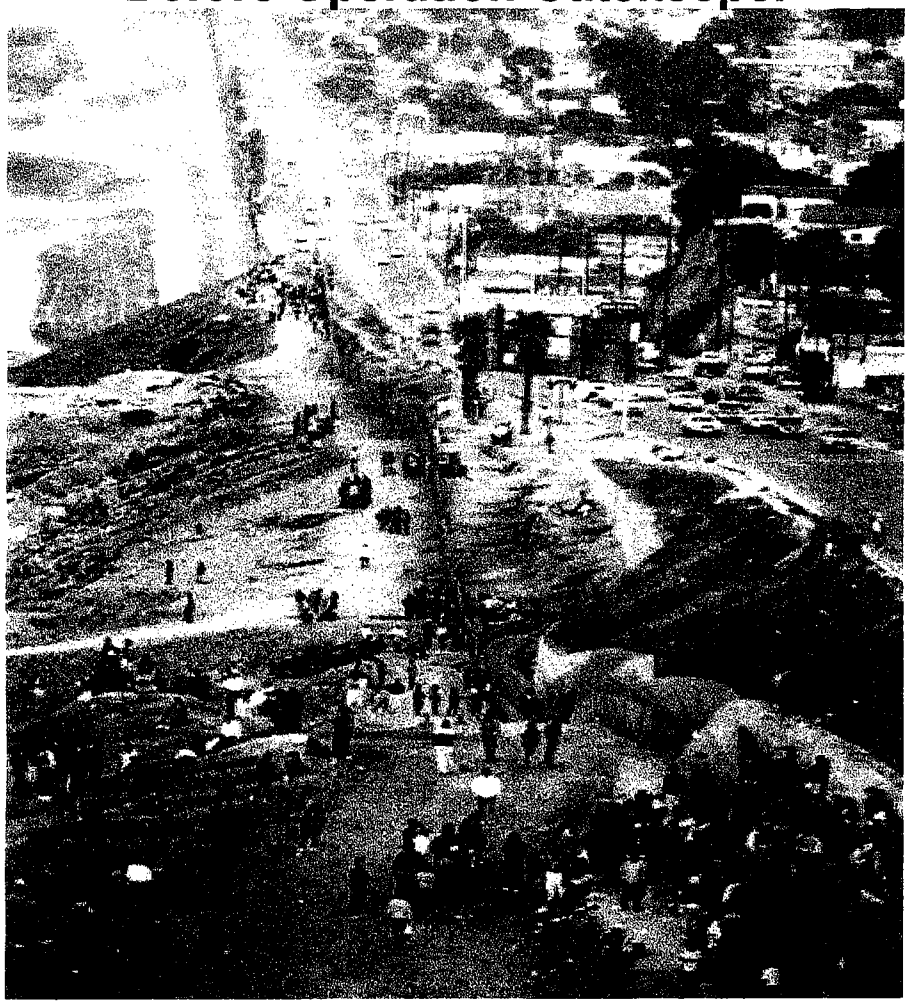


[redacted]

EXHIBIT E

Eastern Edge of IBWRP at the Border

Before Operation Gatekeeper



After Operation Gatekeeper

EXHIBIT F

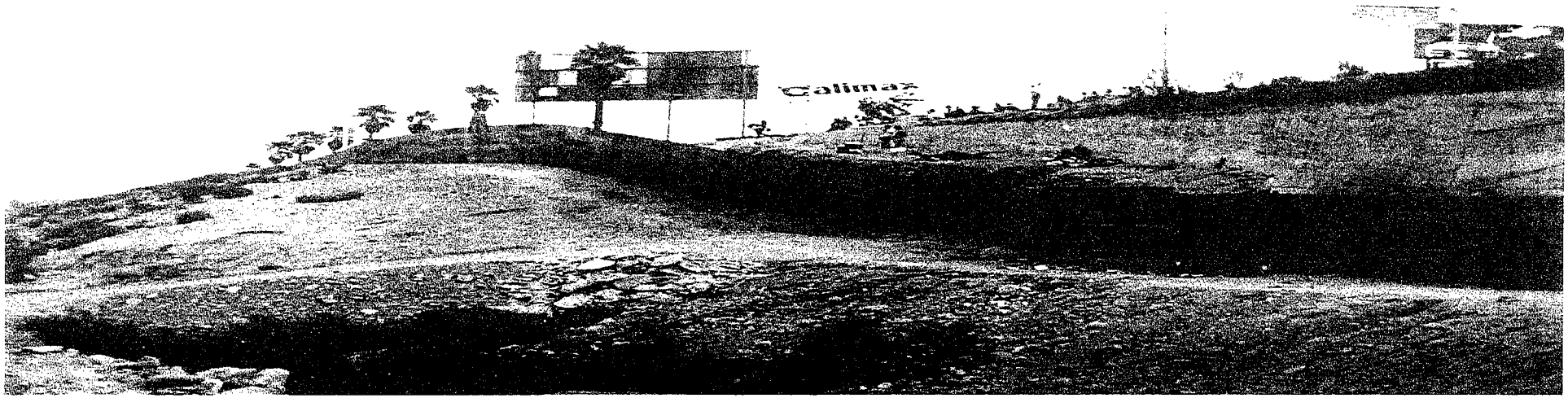


EXHIBIT G

Impact of Operation Gatekeeper on the TRVRA Area

Before Operation Gatekeeper

After Operation Gatekeeper

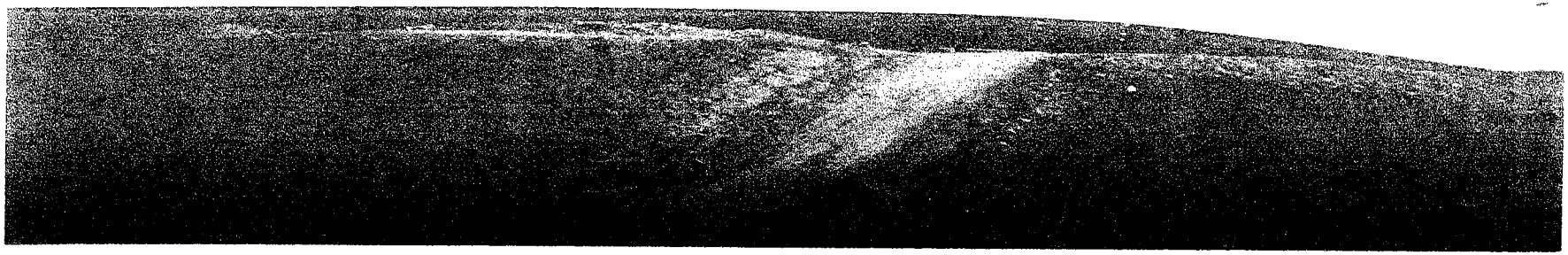
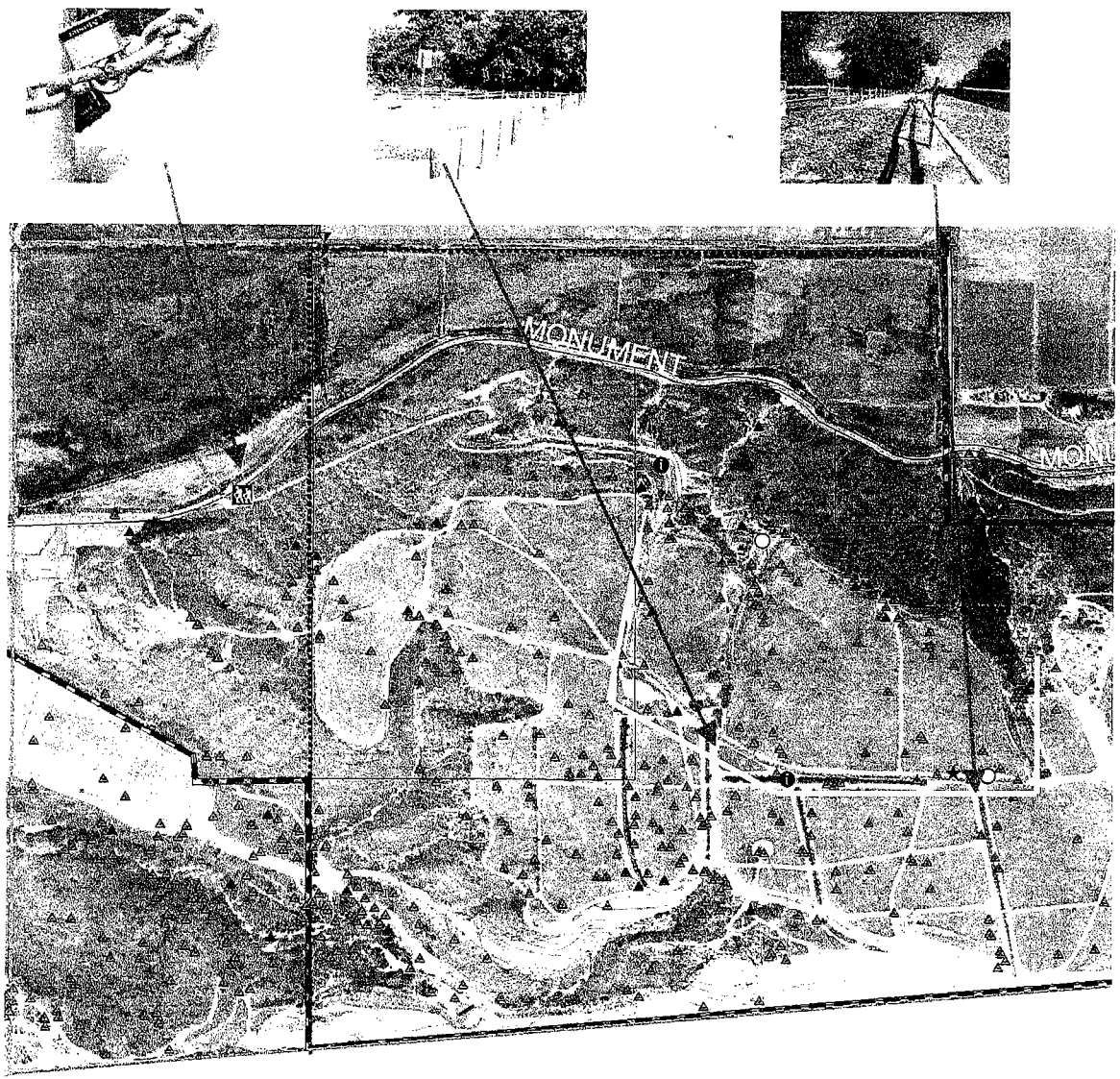


EXHIBIT H

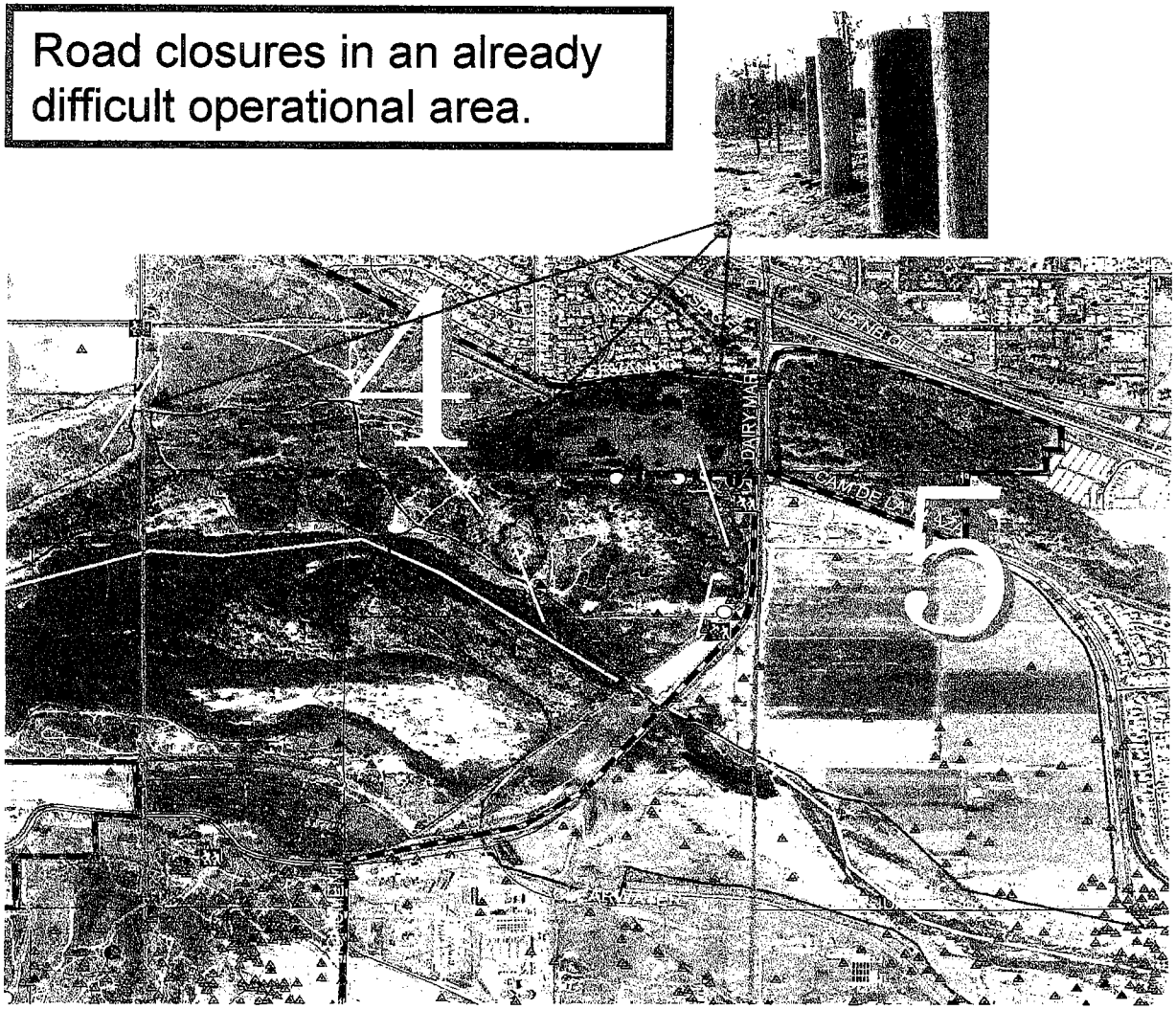
Spooner's Mesa - Remote Steep Hilly Border Incursions



Under the proposed TRVRP Enhancement Project many existing roads would be converted to six foot wide multi-use trails. Fences, gates, poles, and other barriers would be used to restrict vehicular traffic. Border Patrol access and mobility would be considerably limited on Spooner's Mesa and operational effectiveness seriously compromised under this plan.

EXHIBIT I

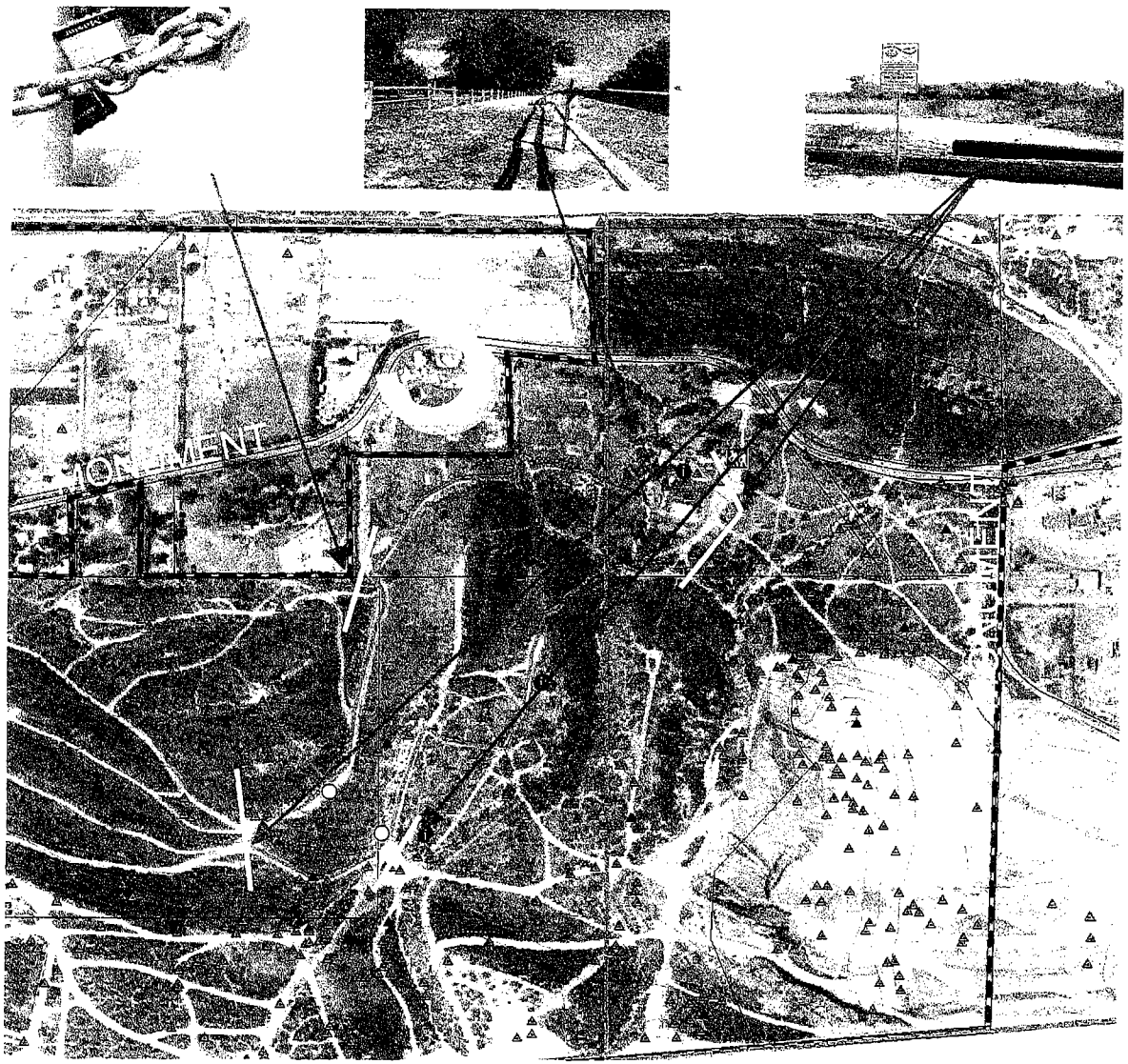
Road closures in an already difficult operational area.



The Dairy Mart Ponds area is a convergence point for many who have eluded apprehension closer to the border. This is the last opportunity for the Border Patrol to make an arrest before suspects enter the neighborhoods to the north.

EXHIBIT J

TRVRP Plan Closes Some of the Border Patrol's Most



The trail loop in this overlay is created in part by closing several existing roads that help the U.S. Border Patrol perform its law enforcement duties. This particular trail would cut off access to the most important observation point for the Border Patrol's infrared scope. This sight alone helps agents control over three miles of international border.

EXHIBIT K

Coronado Shores
CONDOMINIUM ASSOCIATION
1770 Avenida del Mundo « Coronado, California 92118
(619) 437-1267
FAX (619) 437-4507

Good Morning,

In Regards to watching the changes In the Tijuana Valley.

Being a coronado resident for over 45 yrs my family has enjoyed the touch of class from the border to here. Being rough country from the mountains to the sea has been a Great Aspect in watching outcome of our children growing up over this time period.

Please reconsider the changes which seem to be the beg. to the end of our future in the next proposed 50 years to come.

Thank You for your time & Consideration

C. Daley

2004 OCT 27 PM 2 56

SAN DIEGO CA
PM
26 OCT
2004

Parks & Recreation
5201 Ruffin Rd
S.D. CA 92123

ATTN: Maeve Hanley

CONGRESSMAN BOB FILNER

51ST DISTRICT, CALIFORNIA

☐ 2428 Rayburn House Office Building
Washington, DC 20515
(202) 225-8045 Phone
(202) 225-9073 Fax

☑ 333 F Street, Suite A
Chula Vista, CA 91910
(619) 422-5963 Phone
(619) 422-7290 Fax

☐ 1101 Airport Road, Suite D
Imperial, CA 92251
(760) 355-8800 Phone
(760) 355-8802 Fax

http://www.house.gov/filner

Fax Cover Sheet

Date: 11/02/04 Time: 1:30PM

To: MAEVE HANLEY Fax: (858) 495-5841

County of SD Phone:

From: Mario C. Lopez

Number of Pages (including cover sheet): 2

Message:

BOB FILNER
51ST DISTRICT, CALIFORNIA

2428 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
TEL: (202) 225-8045
FAX: (202) 225-9073

333 F STREET, SUITE A
CHULA VISTA, CALIFORNIA 91910
TEL: (619) 422-5963
FAX: (619) 422-7290

1101 AIRPORT ROAD, SUITE D
IMPERIAL, CALIFORNIA 92251
TEL: (760) 355-8800
FAX: (760) 355-8802

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES

TRANSPORTATION AND INFRASTRUCTURE COMMITTEE

SUBCOMMITTEES
COAST GUARD AND MARITIME TRANSPORTATION
RANKING MEMBER

RAILROADS

AVIATION

VETERANS' AFFAIRS COMMITTEE

SUBCOMMITTEE
VETERANS' HEALTH

website: www.house.gov/filner

November 2, 2004

Maeve Hanley
San Diego Department
Of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Maeve:

It has recently come to my attention that there are several concerns regarding the County of San Diego's proposed trails and habitat enhancement project in the Tijuana River Valley Regional Park.

Many of my constituents are concerned that you are proposing to eliminate almost 80 percent of the valley's equestrian trails and have a single 14.7mile multi-use trail.

The Environmental Impact Report (EIR) for this project needs to include the fact that this is one of the last equestrian areas in the County of San Diego and that hikers, cyclists and bird watchers have many other areas to enjoy their activities.

I ask that you keep me updated as this process continues and that you do everything in your power to ensure that the resident's views and opinions are taken into consideration.

Please feel free to contact me or Mario C. López from my staff at (619) 422-5963 if you have any concerns or to keep me updated.

Sincerely,

BOB FILNER
Member of Congress

BF/ml
2175885

November 01, 2004

TO WHOM IT MAY CONCERNS: 2004 NOV 4 PM 3 00

I THINK THE EQUESTRIAN TRAILS SHOULD CONTINUE TO STAY OPEN FOR MANY REASONS. AS AN EQUESTRIAN RIDER WE NEED TO HAVE USE OF THE TRAILS IT IS MUCH SAFER FOR EVERYONE. IT WILL KEEP US OFF THE CITY STREETS PREVENTING ANY ACCIDENTS WITH CARELESS DRIVERS. IT'S A PLACE WHERE WE CAN GO AND ENJOY NATURE AND WILD LIFE AS IT IS. FOR MANY FOLKS WHO ARE LOW INCOME AND ENJOY THE PRESCENSE OF HORSES COME HERE TO THE TRV, BECAUSE RATES ARE LOW AND IT MAKES IT MORE AFFORDABLE TO OWN HORSES. IT GIVES PEOPLE AN INCINTIVE TO COME TO THE TRV. A LOT OF FOLKS REALLY LIKE HORSES, FOR MOST IT'S THEIR DREAM. WHY TAKE AWAY FROM THAT? HERE WE ARE TALKING ABOUT HAVING A GOOD HABITAT. WELL HORSES ARE A PART OF THAT, THEY WERE AROUND FOR A VERY LONG TIME. ALSO IN KEEPING THE RENTAL STABLES OPEN AND ACTIVE PROVIDES A PLACE FOR PEOPLE/VISITORS TO COME AND ENJOY A MORE PEACEFUL AND SERENE ENVIROMENT WITH THEIR FAMILIES AND FRIENDS. IT IS LIKE A SANCTUARY FOR PEOPLE SO THEY CAN GET AWAY FROM THEIR STRESSFUL AND BUSY LIVES, EVEN IF IT IS FOR A COUPLE OF HOURS OUT OF THE DAY. IT GIVES OPPOURTUNITY TO THOSE WHO ARE LESS FORTUNATE. LETTING THEM BE ABLE TO SEE NATURE AND WILDLIFE IN THEIR NATURAL SETTING. GIVES THEM THE CHANCE TO EXPERIENCE NEW THINGS AND TO BE AROUND SOMETHING THEY LOVE DOING. IT LETS VISITORS SEE THE OTHER SIDE OF SAN DIEGO, CALIFORNIA THAN JUST BIG BUILDINGS AND HIGH TRAFFIC. THESE RENTAL STABLES ARE USED FOR MUCH MORE THAN BOARDING HORSES AS WELL. IT LETS FOLKS HAVE GET TOGETHERS, HAVE A WEDDING OR TWO, GIVES YOUNG MEN AND WOMEN A PLACE TO WORK AND USE THEIR TIME WISELY. KEEPS THEM BUSY AS TO NOT CAUSE TROUBLE TO SOCIETY. A LOT OF PEOPLE RELY ON HORSES TO KEEP THEM EMPLOYED SO THEY CAN PROVIDE FOR THEIR FAMILIES. IT'S A PLACE WHERE DISABLED PEOPLE CAN GO TO USE THE HORSES AND TRAILS FOR THERAPY. HOWEVER THERE ARE A FEW THINGS THAT CAN CEASE. THE LITTERING OF BEER CANS, ILLEGAL DUMPING OF TRASH, PAINT BALLERS, NON-AUTHORITY TYPE USING OFF ROAD VEHICLES AND ATV'S. AND ALL THIS IS NOT JUST FROM THE FOLKS WHO RIDE HORSES. IT IS FROM EVERYONE IN THE SURROUNDING AREAS. SO ALL THE BLAME SHOULDN'T BE ON THE EQUESTRIAN ALONE. THIS IS A PLACE WHERE WE BRING OUR CHILDREN AND GRANDCHILDREN. I BELIEVE IF WE COULD ALL JUST WORK TOGETHER THEN NOTHING HAS TO BE ELIMINATED. SOMEHOW MAYBE THE RENTAL STABLES AND ALL OTHER RANCHS IN THE SURROUNDING AREAS COULD GET TOGEHTER AND START DESIGNATING A CLEAN-UP PARTY ONCE A MONTH. SO THAT WAY THE TRAILS WILL BE SAFER, CLEANER, AND MORE NATURAL.

SINCERELY,
A CONCERNED RIDER

THE CITY OF SAN DIEGO

October 21, 2004

Maeve Hanley
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, California 92123

Reference: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project Draft Environmental Impact Report (EIR)

2004 OCT 26 PM 5:35

Dear Ms. Hanley:

This letter is in response to the announcement of the Notice of Preparation of the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project Draft Environmental Impact Report (EIR). As you may know, there are a number of Metropolitan Wastewater Department (MWWD) facilities (sewer lines, ocean outfall, pump stations and the South Bay Water Reclamation Plant) within or bordering the study area. Protection of and access to these facilities should be considered in development of the Project and EIR. Additionally, MWWD has several past mitigation projects in the study area. These sites must be maintained for the protection of the resources they are compensatory mitigation for.

Please include MWWD on the list of interested parties and on the list to receive copies of future notices and the environmental document.

Thank you for your consideration. Please let me know if you have any questions regarding these comments or MWWD's facilities.

Sincerely,

Laura Ball

Laura Ball
Senior Planner

LB/lb

DIVERSITY BRINGS US ALL TOGETHER

Metropolitan Wastewater • Public Works
600 B Street, Suite 500 • San Diego, CA 92101-4587
Tel (619) 533-4200 Fax (619) 533-4267

THE CITY OF SAN DIEGO

Metropolitan Operations Center • Metropolitan Wastewater
9192 Topaz Way • San Diego, California 92123

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Maeve Hanley
San Diego County Dept. of Parks & Rec.
5201 Ruffin Rd., Ste P
San Diego CA 92123

92123+1653

Ms. Maeve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

October 30, 2004

RE: Notice of Preparation of a Draft Environmental Impact Report for 'Tijuana River Valley Regional Park, Trails and Habitat Enhancement Project' (Project)

Dear Ms. Hanley,

Thank you for the opportunity to comment on the subject project.

The Tijuana River Valley Regional Park is important for maintaining the natural functions of the Tijuana River watershed including: water quality restoration; hydrologic connectivity, erosion control and flood damage reduction; habitat connectivity; fish and wildlife habitat; wetland habitat, maintenance of biodiversity; and natural ecological processes. To protect the natural functions of the Tijuana River Valley Regional Park, the Project should address the management practices and measures that will be taken to maintain these natural functions.

The Project as described at the October 25, 2004 public scoping meeting envisions a network of trails within the Park for equestrians, bicyclists, hikers and so on. What management practices and measures will be taken by the Project to ensure that the water quality of the Tijuana River and the Tijuana River Estuary are restored and protected?

Both the Tijuana River and the Tijuana River Estuary are currently on the federal Clean Water Act, Section 303(d) list of impaired waters <http://www.swrcb.ca.gov/tmdl/303d_lists.html>. The waters on the Section 303(d) list do not meet water quality standards (e.g., the beneficial uses of water, water quality objectives and criteria, and the non-degradation policy as listed in the Water Quality Control Plan for the San Diego Basin (9) (Basin Plan). <http://www.swrcb.ca.gov/rwqcb9/programs/basinplan.html>

Pollutants and stressors for the Tijuana River and the Tijuana River Estuary include the following:

Clean Water Act, Section 303(d) pollutants and stressors	
Tijuana River	**Tijuana River Estuary**
Bacteria Indicators	Bacteria Indicators
Eutrophic	Eutrophic
Low Dissolved Oxygen	Low Dissolved Oxygen
Pesticides	Pesticides
Solids	Thallium
Synthetic Organics	Nickel
Trace Elements	Lead
Trash	Trash

The Environmental Impact Report (EIR) should describe the management practices and measures that will be put in place to protect the beneficial uses of the Tijuana River and Tijuana River Estuary. How will water quality stressors (e.g., horse manure) be controlled in the future to ensure that the water quality objectives (e.g., biostimulatory substances, bacteria, dissolved oxygen, and so on) for the Tijuana River and Tijuana River Estuary are met?

Sincerely,

Cheryl Seaco

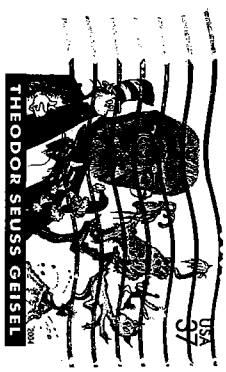
2444 69th Street
Lemon Grove, CA 91945-3417

Cheryl Siscon
2444 69th St.
Lemon Grove, CA 91945-3417

2004 NOV 2 PM 1 50

October 30, 2004

Ms. Maeve Hanley
San Diego Dept. of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123



:al Impact Report for 'Tijuana River Valley Regional
roject)

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ry are currently on the federal Clean Water Act,
.swrcb.ca.gov/tmdl/303d_lists.html>. The waters on the
dards (e.g., the beneficial uses of water, water
ation policy as listed in the Water Quality Control
tp://www.swrcb.ca.gov/rwqcb9/programs/basinplan.html>

the Tijuana River Estuary include the following:

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e) be controlled in the future to ensure that the
inces, bacteria, dissolved oxygen, and so on) for
?

Cheryl Siscon
2444 69th Street
Lemon Grove, CA 91945-3417

92123+4310

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

Thank you for your interest in this Project. Please provide any comments or questions you would like addressed in the scope and content of the Environmental Impact Report (EIR) that the County of San Diego is intending to prepare. By November 4, 2004, you may submit your comments on this form and submit them either at the public meeting, by fax at the number below or by mail to the address on the reverse of this form. You may call Maeve Hanley, San Diego County Department of Parks & Recreation at (858) 694-2968 for more information on this project.

PLEASE PRINT

e-mail address (optional)

Charles Schechter
Name

Organization

684 Seacoast Dr
Street Address

Daytime Phone No. (optional)

Imperial Beach
City

CA
State

91932
Zip Code

2004 NOV 4 AM 10 06

Please provide us with your comments that will help us to refine the scope and content of the Draft EIR. Please provide your comments in the section below (use additional pages if necessary).

It is a sad day when the Recreation Department wants to take away recreational use areas. Most of the existing narrow, environment-friendly equestrian trails and walking paths do not bisect the Least Bell's Vireo habitat. Also, asking horses to share the road with bicyclists is asking for a disaster. But, if this is a losing battle, please be aware that many horses do not have horseshoes when you choose how the trail will be "paved".

Thank you for your time and interest in the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – State Clearinghouse #2004091159

Comments must be received by November 4, 2004.
Fax 858-495-5138 (or mail, see over)

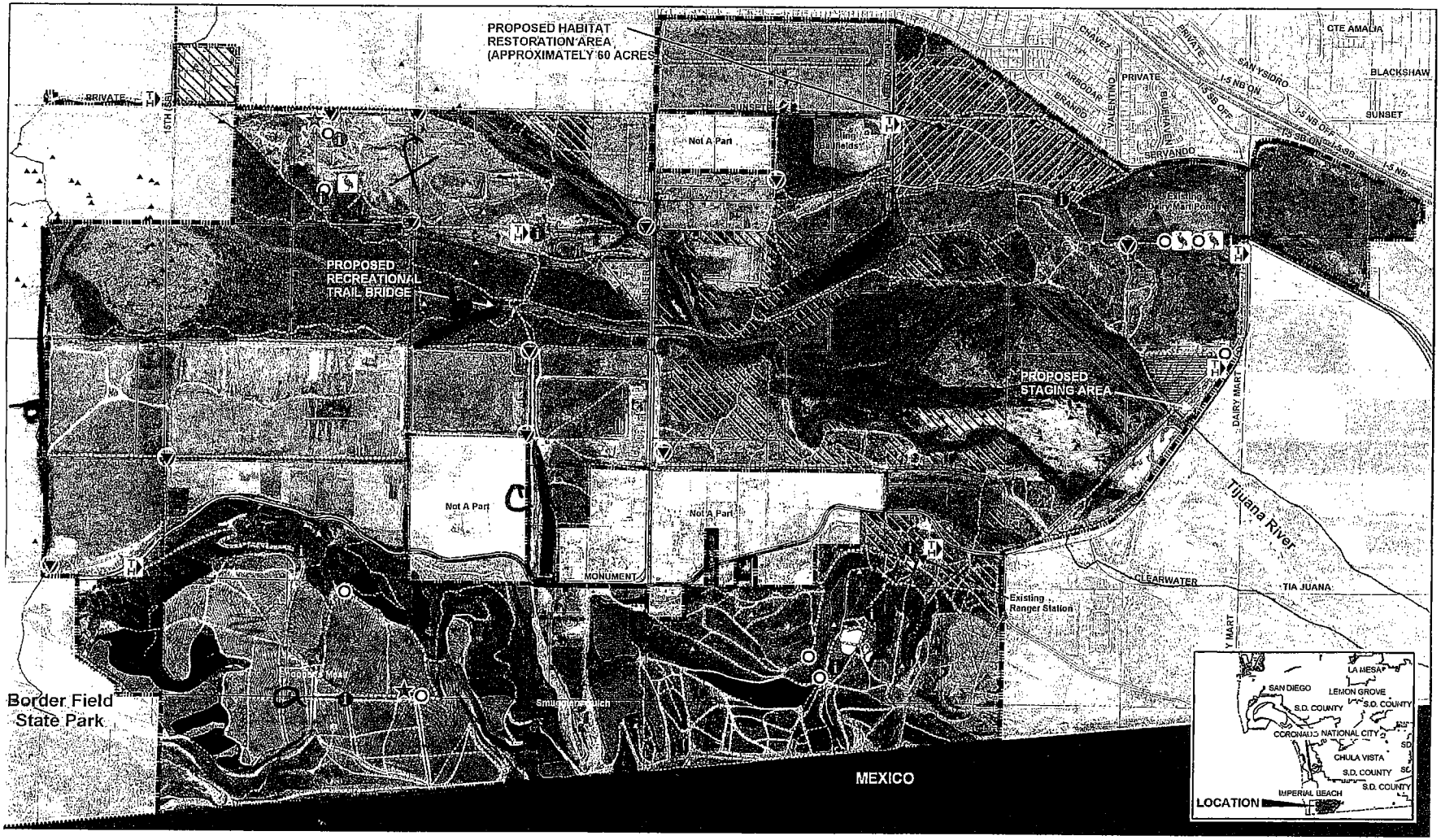
In the SW corner, east of Border Field, labeled "a", Spooner's Mesa, there are many paths none of which bisect the Least Bell's Vireo habitat. The same is true for the many existing paths in the north labeled "f," no sensitive bird species. Therefore, there is no reason to close these paths. Also, there is no trail from Spooner's Mesa to Border Field on the west, or to the mesa on the east, through Smuggler's Gulch.

The MOU trail, cathedral, from the proposed bridge, labeled "b" should be kept open to take advantage of the bridge.

The MOU trail on the west side labeled "d", Perl Road, connects to state and other property and does not bisect the Least Bell's habitat.

The area labeled "e," Sherwood Forest, is an area used by many older horseback riders. These riders and their horses do not destroy the serenity of the natural habitat. In fact, the birds may be there due to the trails.

The Least Bell's do not look like they are on the trail "c," Smuggler's Gulch, which would mean there is no need to close it.



Proposed Project to Permit

- 6' Wide Multi-Use Trail (14.7 Miles)
- Memo of Understanding (MOU) Trail 1997 (To be superseded by the Proposed Project) - (10.3 Miles)
- Proposed Habitat Restoration (60 acres)
- Future Habitat Restoration areas, (Approximately 89 acres)
- Trail Head (Sign with park map, hitching pos bike rack and bench)
- Interpretive Signage
- Hitching post and bike rack
- Bench
- Bird Observation Blind
- Directional Signage

NOTES:
Trail Marker Locations to be determined
See plan for Proposed Recreational Bridge
See plan for Proposed Staging Area

Existing Conditions

- Tijuana River Valley Regional Park
- Existing Dirt Roads and Pathways (71.0 Miles)*
- Tijuana River National Estuarine Research Reserve (TRNERR)

Riparian Plant Communities**

- Southern Willow Scrub
- Restored Southern Willow Scrub
- Southern Cottonwood-Willow Riparian
- Mule Fat Scrub
- Fresh Water Marsh
- Open Water

Rare Plant Locations**

- Chaenactis glabriuscula var. orcuttiana
- Coreopsis maritima
- Euphorbia misera
- Ferocactus viridescens
- Ornithostaphylos oppositifolia
- Quercus dumosa
- Selaginella cinerascens
- Viguiera laciniata

Spring Survey**

- Least Bell's Vireo
- Other Sensitive Bird Species

* Data Source: Don Hays Trails, Inc., 2004
** Data Source: EcoSystems Restoration Associates, 2004

County of San Diego

NORTH

0 600 1,200 2,400 3,600 Feet

Tijuana River Valley Regional Park

Trails and Habitat Enhancement Project

PARKS AND RECREATION
COUNTY OF SAN DIEGO

VAN DYKE LLP

Greystone Environmental Consultants, Inc.
SWCA Environmental Consultants
WRC Consulting Services
G-Force

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Proposed Project (Sheet A)
Exhibit 3
Draft 9-23-04

TIJUANA RIVER VALLEY REGIONAL PARK
TRAILS AND HABITAT ENHANCEMENT PROJECT
Comment Form

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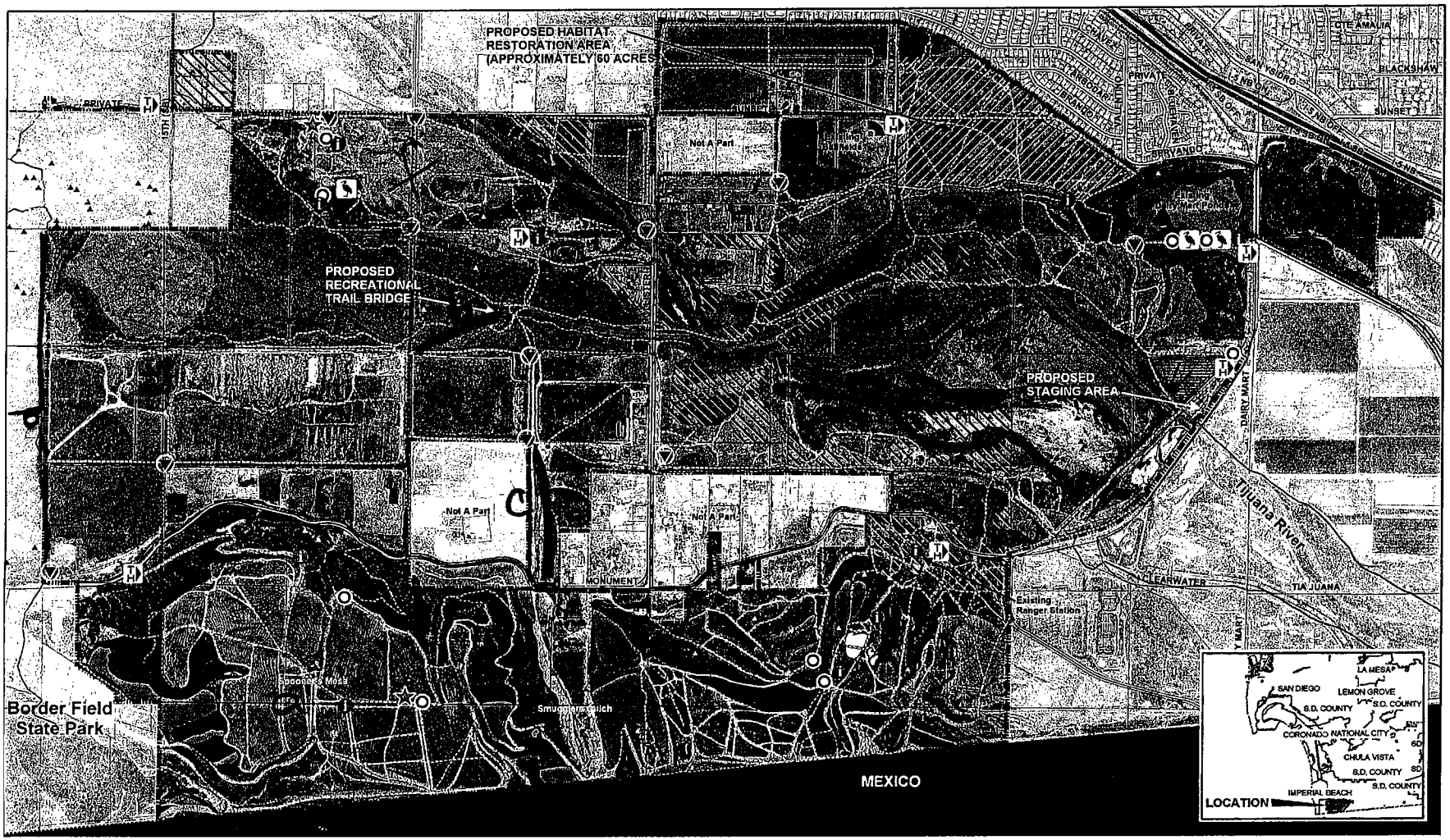

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County of San Diego

Tijuana River Valley Regional Park

Trails and Habitat Enhancement Project

PARKS AND RECREATION
COUNTY OF SAN DIEGO

VAN DYKE LLP

Greystone Environmental Consultants, Inc.
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WRC Consulting Services
G-Force

SanGIS

Proposed Project (Sheet A)
Exhibit 3
Draft 9-23-04

Carolyn Powers
Chair
Citizens Against Recreational Eviction
CARE
1460 Seacoast Drive, C-3
Imperial Beach, CA 91932
619.871.9963
care4trv@aol.com

2004 NOV 4 PM 2 54

November 1, 2004

Ms. Maeve Hanley
San Diego Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, Ca 92123

Tijuana River Valley Regional Park
Trails and Habitat Enhancement Projects
Draft Environmental Impact Report (DEIR)

COMMENTS

Thank you for considering the enclosed comments to the DEIR.

The proposed Trails and Habitat Enhancement Project does not represent the culmination of efforts and input provided by the Community over the last many years. In reviewing materials in preparation for writing the enclosed comments, we came across a summery from a County-sponsored Community workshop for the **Framework Management Plan** dated May 12,1999. County Project Manager Ric Repasy reportedt he comments from breakout community groups attending the meeting. More trails, camping grounds, a community arena, a museum and hosting youth groups were among the items requested by park users. The current proposal indicates that the interests of the community don't seem to count for much to influence long term county planning efforts.

I. HABITAT - The habitat supporting both the trails and the endangered species in the Tijuana River Valley have grown up around a trail system that has existed and been in common use for over 75 years. Equestrian trails have actually been utilized continuously for transportation and recreation in the Tijuana River Valley since 1769.

Riparian habitat has grown, even flourished along this ephemeral stream, despite a 7-year drought that ended in "Miracle March" in 1992 and the floods of 1993 due to the 24-hour a day, 365-days a year, renegade sewage flows from Tijuana, providing a sewage-based ecosystem. This raised the water table and provided more than adequate nutrients to the growth of willows, mulefat and other wetland flora. The current status quo of horse use in the valley has not been shown to have a negative impact on either the habitat or the primary endangered species in the Valley, the least Bells vireo. The cowbird trapping program these last few years have been relatively fruitless, indicating that the cowbird population is well under control. Least Bells vireo likes to nest and forage by clearings or trails. The vireo surveys indicate the

prevalence of this pattern year after year. Our vireo population has grown exponentially second to none along the California and Mexican Pacific Coast. In 1991, Tom Alexander of US Fish and Wildlife, said that he had read a study indicating that the vireos liked to nest near or adjacent to clearings or trails because they could better forage for insects and sight predators in the open space.

"Floristic Effects

"...It is unknown to what extent high quality livestock forage available contains weed seeds. However, most horse owners would not buy junk hay for their horses. Garbage in, poor performance out! The days of large populations of lower-grade, inexpensive stock horses are long gone. Horses cost money, and the purchase price is only the down payment for ownership. Horsemen cannot afford to compromise their investments by feeding weedy hay. Responsible horse owners are concerned about getting quality feed that has been properly planted, harvested, and cured for their horse food dollar. Many horses are fed processed feedstocks. This is forage that is heated. The heat destroys weed seeds.

"...The bulk of unprocessed forage consumed by California horses is alfalfa (Medicago sativa), rye grass (Lolium multiflorum or perenne), Timothy hay(Phleum pratense) and oat hay (Avema satova. white cultivated oats). If horses were a vector of seed spread, these grasses could be prevalent in our open spaces and parks, but they are not. Nor are these forage feeds listed on the California Exotic Pest Plant Council web site at this time. Tamarisk, knapweed, thistles, etc., are the big culprits. Horses do not eat these species, many of which are actually toxic to the equine."

NOTE: In the State of California, only certified seedless alfalfa is allowed to be sold. We pay $10 to $14 per bale compared to Utah, where additional processes to remove viable seeding possibilities are not required and the cost is around $4 per bale.

"...Bennett and Zuelke (1999) undertook an extensive review of recreation effects on birds and concluded that disturbance from recreation has temporary effects on behavior and movement of birds. Direct approaches caused greater disturbance than tangential approaches, rapid movement by joggers was more disturbing than slower hikers; children and photographers were especially disturbing, and passing or stopping vehicles were less disturbing than human foot traffic. Horses and riders did not disturb birds.

NOTE: There are many vireo nesting sites within a few feet of the freeway close to Dairy Mart Ponds.

"...The bottom line is that horse trails can be maintained on most natural preserves without unacceptably impacting ecological values.

"...As we have shown, the presence of the horse as a lightweight, low impact user on single-track trails does not pose a significant risk to fauna, flora or the trails themselves."

Please see "*Exhibit B THE HORSE: HIGH VS. LOW IMPACT USER*" by Adda Quinn, Envirohorse, May 2, 2001.

II. MOU TRAILS - Equestrians have long used a trail system that was first "authorized" in the early 1980s. These trails have been used by early mission-era travelers since 1769 and the local Indian tribes in the years before farming and urban planning interests have converted those early trails into farm maintenance roads and city streets. The trail system became more formalized due to the efforts of the State Park system and local equestrians and resulted in handout maps distributed by State Parks.

The status of the trail system formalized in the 1980s was threatened by the plans for the Model Marsh contemplated in a Draft Environmental Impact Report published in 1991 with funding from the California State Coastal Conservancy. The project

included an element that would permanently close the long used beach access trail through Border Field State Park. The resulting backlash lead to a series of "Round Table Trails Committee" meetings sponsored by the County and eventually to what is known as the "approved MOU trail system," signed and agreed upon after 7 years of meetings, hikes and rather heated discussions by the County and Cities of San Diego, Coastal Conservancy, Coastal Commission, Fish and Wildlife, US Border Patrol, CARE and TRVEA. The committee is still in existence and currently known as the "Trails Committee" for the Tijuana River National Estuarine Research Reserve Management Authority (TRNERRMA) and continues to meet quarterly or more recently, almost monthly.

The $1,000,000 Trails and Habitat Enhancement Project was introduced to equestrians by Conservancy representative Jim King as a tool for bettering our trail connectivity and recreational access to the California Coastal Trail and the neighboring (and growing) lands to the east. Instead, we find that our trails have been drastically reduced in both quality and quantity. We find this outrageous and unacceptable.

Over half of our Memo Of Understanding (MOU) trails have been relocated to open farm roads or berms without regard to aesthetic or natural appeal and away from the intimate, riparian traditional trails that we value. **We ARE the Taxpayers** that purchased the lands making up the Tijuana River Valley County Regional Park. We pay the salaries of the governmental agency staff and the environmental consultants that make up the panel that will make the final determination on this trails and habitat project. Our children and our grandchildren will live with the decisions to be made by a panel that excludes actual Public participation. To our knowledge, none of the panelists have experienced our trails or have visited them from an equestrian viewpoint. We ask to be more intimately involved with the decisions made by this panel, indeed, that a member of the public, representing valley property owners and recreationalists be appointed to this panel.

Starting on the upper (northern) left (western) corner of the map and moving east, we offer comments on the various trail linkages being offered under ***"EXHIBIT A, Sheet A, Exhibit 3"*** of the 9/23/04 Draft "Trails and Habitat Enhancement Project". **NOTE: The "71 miles of existing trails" (equestrian?) reported in the scoping document is very misleading.**

Both the trails currently in use by or constructed by equestrians, including the MOU trails, are much shorter in length and occupy far less land. Most of our trails are also much narrower and cumulatively occupy much less square footage than the proposed 6-foot wide multipurpose trail system being proposed. Illegal immigrants and the resultant Border Patrol activities are responsible for at least 2/3rds of these "71 miles". There are several hundred horses used for recreation residing in the Tijuana River Valley and many more visiting from out of area that would be denied the unique, existing trail system and be forced to battle bicycles and other horsefrights on the "Yellow Brick Road" being proposed. This is a very poor trade-off. Bicycle groups have made it abundantly clear that they have no interest in using our trails due to the deep sandy nature of the trails themselves.

NOTE: Mulching native habitat from trail clearance activities to provide trail cover and a demarcation of trail from habitat would provide a sustainable ground cover.

A. Although the MOU trail west of the former Skibbe property seems to lead to the federal trails to the west and appears to be overlaid by the new, proposed 6-foot wide trail, the trail that crosses the Northern Channel and proceeds (across more federal lands) to the Opel and Egger boarding ranches is not marked on the proposed map. This is an important linkage trail and needs to be kept on the map.

B. The trail route between the Skibbe property east to Saturn Blvd. has utilized

Sunset Avenue as a trail, totally ignoring our long used southern trail paralleling the main river channel, skirting the south side of the IBWC mitigation site 3. The entire trail (Wycliff Trail) and its linkage function is gone leaving riders Sunset Avenue as a replacement and in competition with automobiles as a replacement.

C. From the junction of Sunset and Saturn south all the way to Monument Road, most of our MOU trail is missing. This (Saturn Blvd.) was long a city street and a transportation link with a vehicular river crossing. It begins north of Palm and continues south to Monument Road. Since the crossing washed out in the 1970's flood, the route has continued to be used by equestrians, providing access from mid-valley to Monument Road, and then continuing up Smugglers Gulch to Spooner Mesa and the Mexican Border. Horses cross the river channel during the dry season.

D. From Hollister Street progressing easterly along Sunset to the ballfields, it also appears that our request for a safe trail (alongside Sunset Ave.) on the old Norm Robert's Property has been denied without further dialogue. This "off Sunset" trail would provide a good measure of safety in defense of the fast vehicular traffic supplied by fast paced older siblings and parents traveling to and from Little League games as well as future football and soccer games for both equestrians and cyclists. We had requested this trail to be a joint project, including the placement of streetlights, by the City and County of San Diego. The traffic on this stretch, especially at night, gets pretty hairy and a safety trail is needed especially to avoid drivers playing "chicken" with equestrians and bicyclists.

E. "Proposed Habitat Restoration Trails" - Once again, the equestrians would be forced out of our favored inner trails and pushed outwards (North and South) to broad dusty open trail routes (the infamous "Yellow Brick Road" that is little more than roads shared continuously with bicyclists and pedestrians. Many horses do NOT like bikes, and in their fear at the sudden appearance of a bike on the trail in front or behind them, will buck, rear or kick out at the offender injuring either rider. Multiple use trails in many areas of California, such as, the Santa Monica Mountains and the Tahoe Rim have been safety hazards since their development. Many equestrians no longer use these trails due to safety issues regarding line of sight and speed.

F. Eastern Dairy Mart Pond Trails - Again, we would be losing valuable, beautiful trails along the northern bank of the Tijuana River. For years we have utilized a simple 45-minute loop trail with the proposed trail route plus the southerly trail as a return. This loop would be eliminated.

G. The riparian trails from Dairy Mart Road west to Hollister Street Trails would be eliminated under this proposal.

H. Hollister Street is currently used as a trail throughout its north to south length, including the equestrian lane on the northern Hollister Street Bridge. There are existing trails used by many running under the Hollister Street Bridge both north and south of the river. The northern link runs from the old Gotleib Property to the Effie May crossing. The southern link to Smugglers Gulch. Please allow us to show you this linkage in person.

I. "Other Mesa" Trail- This trail goes from the east in the gravel pit, along the mesa to Smuggler Gulch connecting to Spooners Mesa Trail.

J. "Other Mesa" Trail - North to the 25-year flood berm. This trail is not on the proposal, but is an extremely important linkage trail that connects the Mesa Trails to the 25-year berm trail, traveling north, via skirting the eastern edge of the Southwest Feed property, crossing Monument Road to skirt the eastern side of the eastern portion of the Spurling property along the north west berm.

K. These eastern mesa trails are a valuable part of our trail system with fantastic views of downtown Tijuana, the Tijuana River Valley and the Pacific Ocean. We

would be ill thought to allow their removal. They are also of extreme value to the Border Patrol and well utilized by illegal immigrants. For the equestrians to be denied equal rights to use these trails doesn't make sense. Does one need to break the laws in order to enjoy these long used routes?

L. Smugglers Gulch to Goat Canyon via Spooners Mesa. The proposed project removes us from this incredible, long used trail. The switchback trail from Smugglers Gulch has been entirely cut out.

M. Smugglers Gulch north from the border to the Tijuana River. This trail crosses Monument Road, follows the Jim Martin Property to the City owned 7 acre parcel to the Smugglers bridge crossing to the west side (**See *"EXHIBIT F"***) and proceeding to the Effie May river crossing. This has long been a very popular trail and important trail linkage.

N. The "Yellow Brick Road" makes a lot of sense as a freeway connecting Dairy Mart Road to the east, and traversing westerly along the 25-year flood berm, crossing Hollister Street, the Smugglers Bridge and tying into the Pacific Estuarine Research La b (PERL) Road on the west. It is, however, a long straight wide raised road, inviting our youth to engage in dangerous horse racing that could cost the County plenty in the way of lawsuits. We have long advocated a much more environmentally sensitive narrow meandering trail system that by its very design includes trail calming devices that improve the safety of multiple use trails by controlling speed.

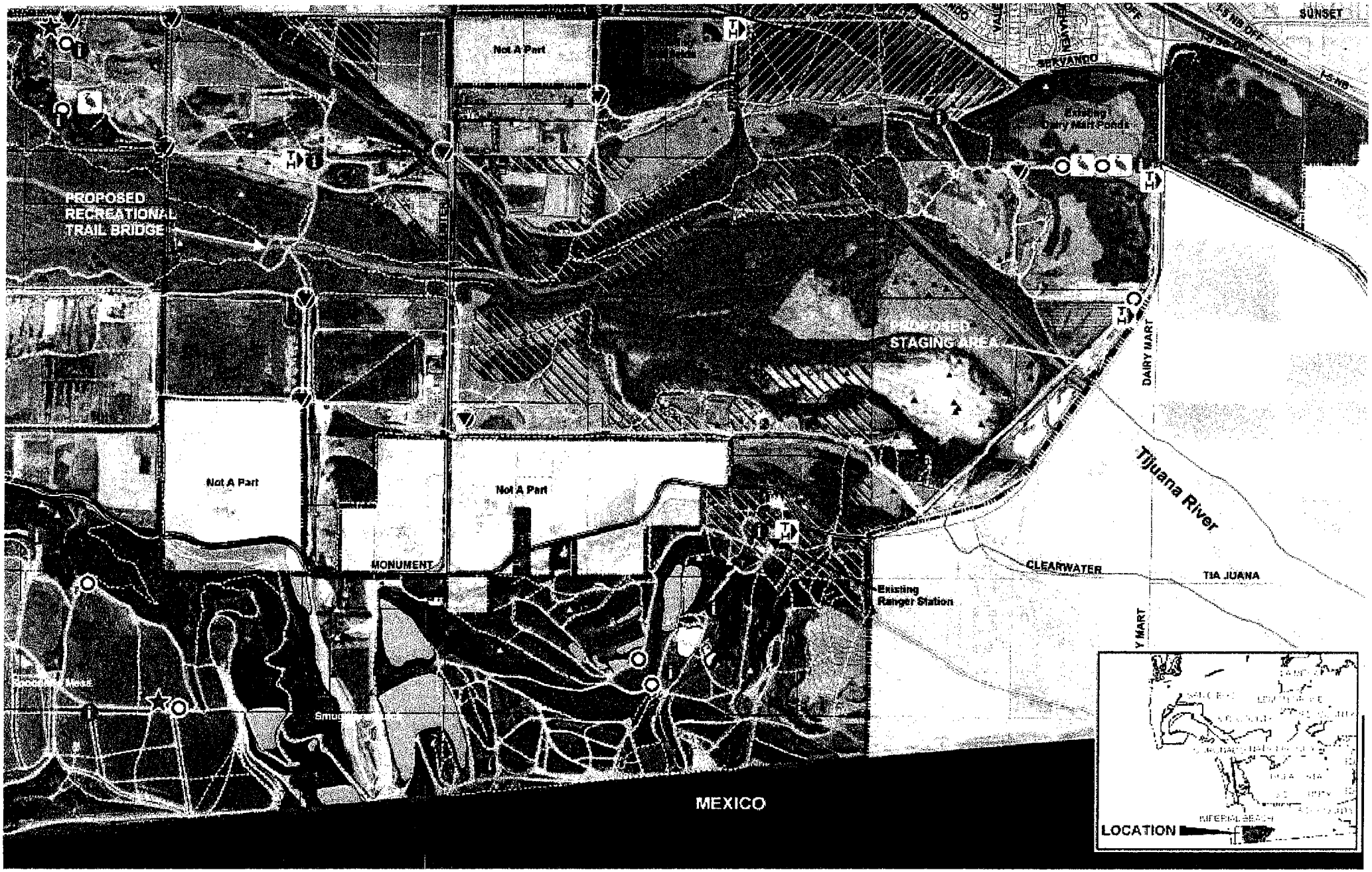
O. The Riparian Inner River Trails being exterminated by the planned trail system as currently presented in this DEIR. The loss of these trails really cripples the richness of the aesthetic experience of riding trails in the Tijuana River Valley. Please see ***"EXHIBITC"***, the trailhead to Brian's Bridle Path (or "Bridal Path" as the County initially inaugurated it and misspelled Brian Bilbray's trail.)

1. North of the River (West->East)
   a. The Wycliff Trail, from the western end of Sunset, basically paralleling the river and traveling to the Effie May crossing.
   b. From the Effie May crossing to under the Hollister Bridge
   c. From under the Bridge, up the Erodible Berm to Sherwood Forest.
   d. Sherwood Forest travels from east of Hollister Street following the river. The willows are old growth and have a very unique feel as you ride through them. It is aptly named.
2. South of the River (West->East)
   a. Brian's Bridle Path, from the Effie May crossing to the "Mitigation Trail" (the City's 7 acre mitigation site for constructing the pilot channel). This is one of the very most beautiful trails one has ever experienced, especially in the winter, when your environment feels like an emerald green rain forest, with canopied trees arching overhead. It takes your breath away.
   b. From Brian's Bridle Path to Hollister Street along the AmSod Berm.
   c. The old south of the river trail paralleling the river as it provides linkage between Hollister Street to a tie in at the 25-year berm.

III. **CAMPING FACILITIES** - Public and Equestrian facilities for day and overnight camping at either/or both at Spooner's Mesa or on the western side of the old AmSod property across from Goat Canyon have long been contemplated by the County and the Community. They have evidently been summarily dismissed with out further discussion with the Public. The facilities were on an earlier Draft Framework Plan written by the County from 1999 or 2000.

IV. **BICYCLE TRAIL USAGE** - As mentioned before, cyclists have made it clear that they have no interest in trails in the Tijuana River Valley.

V. **COMMUNITY EQUESTRIAN FACILITIES** - Although the arena on the Skibbe



County of San Diego EXHIBIT A"

NORTH

0 600 1,200 2,400 3,600 Fe

uana River Valley Regional Park

PARKS AND RECREATION
COUNTY OF SAN DIEGO

"EXHIBIT B"

dskackert

From: Robert & Kathleen Hayden <prknride@znet.com>
To: <Caballeros_del_Sol@egroups.com>
Cc: Keith and Rheba Pullman <yotally@pacbell.net>; bill browning <BillBrowning@juno.com>; <Bjenks7@aol.com>; Bonnie Salbach <bsalbach@mindportusa.com>; Candace Ricks <c.ricks@prodigy.net>; Carolyn Pwers <care4trv@aol.com>; Cheryl Wegner <ChrylWgnr@aol.com>; Clark and Joselyn Wilson <bluemoonranchaz@hotmail.com>; Daniel Greenstadt <daniel@tassociates.com>; Dominic Gotelli <dowago@access1.net>; don and carol McNeil <cmac2horse@aol.com>; Dorothy smith <hooves-n-wheels@juno.com>; dskackert <dskackert@email.msn.com>; James K. Sterrett <sterrett@san.rr.com>; John and Arvie deganfelder <arvied@aol.com>; Judy Taylor <starboundjudy@znet.com>; Les & kay Levie <Doublelfarms@znet.com>; Liz Wilson <LIZART1@WORLDNET.ATT.NET>; Melody O'driscoll <melodyo@abac.com>; Monique Morton <sisbuck@hotmail.com>; Pat Riggs
Sent: Saturday, May 05, 2001 4:08 PM
Attach: header.htm
Subject: Fw: Facts on how the horse is a "low inpact user"

----- Original Message -----
From: Robert & Kathleen Hayden
To: bruce.lieberman@uniontrib.com
Cc: Les & kay Levie ; Borrego Sun
Sent: Friday, May 04, 2001 9:07 AM
Subject: Facts on how the horse is a "low inpact user"

EXHIBIT "B"

EnviroHorse

3027 St. James Rd. Belmont CA 94002-2955 650-592-0722
envirohorse@yahoo.com www.californiastatehorsemen.com/envirohorse.htm

May 2, 2001

THE HORSE: HIGH VS. LOW IMPACT USER

In virtually every mixed use trail reference within the State of California and nationally, the horse has been defined as a low, or lightweight impact user, even in the most sensitive environments: the Natural Preserves!

Edgewood Park and Natural Preserve Master Plan Adopted May 1997 (Parks and Recreation Division San Mateo County) Pg. 11 B. Definitions 6. Definition of Low-Intensity Recreation Uses: "Define low-intensity recreation uses as passive recreation uses that will not create a direct or cumulative adverse environmental impact. Such uses include, but are not limited to, on-trail hiking, walking, jogging, horseback riding, nature observation, education, docent-led group tours, and picnicking and camping..." this is a natural preserve of rare serpentine grassland that supports numerous threatened and endangered species. Horses share the same trails as equestrians. Bikes are not permitted.

The Mid-Peninsula Open Space District (MROSD) defines Trail Use Suitability to include:

Hiking, Running, Equestrian, and Bicycling throughout most of their 43,000 acres of Natural Preserves.

Santa Clara County Countywide Trails Master Plan, 1995,"identifies hiking, horseback riding, and bicycling trails" as lightweight use.

The USDA Region Five Shasta-Trinity Nation Forest Trail Procedure Guide builds trails to include the horse as a lightweight user.

The US Forest Service/USDA Rocky Mountain Region Guide for Mountain Trail Development builds trails for hikers, joggers, and equestrians, all considered lightweight, low-impact users.

The California Trails Foundation uses the California Department of Parks and Recreation Klamath District/North Coast Redwoods District Trail Manual. Section 1.4 Trail Standards for Class I Trails that states, " These trails include ***handicapped accessible***, equestrian, interpretive and hiking trails assigned a Class I point criteria value. "

The State of Washington Department of Natural Resources' Recreation Trail Maintenance produced in cooperation with the USDA and NPS designs trails for low-impact users, including equestrians.

The Bay Area Ridge Trail creates a multi-use trail system around the San Francisco Bay for hikers, bikers, joggers, and equestrians that are all considered lightweight users.

Since 1915, the Rocky Mountain National Park has included equestrians as low-impact users.

EQUINE TRAIL INTERACTIONS

Every trail user group causes some impact to the environment by their use. For lightweight low impact users, the effects are usually minimal. The attempt to describe the horse as "consumptive" use is really a stretch. On what basis is any lightweight trail user "consumptive"? There are scientific studies which clearly indicate that the horse is much more benign to wildlife than hikers, nature studiers and photographers. There are no studies that implicate the horse with spreading weeds. And, natural erosive forces are by far the major alteration factors in trail erosion.

Wildlife Effects

Horses are prey animals. They have eyes on the side of their head. They are herbivores and leave the trace scent of an herbivore on the trail. Humans and dogs are predators. Their eyes are on the front of their face. As they walk, they leave the trace scent of omnivore on the trail that can impact wildlife.

Horses are recognized by wildlife as prey animals, even when a person is sitting on their back. An approaching horse passing along a trail provides sound rhythms in the cadence

of a four-footed hoofed prey animal to wildlife, which informs wildlife of a non-threatening presence. For reptiles, rodents and other terrestrial life forms, the percussion pulse of the approaching horse provides warning. Being warned diminishes flushing/flight response that consumes wildlife energy. It is very common to find deer, bobcat and coyotes that allow horses to get within feet of them on trails before calmly moving off. Horses rarely step on lizards, mice and other fast moving wildlife. Slower moving wildlife can easily be avoided.

Bennett and Zuelke (1999) undertook an extensive review of recreation effects on birds and concluded that disturbance from recreation has temporary effects on behavior and movement of birds. Direct approaches caused greater disturbance than tangential approaches, rapid movement by joggers was more disturbing than slower hikers; children and photographers were especially disturbing, and passing or stopping vehicles were less disturbing than human foot traffic. Horses and riders did not disturb birds.

Sporadic human use can disturb wildlife. However, "many animals are less afraid of horseback riders than hikers. Riders seldom dismount to touch flora or fauna. Riders can be a dedicated and energetic volunteer and advocacy group. The horse-rider relationship promotes a non-anthropocentric worldview that facilitates ecological understanding. Horses are useful for patrols and surveys. Horse traffic can be used to maintain firebreaks and seldom-used trails." (Williams et al, 1998)

Horses in many ways may be more compatible with wildlife than other user groups.

Floristic Effects

There is no documented evidence of the horse spreading weeds. A Montana study by Tyser and Worley 1992 implicated timothy (*Phleum pratense*) and bluegrass (*Poa pratensis*) as species that had been included in past roadside seeding by the local highway authority. In California, the Department of Transportation (CalTrans) has recently been identified as the number one spreader of yellow star thistle by its past practices of scattering various weed-laden hays during roadside rehabilitation projects to control erosion.

It is unknown to what extent high quality livestock forage available contains weed seeds. However, most horse owners would not buy junk hay for their horses. Garbage in, poor performance out! The days of large populations of lower-grade, inexpensive stock horses ar long gone. Horses cost money, and the purchase price is only the down payment for ownership. Horsemen cannot afford to compromise their investments by feeding weedy hay. Responsible horse owners are concerned about getting quality feed that has been properly planted, harvested, and cured for their horse food dollar. Many horses are fed processed feedstocks. This is forage that is heated. The heat destroys weed seeds.

The horse has a very inefficient gut: it's a one-way through-put system. Horses are physiologically incapable of vomiting or regurgitating. If something gets stuck on the way through, the only way to get it out is by surgery or physical intervention (at arm's length!). As a consequence, horses must be fed carefully to avoid the common and potentially fatal condition of colic. The bulk of unprocessed forage consumed by California horses is alfalfa (Medicago sativa), rye grass (Lolium multiflorum or perenne), Timothy hay (Phleum pratense) and oat hay (Avena sativa (white cultivated oats)). If horses were a vector of

seed spread, these grasses could be prevalent in our open spaces and parks, but they are not. Nor are these forage feeds listed on the California Exotic Pest Plant Council web site at this time. Tamarisk, knapweed, thistles, etc., are the big culprits. Horses do not eat these species, many of which are actually toxic to the equine.

Trail Effects

In a 5-year study, Summer (1990, 1996) concluded that horse traffic was not the single, dominant process active on trails. Trail degradation was a function of landform, climatic and catastrophic events, and geomorphic processes. Seasonal use was important in keeping the soil exposed and vegetative cover absent on trails. Such processes as sheetwash, rilling, gullying and soil creep actively modified and eroded the trails and resulted in a measurable fluctuating rate of change over time. Limited data suggested that foot traffic produced effects similar to horse traffic in exposing the trail to the effects of geomorphic process or climatic events. Intensive runoff resulting form natural events can cause significant geomorphic change in a trail from such processes as gullying and earth slumps. Erosion from these events may overshadow effects of horse use on trails

Williams et al 1998 concur that factors other than user type are more closely linked to trail degradation. Lightly used trails may grow over and require more maintenance, whereas moderate horse activity may help to maintain a multiple-use trail. The bottom line is that horse trails can be maintained on most natural preserves without unacceptably impacting ecological values.

CONCLUSION

The horse is no worse than, and in some respects may be better than other lightweight low impact users in terms of effects on trails. If the horse is a consumptive user, then so too is every lightweight low impact user because we all have some effect by our presence on trails. We suggest that the term "consumptive" should be avoided. As we have shown, the presence of the horse as a lightweight, low impact user on single-track trails does not pose a significant risk to fauna, flora or the trails themselves.

Regards from

Adda Quinn

REFERENCES

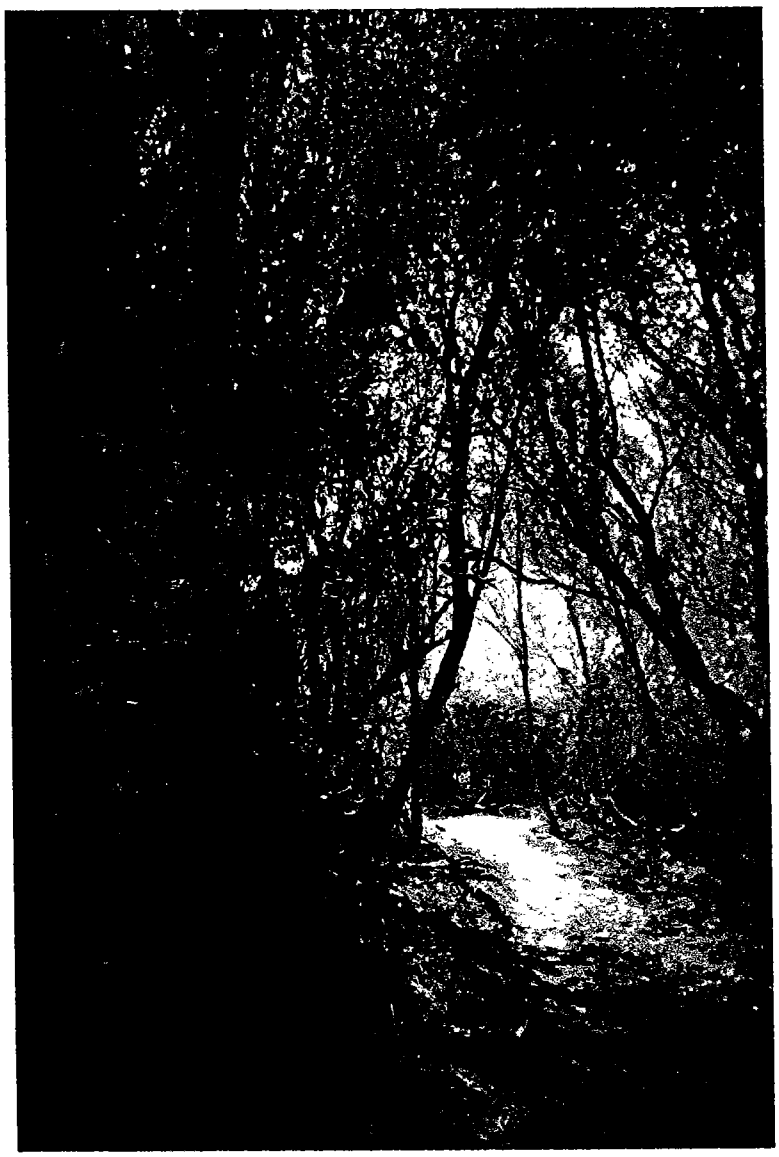
Bennett, KA and E. Zuelke . 1999. The effects of recreation on birds: a literature review. Delaware Natural Heritage Program, Smyma, DE 1977.

Summer, RM. 1996. Geomorphic Impacts of horse traffic on montane landforms 41(2): 126-128.
Summer, RM. 1980. Impacts of horse traffic on trails in RMNP. J. Soil and Water Cons. 35(2): 85-87.

Tyser, RW and CA Worley. 1992. Alien flora in grasslands adjacent to road and trail corridors in Glacier National Park, Montana USA. Conservation Biology 6:253-262.

Williams, B. and L. Conway-Durver. "HORSE TRAILS IN ECOLOGICAL RESERVES" presented at Clemson University Horse Trails Symposium, 1998. Mr. Williams holds a BS Degree in Forestry from Clemson University. He worked for the U.S. Forest Service as a River Ranger on the Sumter National, organized the Association of Forest Service Employees for Environmental Ethics and is the Executive Director of the Chattooga River Watershed Coalition.

" EXHIBIT C "



"EXHIBIT D"

---------- */THIS SEARCH THIS DOCUMENT GO TO/ Next Hit Forward New Bills Search Prev Hit Back HomePage Hit List Best Sections Help Contents Display * ---------- *Bill 4 of 4 * There are 3 other versions of this bill. GPO's PDF Display Congressional Record References Bill Summary & Status /Printer Friendly Display/ - 8,773 bytes.[Help] ---------- *Right-to-Ride Livestock on Federal Lands Act of 2004 (Referred to Senate Committee after being Received from House)* HR 2966 RFS 108th CONGRESS 2d Session * H. R. 2966 * * IN THE SENATE OF THE UNITED STATES * September 22, 2004 Received; read twice and referred to the Committee on Energy and Natural Resources ---------- * AN ACT * To preserve the use and access of pack and saddle stock animals on public lands, including wilderness areas, national monuments, and other specifically designated areas, administered by the National Park Service, the Bureau of Land Management, the United States Fish and Wildlife Service, or the Forest Service where there is a historical tradition of such use, and for other purposes. /Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled/, SECTION 1. SHORT TITLE. This Act may be cited as the `Right-to-Ride Livestock on Federal Lands Act of 2004'. SEC. 2. USE AND ACCESS OF PACK AND SADDLE ANIMALS ON PUBLIC LANDS. (a) National Park System Lands- Section 12 of Public Law 91-383 (16 U.S.C. 1a-7) is amended by adding at the end the following new subsection: `(c) Use and Access of Pack and Saddle Animals- `(1) General rule- The Secretary of the Interior shall provide for the management of National Park System lands to preserve and facilitate the continued use and access of pack and saddle stock animals on such lands, including wilderness areas, national monuments, and other specifically designated areas, where there is a historical tradition of such use. As a general rule, all trails, routes, and areas used by pack and saddle stock shall remain open and accessible for such use. The Secretary may implement a proposed reduction in the use and access of pack and saddle stock animals on such lands only after complying with the full review process required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). `(2) Rules of construction- Nothing in paragraph (1) shall be construed-- `(A) to authorize the Secretary to refuse to issue a permit for a new use of pack and saddle stock animals, including use by a commercial outfitter or guide, without complying with applicable resource management plans and planning processes required under this Act or any other provision of law; `(B) to limit the authority of the Secretary to impose a temporary emergency closure of a trail, route, or area to pack and saddle stock animals or issue special permits; or `(C) to create a preference for one recreational use for any unit of the National Park System, without consideration of the stated purpose of the unit.'. (b) Bureau of Land Management Lands- Section 302 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1732) is amended by adding at the end the following new subsection: `(e) Use and Access of Pack and Saddle Animals- `(1) General rule- The Secretary shall provide for the management of public lands to preserve and facilitate the continued use and access of pack and saddle stock animals on such lands, including wilderness areas, national monuments, and other specifically designated areas, where there is a historical tradition of such use. As a general rule, all trails, routes, and areas used by pack and saddle stock shall remain open and accessible for such use. The Secretary may implement a proposed reduction in the use and access of pack and saddle stock animals on such lands only after complying with the full review process required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). `(2) Rules of construction- Nothing in paragraph (1) shall be construed-- `(A) to authorize the Secretary to refuse to issue a permit for a new use of pack and saddle stock animals, including use by a commercial outfitter or guide, without complying with applicable resource management plans and planning processes required under this Act or any other provision of law; `(B) to limit the authority of the Secretary to impose a temporary emergency closure of a trail, route, or area to pack and saddle stock animals or issue special permits; or `(C) to create a preference for one recreational use for any area of the public lands, without consideration of the stated purpose of the area.'. (c) National Wildlife Refuge System Lands- Section 4(d) of the National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd(d)) is amended by adding at the end the following new paragraph: `(5)(A) The Secretary shall provide for the management of System lands to preserve and facilitate the continued use and access of pack and saddle stock animals on such lands, including wilderness areas, national monuments, and other specifically designated areas, where there is a historical tradition of such use. As a general rule, all

trails, routes, and areas used by pack and saddle stock shall remain open and accessible for such use. The Secretary may implement a proposed reduction in the use and access of pack and saddle stock animals on such lands only after complying with the full review process required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). `(B) Nothing in subparagraph (A) shall be construed-- `(i) to authorize the Secretary to refuse to issue a permit for a new use of pack and saddle stock animals, including use by a commercial outfitter or guide, without complying with applicable resource management plans and planning processes required under this Act or any other provision of law; `(ii) to limit the authority of the Secretary to impose a temporary emergency closure of a trail, route, or area to pack and saddle stock animals or issue special permits; or `(iii) to create a preference for one recreational use for any unit of the System, without consideration of the stated purpose of the unit.'. (d) National Forest System Lands- Section 15 of the Forest and Rangeland Renewable Resources Planning Act of 1974 (16 U.S.C. 1613) is amended-- (1) by inserting `(a)' before `Regulations'; and (2) by adding at the end the following new subsection: `(b) Use and Access of Pack and Saddle Animals- `(1) General rule- The Secretary shall provide for the management of National Forest System lands to preserve and facilitate the continued use and access of pack and saddle stock animals on such lands, including wilderness areas, national monuments, and other specifically designated areas, where there is a historical tradition of such use. As a general rule, all trails, routes, and areas used by pack and saddle stock shall remain open and accessible for such use. The Secretary may implement a proposed reduction in the use and access of pack and saddle stock animals on such lands only after complying with the full review process required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). `(2) Rules of construction- Nothing in paragraph (1) shall be construed-- `(A) to authorize the Secretary to refuse to issue a permit for a new use of pack and saddle stock animals, including use by a commercial outfitter or guide, without complying with applicable resource management plans and planning processes required under this Act or any other provision of law; `(B) to limit the authority of the Secretary to impose a temporary emergency closure of a trail, route, or area to pack and saddle stock animals or issue special permits; or `(C) to create a preference for one recreational use for any unit of the National Forest System, without consideration of the stated purpose of the unit.'. (e) Issuance of Rules- Not later than 120 days after the date of the enactment of this Act, the Secretary of the Interior and the Secretary of Agriculture shall issue final rules to define the meaning of a historical tradition of use of pack and saddle stock animals on Federal lands for purposes of the amendments made by this section. Passed the House of Representatives September 21, 2004. Attest: JEFF TRANDAHL, Clerk.

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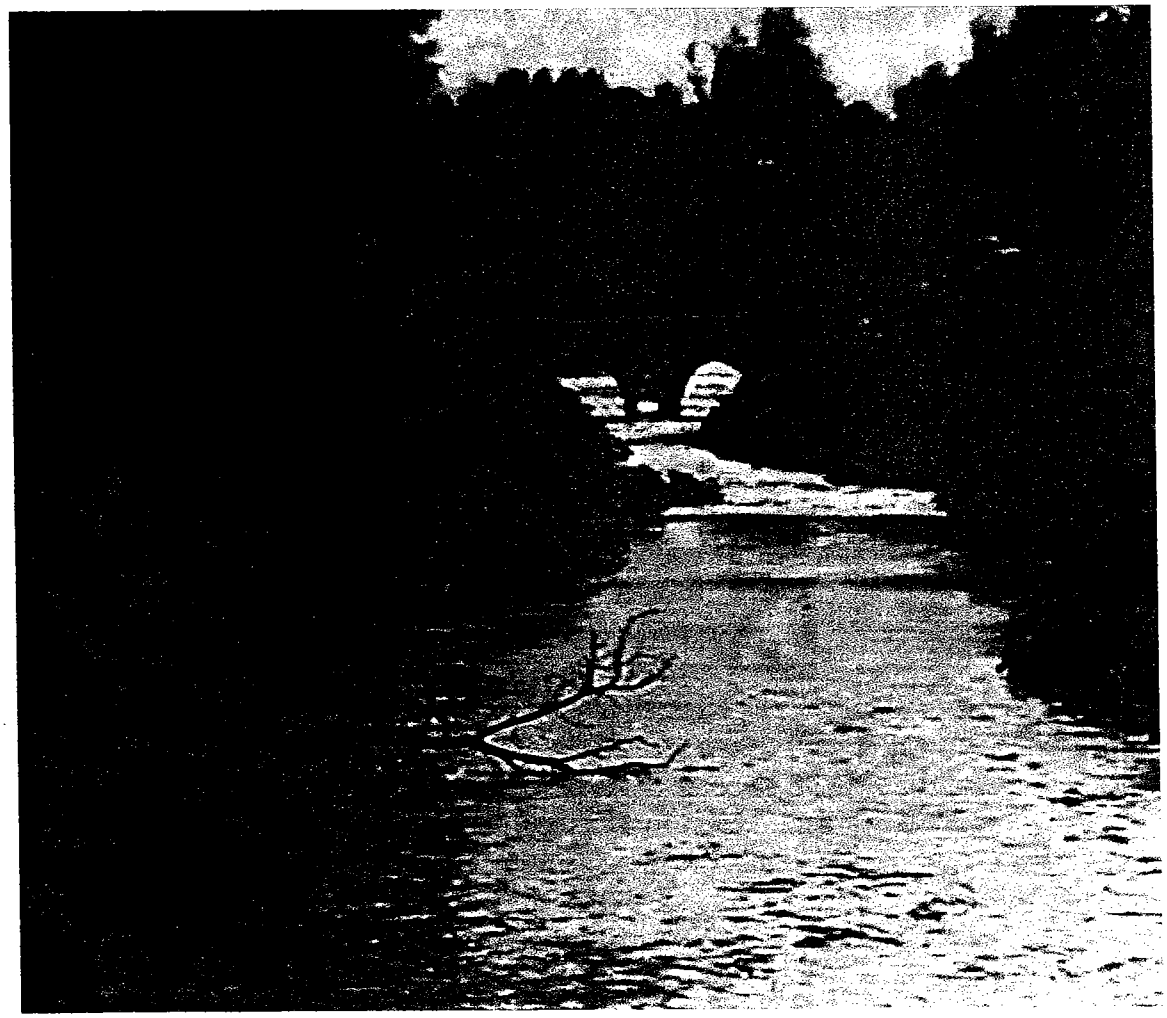
"EXHIBIT F"



Citizens Against Recreational Eviction-USA

8315 Windsong Drive Eden Prairie, MN 55344
Telephone 952.975.0017

November 3, 2004

Maeva Hanley, M.S.
Environmental Resource Manager
Department of Parks & Recreation
5201 Ruffin Road, Suite P (MS029)
San Diego, CA 92123

Dear Madam;

Please accept the following comments on the proposed Tijuana River Valley Regional Park Trails and Habitat Enhancement Project. As a past president of the Tijuana River Valley Equestrian Association, I have a long history of working cooperatively with the Landowners and Agencies who control land use in the Tijuana River Valley. As a representative of the recreational trails community, I have several serious concerns regarding the proposed project. We, who have worked to establish and maintain a viable trail system in the Tijuana River Valley Regional Park (TRVRP) since long before the TRVRP was established, are extremely distressed and angered to read in the published Notice of Preparation that, in spite of countless hours of meetings, hiking trails to determine the most viable alignments, and written documents that were signed by all the land management agencies and local recreational groups that "no recreational trail network is permitted through the California Environmental Quality Act in the Tijuana River Valley Regional Park". In view of the tremendous commitments of time and resources that have been applied to attempts to resolve this issue, we find this current effort to be redundant and unfair and, perhaps, illegal misrepresentation of the recreational trail network in the TRVRP.

There is a long history of equestrian use of the lands that are now part of the TRVRP. The original Border Field State Park Resource Assessment, written when land at the western end of the Valley was acquired by the California Department of Parks and Recreation, indicates a long established trail system in the Valley. Each new iteration of management planning documents regarding conditions in the Valley refers to equestrian trails and activities as a major land use, regardless of land ownership.

The riparian corridor that is of such concern has primarily been established through changes in land use and groundwater levels in the Valley. There is a distinct possibility that removal of the meandering interior equestrian trails from the riparian corridor will have negative impacts on the endangered species found there. The removal of existing trails will lead to overly dense willow thickets that will mature to late successional forest that does not meet the habitat niche the least Bell's vireo prefer for nesting and foraging sites. This presents the unintended consequence of loss of habitat for this endangered species. Removal of trails from the riparian corridor removes legitimate use from areas than will inevitably become areas available for illegal activities, such as, vagrant living areas, illegal immigrant staging areas and an increased potential growing of illegal substances, such as, marijuana. Trends on other public lands show that a lack of legitimate access and activities leads to increased illegitimate uses.

We are very concerned about the proposed six foot wide multiple use trail network. It presents serious safety hazards for all user groups. Multi-directional trails must have adequate line of sight standards that serve to create straight-line unshaded trails that will not provide a satisfying trail experience. Straight line trails tend to encourage speed which creates an immediate hazard

Citizens Against Recreational Eviction-USA

between user groups. Equestrians and hikers tend to travel at a much slower rate of speed than bicyclists. This creates a hazard. Many hikers and bicyclists have little experience with the behavior of livestock. They tend to have no idea what a horse's reaction will be when suddenly confronted with oncoming traffic. This creates a serious hazard, especially with bicyclists as they tend to travel faster and horses usually do not perceive them as non-threatening without significant training.

Loss of trail alignments that are located away from even minimally used roadways, such as, Sunset and Saturn Boulevard will seriously increase safety hazards and user conflicts. Many of the so-called haphazard and unplanned trails have occurred over time due to real and perceived safety issues. We strongly recommend that all trails be carefully reviewed and that local historical data be complied as to why these trails have developed. When effective research is done concerning the development of these trails there are often very good reasons why they have been developed. They may have been rerouted due to dangerous conditions that occur infrequently when the water table is exceptionally high or a number of other safety related reasons.

The trail that extends from the end of Saturn Boulevard to Monument Road appears to qualify as an RS2477 roadway. The County of San Diego has made an RS2477 assertion, so this trail must be protected and maintained as a trail unless this alignment has been formally abandoned or vacated by the County.

It appears from the maps included that in many cases the multiple use trails will be located along existing transportation corridors. This directly creates negative impacts on the trail user. Most trail users choose this activity to escape the urban setting. A trail along an existing transportation corridor defeats this purpose

Due to changing conditions throughout San Diego County both short term and long range planning for TRVRP needs to address increased equestrian trails and activities rather than decreasing trails and trail amenities. There is increased interest on the federal level for expanding trail opportunities for the American public. The ideal is that no one should be more than fifteen minutes from a trail that can meet fitness and recreational needs.

Please outline the criteria used to determine habitat degradation and deterioration of natural resources and show how they have been applied to the trails in the TRVRP. Thank you for the opportunity to comment on this Notice of Preparation.

Sincerely,

Candace D. Oathout

Candace D. Oathout
Chair, Care-USA
National Legislative Representative, Warrior's Society
Member, Backcountry Horsemen of California

Citizens Against Recreational Eviction - USA

2004 NOV 4 AM 10 09

Fax

To:	Maeve Hanley, M.S.	**From:**	Candace D. Oathout
Fax:	858-495-5841	**Pages:**	2 pages plus cover sheet
Phone:	858-694-2968	**Date:**	11/3/2004
Re:	Tijuana River Valley Regional Park Trails And Habitat Enhancement Project	**CC:**	[Click **here** and type name]

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- **Comments:**

California Department of Transportation – District 11
Planning Division – Development Review
P. O. Box 85406 (M.S. 50)
San Diego, CA 92186-5406

Attn: Brent C. McDonald
(619) 688-6819
FAX: 688-4299
brent.mcdonald@dot.ca.gov

Caltrans

Fax

To:	Maeve Hanley SD County Parks & Rec.	**From:**	Brent C. McDonald
Phone:	(858) 694-2968	**Pages:**	3 (incl. cover sheet)
Fax:	(858) 495-5841	**Date:**	November 2, 2004
Re:	Tijuana River Valley Regional Park Trails and Habitat Enhancement Project – NOP for a Draft EIR	**cc:**	Scott Morgan State Clearing House

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Comments:

(hard copy to follow via regular mail)

San Diego County Dept. of Parks and Recreation
SCH 2004091159

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299

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November 2, 2004

11-SD-005
PM 2.31

Ms. Maeve Hanley
SD County Dept. of Parks & Recreation
5201 Ruffin Road, Suite 'P'
San Diego, CA 92123

RE: NOP for a Draft EIR – Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (SCH 2004091159)

Dear Ms. Hanley:

The California Department of Transportation (Department) appreciates the opportunity to review the Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) for the Tijuana River Valley Regional Park Trails and Habitat Enhancement Project, located immediately west and south of Interstate 5 (I-5) at Dairy Mart Road. In general, the Department supports the County's plans to construct a network of safe, continuous, interconnected trails in order to allow residents to choose alternative modes of transportation. An interconnected trail network may help to increase mobility and reduce traffic and congestion on local roads and State transportation facilities by providing functional alternatives to the automobile. In addition, trails can have a positive effect on residents' "quality of life" by providing convenient and safe recreational opportunities.

Department Deputy Directive 64 (DD-64, "Accommodating Non-Motorized Travel") supports the development of non-motorized facilities and access along Caltrans Right of Way (R/W). However, any work that may involve access, storage, staging, or other activities occurring within Department R/W will require an encroachment permit. Furthermore, the indirect effects of any mitigation within Department R/W must be addressed. The developer will be responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and/or resource agencies. For example, the applicant would need to obtain a Coastal Development Permit for work within the R/W at I-5 / Dairy Mart Road prior to the Department's issuance of an encroachment permit. Information regarding encroachment permits may be obtained by contacting the Permits Office at (619) 688-6158. Early coordination with the Department is strongly advised for all encroachment permits.

It is important to design trails with the user in mind. If multipurpose trails are primarily to serve bicycle travel, then they should be developed in accordance with standards for Class I Bikeways. However, use of trails can vary from recreational, hiking, shared-use, bike, mountain bike, equestrian, all terrain vehicles (ATVs), off-highway vehicles, and motorcycles. Caltrans Highway Design Manual (HDM) Chapter 1000 provides guidance for the planning and design of non-motorized facilities and access. For any non-motorized facilities to be located within Department R/W, the design guidelines set forth in HDM Chapter 1000 must be adhered to. Design standards for multipurpose trails are discussed in Section 1003.5. The HDM Chapter 1000 (Bikeway Planning and Design) may be found on the internet at URL: http://www.dot.ca.gov/hq/oppd/hdm/pdf/chp1000.pdf

The US Department of Transportation (USDOT) / Federal Highway Authority (FHWA) provides guidance on Trail Planning and Design as well as conflicts encountered in trail design. The publication entitled *Designing Sidewalks and Trails for Access* can be found on the web at the following URL: http://www.fhwa.dot.gov/environment/bikeped/access-1.htm In Chapter 5, entitled "Trail Design for Access," FHWA discusses conflicts encountered in trail design such as access control, built facilities along trails, trails amenities for multiple user groups, drainage control measures, complying with design standards including ADA, difficulty ratings for trails, etc.

The entrances and exits to and from paths / trails can sometimes create conflicts in crossing, especially in or near urban or community areas. Bollards may be placed at entrances and exits to/from paths to keep vehicles from entering paths. Trail signs can help show users appropriate trail etiquette. Right of way / yield signs – showing bikes yielding to hikers, and both bikes and hikers yielding to equestrians – are fairly standard on multi-use trails.

Thank you for the opportunity to review this project proposal. For questions regarding the Department's non-motorized program, please contact Dan Gallagher at (619) 688-2597 or James Floyd at (619) 688-3140. For specific questions regarding I-5 South, please contact Erwin Gojuangco at (858) 616-6671. For specific questions regarding Environmental issues, please contact Jason Reynolds at (858) 616-6609. If you have general questions on the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,

for MARIO H. ORSO, Chief
Development Review Branch

COMMITTEES
CHAIR, HOUSING & COMMUNITY DEVELOPMENT
AGRICULTURE & WATER RESOURCES
BUDGET & FISCAL REVIEW SUBCOMMITTEE #4
BANKING, COMMERCE & INTERNATIONAL TRADE SUBCOMMITTEES:
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California State Senate

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DENISE MORENO DUCHENY
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FISCAL RESTRUCTURING
IMMIGRATION AND THE ECONOMY
MOBILE AND MANUFACTURED HOMES
JOINT COMMITTEE
PREPARING CALIFORNIA FOR THE 21ST CENTURY
MEMBER, COMMISSION OF THE CALIFORNIAS

November 3, 2004

Maeve Hanley, Environmental Resource Manager
San Diego County Department of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

RE: Tijuana River Valley Regional Park Trails and Habitat Enhancement Project (NOP)

Dear Ms Hanley:

I am writing to express my concerns about the proposed Tijuana River Valley Trails and Habitat Enhancement Project as presented on October 25, 2004. The County of San Diego's of Tijuana River Valley (TRV) is comprised of agricultural, biological, cultural and historical resources and recreational opportunities. Together they play an important role in the vitality and history of the region.

The TRV has a long history of agricultural production within its borders. Based on a March 31, 1953 photograph provided by the Natural Resources Conservation Service, agricultural production comprised over 90% of the TRV's land use. The further reduction of agricultural land proposed by this project would negatively affect the long agrarian history of the region. Scientific and amateur wildlife enthusiasts have documented the usage of farmlands as resting and feeding grounds for migratory birds. Reducing this important resource for migrating animals would be a tragedy.

The proposed project's environmental habitat and biological resources restoration plan is ambitious. The restoration of native species habitat is extremely important to the region and state. As we are all fully aware, the TRV is an endangered species and sensitive habitat area, surrounded by burgeoning development. The County of San Diego should implement protections to preserve and protect the land, while at the same time allowing for both active and passive recreation.

CAPITOL OFFICE
STATE CAPITOL, ROOM 2062
SACRAMENTO, CA 95814
PH (916) 445-6767
FAX (916) 327-3522

CHULA VISTA OFFICE
637 3RD AVENUE, SUITE C
CHULA VISTA, CA 91910
PH (619) 409-7690
FAX (619) 409-7688

IMPERIAL VALLEY OFFICE
1224 STATE STREET, SUITE D
EL CENTRO, CA 92243
PH (760) 335-3442
FAX (760) 335-3444

COACHELLA VALLEY OFFICE
53990 ENTERPRISE WAY, SUITE 14
COACHELLA, CA 92236
PH (760) 398-6442
FAX (760) 398-6470

The County of San Diego has the responsibility to balance its preservation actions with that of recreational usage. Recreational uses, including horseback riding, hiking, and bicycle riding are important to the history as well as the future of the valley. The TRV is one of the last locations within California that equestrians can ride through coastal chaparral to the Pacific Ocean. As an equine supporter, I must express my concern about the proposed multi-use trail. Horses in all of their strength and great size are still prey animals, and can be extremely "skittish" when startled. The proposed multi-use trail can potentially create unsafe riding conditions for the horses, pedestrians, hikers and bike riders.

Of particular concern to local equestrians is the interaction between bicyclists and horses. There ought to be a way to make a trail that reduces the bike/horse interaction, while still reducing the redundancy of trails within the valley.

The need to balance all of the agricultural, biological, cultural and recreational opportunities in the valley is critical. The current plan restricts the parks' usage to primarily environmental protection. Environmental habitat is important, but there needs to be a balance between all of the current and future uses within the TRV.

I look forward to your responses to these concerns.

Sincerely,

Denise Moreno Ducheny
State Senator, 40th District

DMD/jmh

CALIFORNIA LEGISLATURE
DENISE MORENO DUCHENY
STATE SENATOR
637 3RD AVENUE, SUITE C
CHULA VISTA, CA 91910

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Maeve Hanley, Environmental Resource
Manager
San Diego County Department of Parks &
Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

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California Native Plant Society

San Diego Chapter P.O. Box 121390 San Diego, CA 92112

Ms. Mauve Hanley
San Diego Department of Parks and Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

November 3, 2004

Re: Notice of Preparation of a Draft Environmental Impact Report for Tijuana River Valley Regional Park, Trails and Habitat Enhancement Project

Members of the San Diego Chapter of the California Native Plant Society attended the public scoping meeting held for the Draft Environmental Impact Report for Tijuana River Valley Regional Park for the Trails and Habitat Enhancement Project. As you are aware, the Tijuana Estuary and Tijuana River Valley are identified as Core Biological Areas under the Multiple Species Conservation Program (MSCP). As such , the bulk of the area was largely committed as preserve lands with the primary focus being the preservation of biological resources. We ask that all alternatives be subject to analysis of impacts, not just the preferred alternative as Border Patrol and a more extensive Equestrian alternative are both likely to entail greater impacts to sensitive resources.

According to the City of San Diego's MSCP plan, areas within the 25-year floodplain , currently leased for agriculture are expected to remain in these uses for up to 10 years, depending on flooding and other considerations. However, in the long-term these areas will be evaluated for restoration and widening of the riparian corridor consistent with the County's Management Framework Plan and the MSCP. A buffer is to be maintained around all wetland areas. Existing agricultural uses on Spooner's Mesa have a long-term goal of conversion to Coastal sage scrub, Maritime succulent scrub, or Native grassland. Agricultural use of lands on County-owned lands have a long-term goal of phased restoration to native vegetation where possible, consistent with the County's Management Framework Plan. Riparian habitat along the Tijuana River is to be retained and enhanced where possible.

The trails network proposed at the County's scoping meeting appears to go a long ways towards achieving some of the listed requirements for the Tijuana River area. Joint use trails provide the best way to assure access to areas while minimizing impacts. We thank you for proposing to minimize the acreage currently involved with trails in the plan area. Trails and facilities must be sited so that they do not degrade the habitat value and water quality of the area. Flooding and erosion impacts must be avoided in trail design and placement. Unfortunately the plan seems to be ignoring the requirements for access to the border area by the Border Patrol. Ignoring the issue will not make the problem go away.

The maps provided at the scoping meeting seemed to be missing some species. Within the County's planning area Baja birdbush (*Ornithostaphylos oppositifolia*) is known from additional areas that were not mapped on the mesa slopes to the west of that mesa and

Rayless ragwort (*Senecio aphanactis*), Goldenspined cereus (*Bergerocactus emoryi*), Seaside calandrinia (*Calandrinia maritima*), Lewis' evening primrose (*Camissonia lewisii*), Cliff spurge (*Euphorbia misera*), Snake cholla (*Opuntia parryi* var *serpentina*), Coast white lilac (*Ceanothus verrucosus*), Barrel cactus (*Ferocactus viridescens*), Orcutt's bird's-beak (*Cordylanthus orcuttii*), and South coast saltscale (*Atriplex pacifica*) are known or likely to occur on the mesas and slopes in the plan area. Orcutt's dudleya (*Dudleya attenuatta* ssp. *orcuttii*), Brand's phacelia (*Phacelia stellaris*), Nuttall's lotus (*Lotus nuttalianus*), and Beach goldenaster (*Heterotheca sessiliflora* ssp *sessiliflora*) are located to the west of the plan area and could be found within the plan area.

We ask that revegetations include expansion of all of these rare species as well as the rare habitats such as riparian and saltmarsh wetlands, Maritime succulent scrub, Native grasslands, and Coastal sage scrub. Look to the eastern slope of Bunker Hill to see an example of a wonderful Native grassland that would serve as a seed source for restoration work on grasslands. Please ensure that restoration efforts utilize local seed sources.

Equestrian use of the Tijuana River Valley is expected to continue. As such issues involving weed introductions and animal waste need to be addressed by the plan. Yellow star thistle has expanded throughout much of the state partly associated with animal feed. The National Forest Service, Bureau of Land Management, and the National Park Service have Weed Free Feed policies to help prevent the spread of invasive species in our natural landscapes. Agencies suggest that horses be purged for 12 hours by the feeding of California certified weed free feed. We would suggest such a policy be explored for this sensitive biological area. Please see websites such as
www.extendinc.com/weedfreefeed/index.htm and
www.fs.fed.us/r5/tahoe/documents/veg/weedfree_forage_cert.htm
for more information on the topic. A local example of the issue would be *Lepidium latifolium* invasion in the Lake Hodges/San Pasqual area. The species was believed to be brought into the drainage in feed and has spread explosively through the drainage. Large sums of public money are being used to attempt to control the spread of the species. A brochure discussing the topic needs to be provided to people planning on using the area for equestrian use.

People have learned to pick up after their dogs and people can learn to pick up after their horses. A regular trail cleanup day to remove animal waste should be developed for the area to ensure the area can comply with water quality requirements and hopefully eliminate the need for publically funded cowbird trapping programs. We presume that the human waste issues in the area will eventually be dealt with appropriately.

Basic elements of Management Plans on preserve lands identified in the County's Subarea Plan include: fire management, fencing and gates, access road maintenance, trail maintenance, signage and lighting, trash and litter removal, hydrological management, species monitoring, vector control and herbicide use, point source drain water, biological surveys, removal of invasive species, predator control, restoration needs, vehicle and facility expense, ranger patrol, visitor and interpretive services, volunteer services,

poaching control, habitat restoration, species management conditions, noise, and non-point source urban runoff.

Given the extensive trails network throughout the plan area, extensive restoration of upland and wetland habitat will be required with this project. Will success criteria be established for each subunit for species and habitat? Will bonding be required? Many of the rare species listed previously have limited coastal distributions or this is the northern-most extent of the species distribution. As such, although a species may not be listed, its monitoring and management is critical for the species. Please list the priority of management actions for the various species.

Both the Tijuana River and the Tijuana River Estuary are currently on the federal Clean Water Act, Section 303(d) list of impaired waters <http://www.swrcb.ca.gov/tmdl/303d_lists.html>. The waters on the Section 303(d) list do not meet water quality standards (e.g., the beneficial uses of water, water quality objectives and criteria, and the non-degradation policy as listed in the Water Quality Control Plan for the San Diego Basin (9) (Basin Plan). <http://www.swrcb.ca.gov/rwqcb9/programs/basinplan.html>

Pollutants and stressors for the Tijuana River and the Tijuana River Estuary include the following:

Clean Water Act, Section 303(d) pollutants and stressors	
Tijuana River	*Tijuana River Estuary*
Bacteria Indicators	***Bacteria Indicators***
Eutrophic	***Eutrophic***
Low Dissolved Oxygen	***Low Dissolved Oxygen***
Pesticides	***Pesticides***
Solids	***Thallium***
Synthetic Organics	***Nickel***
Trace Elements	***Lead***
Trash	***Trash***

The Environmental Impact Report (EIR) should describe the management practices and measures that will be put in place to protect the beneficial uses of the Tijuana River and Tijuana River Estuary. How will water quality stressors (e.g., horse manure) be controlled in the future to ensure that the water quality objectives (e.g., biostimulatory substances, bacteria, dissolved oxygen, and so on) for the Tijuana River and Tijuana River Estuary are met? How will erosion and channeling of water on trails be minimized?

Thank you for your attention to these concerns.

Sincerely,

Cindy Burrascano

Cindy Burrascano

FGC - 670.1 (3/94)

A PETITION TO THE STATE OF CALIFORNIA FISH AND GAME COMMISSION

For action pursuant to Section 670.1, Title 14, California Code of Regulations (CCR), and sections 2072 and 2073 of the Fish and Game Code, relating to listing and delisting endangered and threatened species of plants and animals,

I. SPECIES BEING PETITIONED:

Common Name: **Baja California birdbush or Baja birdbush or Palo Blanca**

Scientific Name: ***Ornithostaphylos oppositifolia*** **(C.Parry) Small**

II. RECOMMENDED ACTION:

_x_ List

_x_ as Endangered

__ as Threatened

__ Delist

__ Change Status

from _____

to _____

2004 NOV 4 AM 9 06

III. AUTHOR OF PETITION:

Name: Cindy Burrascano
Address: 771 Lori Lane
Chula Vista, CA 91910
Telephone Number: H (619) 421-5767; W (619) 812-7023

I hereby certify that, to the best of my knowledge, all statements made in this petition are true and complete.

Signature: Cynthia Burrascano

Date: March 25, 1999

1. Population Trends

The current population of Baja California Birdbush in the United States is 103 plants in one occurrence. The number of plants in the occurrence was determined by the petitioner walking Spooner's Mesa and surrounding slopes in the Tijuana Hills bounded by Monument Road on the north, Dairy Mart Road on the east, the United States border on the south, and the drainage known as Smuggler's Gulch on the west. No historical data was located for population density. Reiser in *Rare Plants of San Diego County* reports the species is declining in its one United States locale (Reiser, 1994). U.S. Border Patrol activities, including their preference for the clearance of brush near the border fence is sited by Reiser as the reason for the decline. Botanists asked about the population size have tended to estimate the population at 20 individual shrubs but the sparse distribution for the plant sometimes in dense habitat has probably led to an underestimation of the population size. Seedlings were not located in 1998 or 1999 surveys.

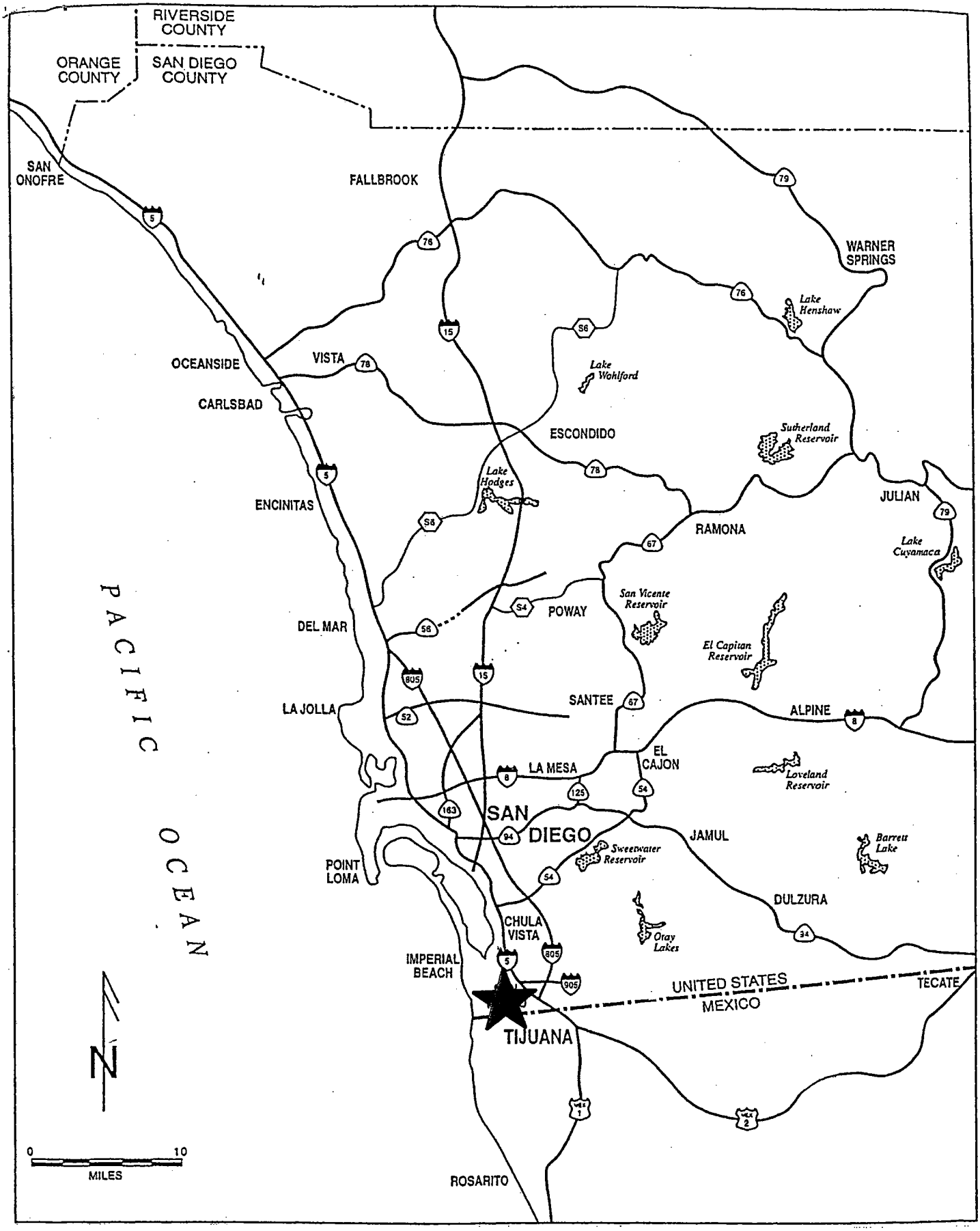
2. Range and Distribution

The species and genus is known from only one locality in the United States adjacent to the US-Mexico border at Boundary Monument 256 in the Tijuana Hills on a mesa locally known as Spooner's Mesa and the adjacent slopes. Please note that the Imperial Beach Quad of the USGS maps reports Spooners Mesa as being the tilled agricultural mesa west of Smuggler Gulch, not the mesa described here as Spooner's Mesa. The population is located at latitude 32° 32' 21" and longitude 117° 04' 41". Plants exist in an area of approximately 1.25 square miles with the area which supports the plants bounded by the slopes to Smuggler's Gulch on the west, the border fence on the south, the mining operation on the east, and the upper slopes overlooking Monument Road to the north. The species is a CNPS List 2 species (Skinner, 1994) meaning it is rare, threatened, or endangered in California but is more common elsewhere (Baja California, Mexico). It has a RED Code of 3-3-1 meaning it is distributed in one to several highly restricted occurrences (1), it is endangered throughout its range, and is more widespread outside California. The Natural Diversity Database has one occurrence for *Ornithostaphylos oppositifolia* in the Imperial Beach Quad at the location identified above (NDDB, 1998).

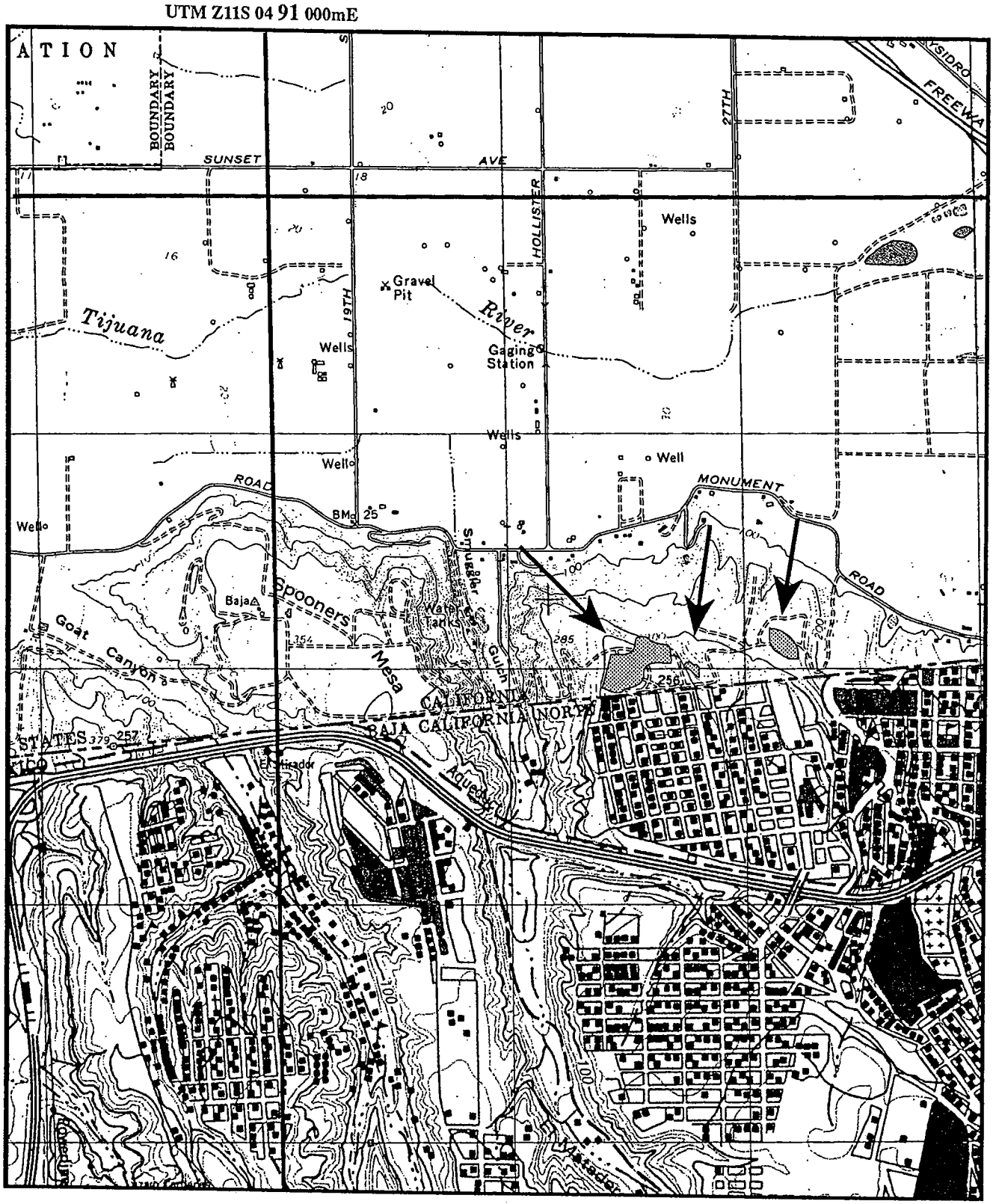
Habitat for the species is being lost to road proliferation and brush clearance for ease in scanning of the border area by U.S. Border Patrol on Spooner's Mesa in addition to cutting by illegal immigrants. Over the past 5 years, the mesa supporting the species has become more fragmented due to additional roads being created on the mesa and surrounding slopes. The rate of loss of intact habitat appears to be accelerating over the last year.

In a 1973

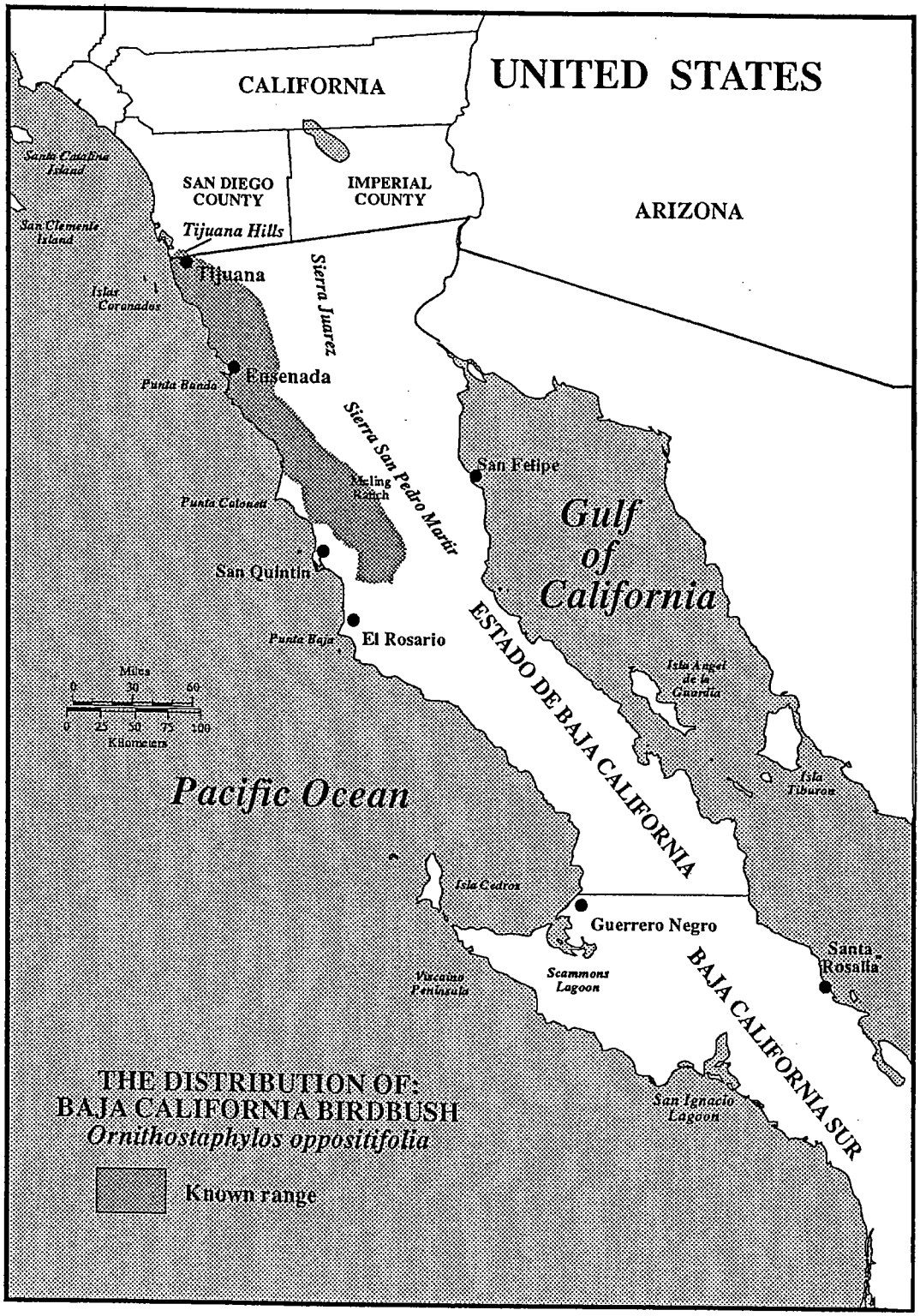
Madrono communication originally recording the species in the United States, Moran reported the species to be fairly common in chaparral in northwest Baja California, in the north towards the coast and down to 100 meters elevation, southward at 500 to 1200 meter on the west slope of the Sierra San Pedro Matir (Moran, 1973). It extended south at least to Rancho el Cipres (near 30° 23'N) and to the slopes above Agua Amarga (near 30° 28'N). Reiser reported the species may be fairly common near the immediate coast of

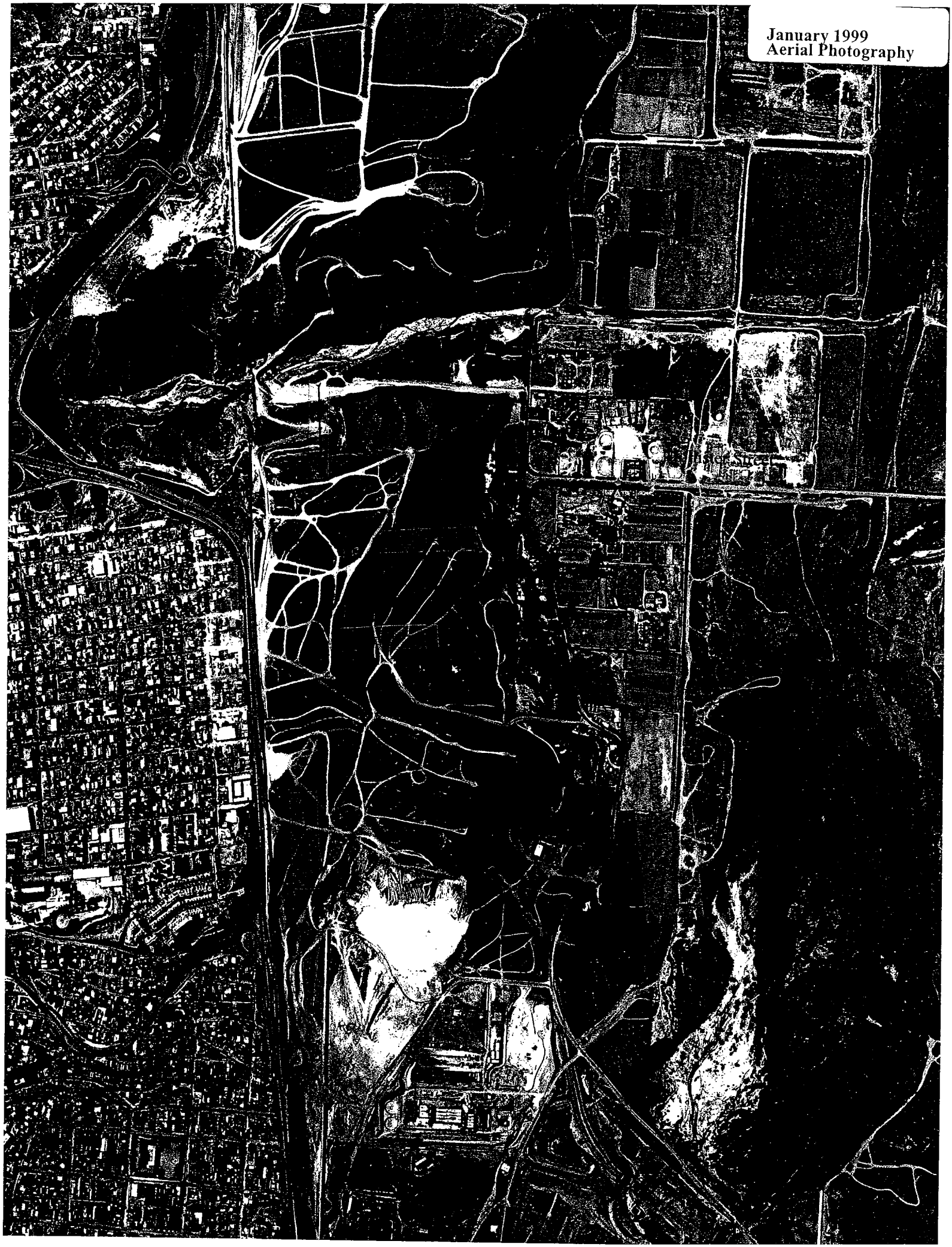


United States Distribution of
Ornithostaphylos oppositifolia



U.S. Distribution of Baja California birdbush (***Ornithostaphylos oppositifolia***) in the Tijuana Hills, Imperial Beach, 7.5 minute USGS quadrangel, San Diego County, California.


UNITED STATES
CALIFORNIA
ARIZONA
SAN DIEGO COUNTY
IMPERIAL COUNTY
Santa Catalina Island
San Clemente Island
Tijuana Hills
Tijuana
Islas Coronados
Sierra Juarez
Ensenada
Punta Banda
Sierra San Pedro Martir
Meling Ranch
Punta Colonet
San Felipe
Gulf of California
San Quintin
El Rosario
Punta Baja
ESTADO DE BAJA CALIFORNIA
Isla Angel de la Guardia
Isla Tiburon
Miles
0 30 60
0 25 50 75 100
Kilometers
Pacific Ocean
Isla Cedros
Guerrero Negro
Santa Rosalia
Viscaino Peninsula
Scammons Lagoon
BAJA CALIFORNIA SUR
San Ignacio Lagoon
THE DISTRIBUTION OF:
BAJA CALIFORNIA BIRDBUSH
Ornithostaphylos oppositifolia
Known range


January 1999
Aerial Photography

View North - East

View North - West

northern Baja California though he does not often see it on his forays (Reiser, personal communication). Vanderwier reported the species forms nearly pure stands in the foothills of the Sierra Juarez (Vanderwier, personal communication). Dossey reports a sparsely distributed stand south of Maneodaro, north of Saint Tomas along the main highway (Dossey, personal communication).

The San Diego Natural History Museum has four records for *Ornithostaphylos oppositifolia* in the United States but they all appear to be the same population. There are 40 records from Baja California, Mexico. Latitude ranges from 30 52N to 32 31N and longitude ranges from 115 17W to 116 56W for the Baja California populations .

The UC Berkeley herbarium has two collections of the species which appear to be from the same population and are similar to the San Diego Natural History Museum collections. Reid Moran collected the species on February 7, 1970 and Gary Wallace collected from the slopes of the same mesa on January 11, 1974. A specimen was also deposited at the Santa Barbara Botanic Garden Herbarium on April 1973 by Reid Moran and the San Jose State Herbarium on December 14, 1991 by C.W. Sharsmith from a collection from Buena Vista Nursery in Woodside (CalFlora Occurence Database, 1999).

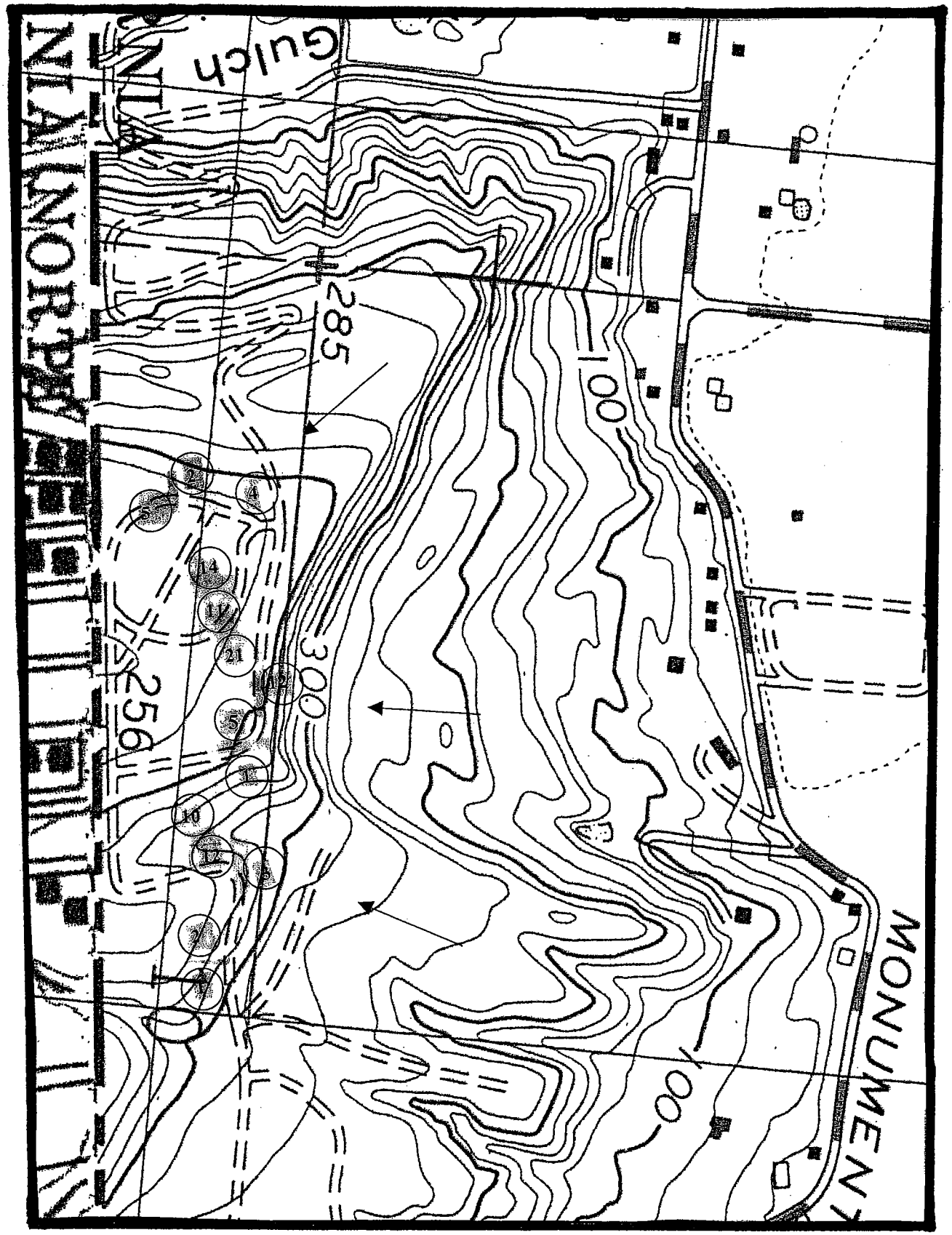
Habitat for the species appears adequate if road proliferation were halted and fire frequencies are not altered from their historical levels.

3. Abundance
60 plants were located in a nonsystematic walking survey of the mesa and some of the surrounding slopes in 1998 by the petition author and Rod Dossey. Shrubs were widely spaced over approximately 1.25 miles of mesa top and surrounding slope area. More rigorous surveying was conducted in March of 1999 and found 103 plants. The general survey area was bounded by a mining operation on the east with a thin strip of native vegetation between two border fences just south of the mined area being surveyed, Monument Road on the north, the border fence on the south, and Smuggler's Gulch (a large drainage area bordered on the west by a mesa previously used for crops). The area was walked in a systematic fashion such that all areas could be visually scanned. General location, width and height, and stem diameter was measured for each plant located. Old stump diameter was measured if applicable. A less rigorous survey by vehicle was conducted for Smuggler's Gulch, the slopes leading to the western tilled mesa, and the slopes of Goat Canyon to the west. Only the eastern mesa and upper slopes and drainages support the species as depicted on the enclosed distribution map. Shrubs are widely spaced over the mesa and upper slopes although up to four plants were sometimes in close proximity to each other.

Approximately 60% of the plants encountered had stem diameters under 3 cm and most of those showed evidence of stump sprouting. 10 plants were located with stem diameters of 10 cm or greater with the largest diameter measured at 12 cm. Most plants were under 2 meters in height although 23 plants were 2 meters or taller. The tallest plant located was

Excessive road clearance Southwest view

Excessive road clearance South view



Specific United States Distribution of
Ornithostaphylos oppositifolia

March 1999 Ornithostaphylos oppositifolia U.S. Survey

Height (cm)	Width (cm)	Thickest Branch (cm)	
160	194	2	
235	250	4	
298	360	8	(1-8cm) 4-6cm
60	119	1	
129	231	1.5	
154	229	2	
125	227	1	
130	172	2	
163	333	2	
142	175	2	
200	192	3	old 8cm burl
218	211	8	
174	208	0.75	old burl
227	188	3	
150	294		
172	212	9	
150	294	0.75	old 7cm burl
235	253	12	
298	177	5	
213	200	6	
170	130	2	
327	382	7	
182	198	3	
147	114	1	
130	145	1	
150	162	1.75	
163	103	2	
218	337	11	
140	245	1.5	
160	160	2	
211	446	11	
172	175	2	stump sprouted
129	245	2	
88	182	3	
195	224	3	
81	127	1	
133	160	3	
123	144	3	
126	334	2	
151	183	3	
158	365	4	
180	229	8	
184	233	4	
180	349	12	
177	160	3	
164	307	8	
147	113	2	
180	349	12	
165	59	3	
175	328	10	
165	167	3.5	

Height (cm)	Width (cm)	Thickest Branch (cm)	
165	104	8	
211	184	10	
170	211	6	
160	175	5	
234	165	4	
275	168	5	
169	275	4	
114	120	3.5	
142	180	11	
168	275	5	
150	273	6	
184	445	12	
105	148	1.5	
163	300	7	
134	300	4.5	
165	184	6	
165	372	7	
173	127	8	
174	216	10	
93	166	1.5	
134	250	2	
98	218	2	stump
134	250	2	stump
223	286	7	
129	212	1	
224	500	12	
300	320	6.5	
213	232	8	
208	300	8	
207	360	10	
220	292	9	
135	183	2	5cm stump
74	61	1.25	
91	135	2	
152	122	1.25	2.5cm stump
91	183	2	4cm stump
163	305	3	
104	196	2	
122	61	2.5	
104	152		
46	91	1.25	
144	183	2.5	
104	122	2	5cm stump
251	254	7	
215	303	4	
183	286	3	

3 meters 27 cm in height. Plant width is generally larger than the plant height with only 16 plants being taller than wide. No seedlings were found.

In Wallace's 1974 collection deposited at UC Berkeley, he noted plants were up to 2 meters wide, 1.5 meter in height, and basal stems were 5 or 6 cm diameter. He reported several isolated shrubs in the area at an elevation around 100 feet. *Ornithostaphylos* was stump sprouted in some of the slope areas not far from Dairy Mart Road. Stump diameter in one area was approximately 6 cm with resprouts being of 1 to 1.5 cm diameter. Gary Wallace currently works at Rancho Santa Ana Botanic Gardens and recalls he collected the specimens from a slope area along a dirt road off Monument Road 0.5 miles west from the junction with Dairy Mart Road, not the mesa top where Moran's collection was made or where most local botanists describe the location for the species (O'Brien, personal communication).

4. Life History

Ornithostaphylos oppositifolia (C.Parry) Small is a rigidly branched, burled, erect shrub in the Ericaceae. Plants on the mesa are under generally under 2 meters in height although the species is reported to be capable of attaining up to a 5 meter height. The species tends to be multistemmed and has a lignotuber. It is capable of resprouting from the trunk after a fire. It has a reddish-brown bark that peels in thin sheets to expose white or gray-green stems. It has persistent glabrous to hairy leaves with shiny green upper surfaces and pale green lower surfaces. Leaves are narrow, linear, numerous, opposite and whorled, 2.5 to 8 cm in length and 3 to 6 mm wide. The leaves are leathery, evergreen, short-petioled, and the margins rolled under. The inflorescence is a bracted drooping panicle with many flowers. There are two bractlets. The plant has 4 or 5 +/- 1/2 fused persistent sepals, mostly 5, with 4 or 5 +/- 2/3 fused petals, mostly 5. Flowers are white to greenish-white and spheric to urn shaped (globular-ureolate) approximately 4 mm long by 3 mm wide. There are generally 10 stamens and anthers are dehiscent by separate gaping awned slits. The filaments are unappendaged and pubescent. The ovary is superior, depressed and seated on a thick disk and has 5 chambers. The placentas are axile. The fruit is a dry drupe with 5 stones fused into a unit with a thin pulp. The small red drupes are generally present May to August. Seeds are generally 10. The plant blooms January to April. The fruit is reported to be attractive to birds. The species description was derived from Hickman (1993), Munz (1974), Moran (1973), Wallace (1974 herbarium specimen notes), and the Native Son website (1999).

In Wallace's 1974 collection deposited at UC Berkeley, he noted the species was multistemmed erect shrubs; with lignotuber; plants to 2 meter wide, 1.5 meter high; basal stems to 5 or 6 cm diameter; leaves to 5 cm long. He reported associates as being *Xylococcus bicolor*, *Adenostoma fasciculatum*, *Marah*, *Malosma laurina*, *Heteromeles arbutifolia*, and *Cneoridium dumosum*. He reported several isolated shrubs in the area at an elevation around 100 feet.

The Jepson Manual reports the species as growing in chaparral at 100 to 800 meters in San Diego County and northern Baja California, Mexico (Hickman, 1993). Beauchamp

Flowering shrub with visible branching

Multi-branching

reported the elevation for the U.S. population as 125 meters (Beauchamp, 1986) and Reiser notes the species growing in coastal chaparral as it is found within 3 miles of the ocean (Reiser, 1994). Baja California Birdbush grows in association with *Xylococcus bicolor*, *Ceanothus verrucosus*, and *Adenostoma fasciculatum*. Shrub cover on the mesa was reported as being relatively dense by Reiser but is currently fairly open as the area is subject to much human usage and the shrubs are used to shield people from view. Some of the shrubs are currently located on densely covered slopes although there is evidence of trails throughout most areas even in the dense areas where the trails lead around and under the plants where there is a plethora of clothes and plastic drinking bottles.

Ornithostaphylos plants tend to be widely separated on the mesa growing in full sun and the term sparse distribution comes to mind. In Moran's original communication on the US population, he reported the habitat as being chaparral-with-sage-scrub. He stated common shrubby associates were *Ceanothus verrucosus* and *Salvia mellifera*. Also reported as present were *Yucca schidigera*, *Eriogonum fasciculatum*, *Adenostoma fasciculatum* var *obtusifolium*, *Cneoridium dumosa*, *Rhus integrifolia*, *Rhus laurina*, and *Artemisia californica*. Current habitat has been described as Southern mixed chaparral and Maritime chaparral although the term chaparral-with-sage scrub seems most descriptive. In most areas, the most common associate was *Salvia mellifera* followed by *Ceanothus verrucosus*, then *Cneoridium dumosa*. Although Wallace reported toyon as being an associate, toyon is currently rare in the area and there is evidence of fire in many of the areas. *Malocothamnus fasciculatus* is abundant and dominant on some parts of the slopes and mesa top. Old charred stumps from plants were seen in some of the slope areas during the 1999 surveys and the *Ornithostaphylos* was stump sprouted in those areas. Stump diameter in one area was approximately 6 cm with resprouts being of 1 to 1.5 cm diameter. *Malosma laurina* height in this same area was only 1.8 meters tall. Wallace remembers collecting the species on slopes, not mesa top, and since he reported basal stems at 5-6 cm, this may be the same area post-burn.

Reiser reports the soil on the suppporting mesa to be Olivenhain cobbly loam. Wallace, who collected the species in 1974, reported the soil to be rocky humus rich soil.

Dr. George Diggs at the University of Texas and the Botanical Research Institute of Texas collected from the United States population in 1987 for study on the relationships of *Ornithostaphylos oppositifolia* and related genera (*Arctostaphylos*, *Comarostaphylis*, and *Xylococcus*) for the *Flora of North America*. Material was collected from a number of individuals for a DNA analysis. *Ornithostaphylos* is a monotypic genus in the United States. Loss of *Ornithostaphylos oppositifolia* will reduce the United States flora by a genus as well as a species. Gary Wallace prepared the treatment of the species for *The Jepson Manual* (Wallace, personal communication). The species was known as *Arctostaphylos oppositifolia* at one point in time (Roberts, personal communication and Munz, 1974).

The plant is in propagation at the Rancho Santa Ana Botanic Gardens, Buena Vista Nursery, and Native Son Nursery. It is a slow growing species and Bart O'Brien at the

Urn-shaped flowers

Evidence of old burn

General Habitat – *Ornithostaphylos oppositifolia* in both pictures

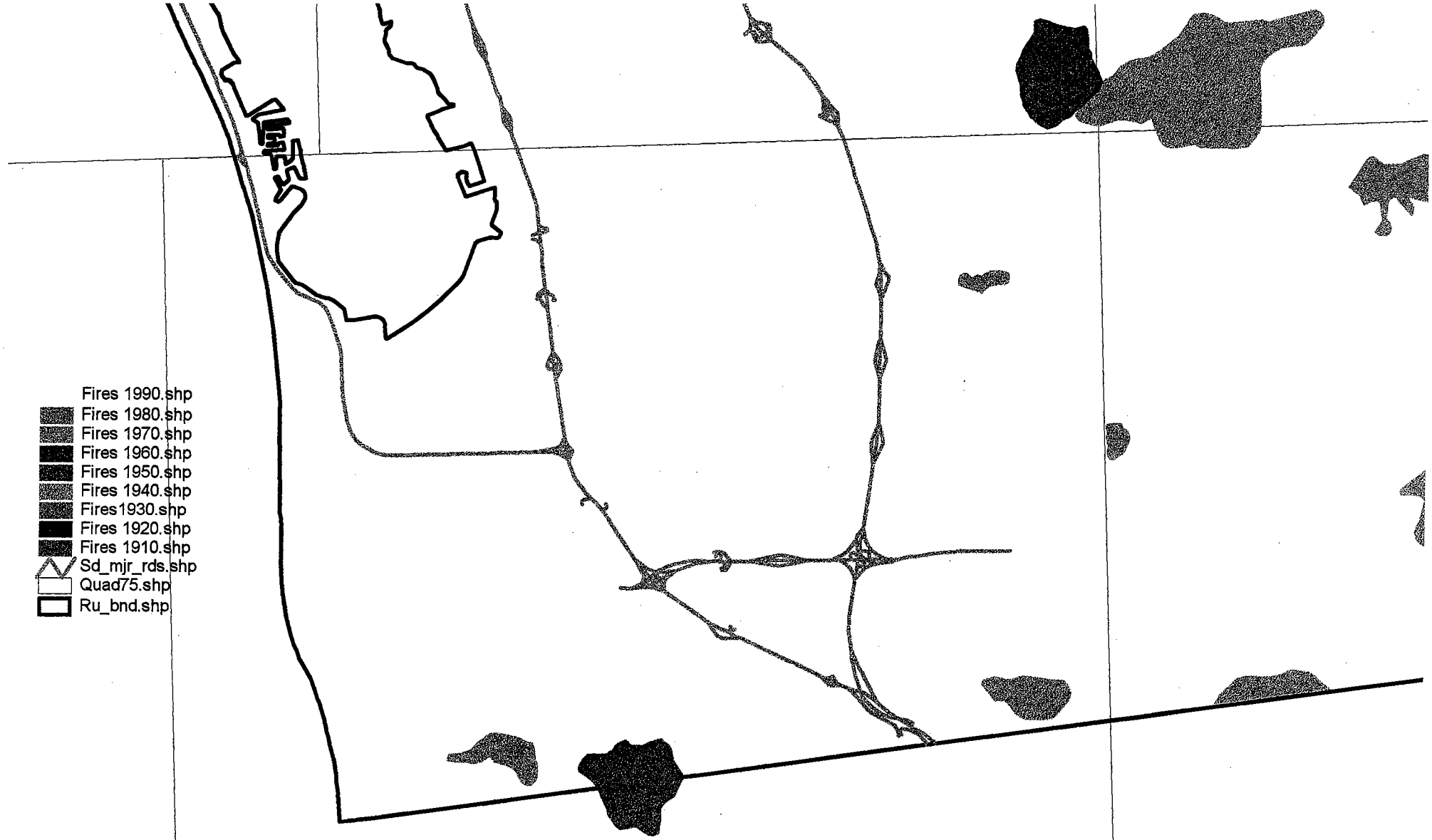
Rancho Santa Ana Botanic Gardens believes the species to be long lived with low reproduction. Bart O'Brien has collected twice from the United States population and propagation from cuttings were unsuccessful although that is the common method for propagating *Arctostaphylos* species. He found seed set to be low although seeds were viable. Plants at Rancho Santa Ana Botanic Gardens have grown to at least 4 meters in height. Few seeds could be located on plants in 1998 surveys in the summer. Prolific flowering was seen on some of the shrubs in 1999 although most plants had few blossoms during the early March surveys and prolific flowering during the later March surveys. Honey bees were seen regularly on the blooming plants. Flower size is so small that it is unlikely that most species could not access the nectar (Wallace, personal communication).

Native Son Nursery reports the species grows in full sun with well-drained soil (Native Son website, 1999). It is drought tolerant but its appearance is improved with summer water. It is said to be hardy to 20°F. It has been grown in a garden setting in Alpine, California (Hohimer, personal communication)- under a much more varied climatic regime than it encounters in its coastal location in the United States but its Baja California distribution to the foothills of the San Pedro Matir suggests the species is capable of growing in colder regimes.

Arctostaphylos species generally require mycorhizal associates (O'Brien, personal communication) and it is unknown if *Ornithostaphylos* has the same association. An *Arctostaphylos* species, perhaps *Arctostaphylos glandulosa* ssp. *zacaensis* (Eliason, personal communication), also grows on the slopes of Spooner's Mesa. Given the height of plants in nurseries and in Baja California and the density of plants in Baja California populations, some factor seems to be limiting the growth and and reproduction of the species in its sole United States location. *Arctostaphylos* is known to have both seed coat dormancy and embryo dormancy (Dehart, 1994). In nature, over-wintering and some sort of scarification would break both dormancies. Scarification is frequently accomplished by the digestive tract of a coyote but the level of human activity in the area may impact the number of animals available. Deer track and some coyote scat was seen during one visit but the area is not rich in animal sign except for rabbits.

R.E. Fulton and F.L. Carpenter conducted a study on two species of manzanita near Riverside, California (Fulton and Carpenter, 1979). One species recolonized an area by seed after a burn while the other species resprouted from root burls. The seeding species produced more flowers, more nectar, had twice the number of insect visitors than the resprouter, and was self-compatible. The resprouter was not self-compatible. *Ornithostaphylos oppositifolia* is a resprouter after fires but it is unknown if the species is self-compatible. The California Department of Forestry's Fire and Resource Assessment Program conducted by the Pre-Fire Section has records for a fire stratling the border towards the eastern end of the distribution in the 1950s and a separate isolated fire on the western portion of the range in the 1980s (Lyle, personal communication).

Keeley found the number of flowers and consequent fruits produced each year by *Arctostaphylos* to vary considerably (Keeley, 1977). He studied the possible causes of the



This map compiled using ArcView 3.1
Data furnished by CDF's Fire and Resource Assessment Program
Information contained herein is deemed correct
but not guaranteed.
Randy Lyle, Fire Captain Specialist

variation and found that it was tied to the amount of precipitation which occurred during the previous year. More moisture resulted in the formation of a greater number of flower buds in the late spring. Again, it is unknown if a similar variation is occurring in *Ornithostaphylos*.

As stated previously, a great deal of stump sprouting was evident. Numerous branches would resprout from the burl. In plants with larger diameter branches, there were fewer branches with 1-5 branches being common in the larger shrubs whereas the smaller shrubs typically had 10-15 branches. Some plants with multiple large branches displayed evidence of partial death of a branch. One shrub in particular had 2 large dead branches and 2 branches where 3/4 of the branch appeared dead.

5. Kind of Habitat Necessary for Survival

Historically the coastal mesa supporting the species was largely undisturbed *Ceanothus verrucosus/Salvia mellifera* dominated habitat (Moran, 1973). Few dirt roads accessed the mesa. Presumably the species does not tolerate grading, being driven over, or hacked with a machete. *Ornithostaphylos oppositifolia* appears to grow in maritime chaparral or in chaparral with a large component of coastal sage scrub species. The plant is found growing in full sun and plants that are adjacent to another plant tend to be smaller in size. It is unknown what restricts the occurrence of this species as it has only ever been reported in one area in San Diego. It is likely that too frequent fire impacts the species negatively (Oberbauer, personal communication). Tom Oberbauer believes the species may need 30-40 years between fires based on his observation of Baja California populations.

6. Factors Affecting Ability to Survive and Reproduce

Destruction of habitat is the main threat to the species in the United States. Dirt roads have proliferated with Operation Gatekeeper and plastic water containers, clothing, blankets, and trails are readily visible in the shrub covered areas closest to the border. Evidence of branch breakage was visible during a January 1999 visit to the site as more bare earth associated with Border Patrol activity is resulting in increased usage of the remaining shrublands for cover. Trail networks exist on all of the mesas and slopes and many times run under the shrubs. Habitat for the species is being lost to road proliferation and brush clearance for ease in scanning of the border area by U.S. Border Patrol on Spooner's Mesa. Over the past 5 years, the mesa supporting the species has become more fragmented due to additional roads being created on the mesa. The rate of loss of intact habitat on the mesa appears to be accelerating over the last year. Aerial photographs from 1928, 1953, 1983, and 1999 show the road proliferation that has occurred on the mesa. The mesa can be tracked in the aerials by orienting on Hollister Street and the curves on Monument Road. The 1928 aerial shows little human impact to the mesa. The 1953 aerial shows some roads on the mesa. The 1983 aerial shows the mining operation as well as the proliferation of roads on the mesa. It is unknown if the mining operation impacted the species. The 1999 aerial demonstrates the widening and proliferation of roads above the

Plants impacted by road on edge of mesa

Ornithostaphylos oppositifolia adjacent to *Ceanothus verrucosus*

1983 level of impact. One can generally encounter at least three Border Patrol vehicles while visiting the small site.

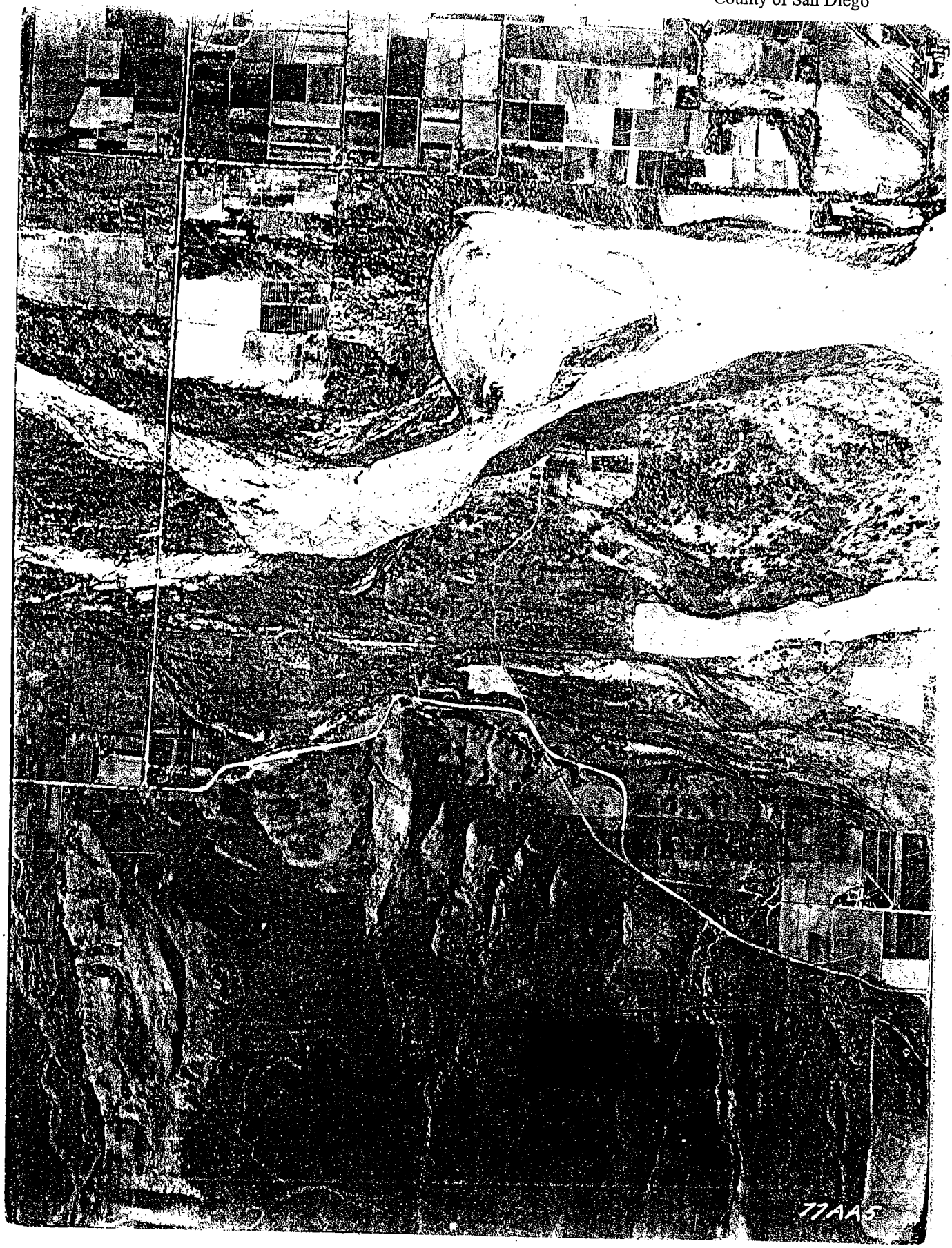
Fire is a potential threat in the area.

7. Degree and Immediacy of Threat
The United States Border Patrol has proposed to build a new fence and road system along the border and at one time had plans to complete a project on the 14 westernmost miles of the border in the fall of 1998 (Gustaitis, 1998). Their proposal was to fill in the canyon (Smuggler's Gulch) adjacent to the mesa that supports the Birdbush to create a flat platform for roads, sensors, cameras, and other detection devices associated with controlling the border. They would use the top of Spooner's mesa to fill the large drainage eliminating the sole population of Baja California Birdbush. United States Fish and Wildlife personnel requested surveying for a listed endangered butterfly, the Quino Checkerspot, and the border project has been delayed until data can be collected for the checkerspot this spring. An Environmental Assessment for a project is "in the works". Documentation for projects associated with Border Patrol projects, such as road work on Otay Mountain and fence construction in Spring Canyon, tend to ignore impacts to non-listed rare species and it is possible that all naturally occurring plants of the species would be extirpated from the United States.
Additional brush clearance is currently being proposed for Spooner's Mesa to enable better visual access to the border for US Border Patrol Agents (Elvin, personal communication). This will further impact habitat for the species and bring more cleared area within yards of plants.

8. Impact of Existing Management Efforts
The County of San Diego acquired Spooner's Mesa in 1998 as an addition to the Tijuana River Valley Regional Park. The area is part of the Multiple Species Conservation Program (MSCP) preserve but the species was not evaluated for coverage with the plan and "MSCP is not intended to constrain activities of the Border Patrol" (Section 6.2.6, MHPA Guidelines, Preserve Management, and Reporting in Volume I and II Revisions of the MSCP Plan). It is not clear that there are any management plans for the species although MSCP was intended to eliminate the need for future listings of species by providing adequate habitat conservation (MSCP, 1996).

An Environmental Assessment (EA) is expected to be completed late spring or early summer for the fencing-platform INS project. In general, INS EAs have ignored non-listed rare plant species in their San Diego projects (fencing in Spring Canyon and road work for Otay Mountain) and unless another public agency is responsible for the land such as BLM on Otay Mountain, the impact to a rare species is ignored and a FONSI immediately produced. INS projects are sometimes conducted without notification of available documents to interested parties (California Native Plant Society) even when notification has been requested for all projects in the county such as was done with the Spring Canyon EA and the Brown Field EA.

1928 Aerial Photography
County of San Diego



Multiple Species Conservation Program Preserve Lands

9. Suggestions for Future Management

To ensure the future survival of the species, the filling of Smuggler's Gulch with Spooner's Mesa must be avoided. An alternative method for control of illegal entry into the United States in needed, such as tall towers and sensors in combination with moving the interception point to Monument Road. Redundant roads should be rehabilitated on the mesa. Border Patrol agents should be educated about the rarity of the species and taught to identify it by sight in order to minimize their impacts to the species.

The County should develop a management plan for the species as well as the abundant number of other sensitive plant species that occur on Spooner's Mesa. Sensitive plant species encountered during 1999 surveys included: *Ceanothus verrucosus* (Warty-stemmed ceanothus), *Coreopsis maritima* (Sea dahlia), *Bergerocactus emoryi* (Goldenspined cereus), *Euphorbia misera* (Cliff spurge), *Opuntia parryi* var. *serpentina* (Snake cholla), *Ferocactus viridescens* (Barrel cactus), and *Selaginella cinerascens* (Ashy spike moss). The sole mainland U.S. population of *Ribes viburnifolium* (Santa Catalina Island currant) is reported from a drainage on the same mesa (Hannon, personal communication). *Camissonia lewisii* (Lewis' evening primrose) has been reported from the site in the past (Reiser, 1994). All of these species would benefit from better management of the area. Management of resources is expected in Multiple Species Conservation Program preserve lands such as this area.

It is unusual to find *Ceanothus verrucosus* in the southern part of the county although it is abundant on the mesa and slopes that support *Ornithostaphylos oppositifolia*. It would be interesting to understand the plant association on Spooner's Mesa. There are few remaining coastal mesas with somewhat native habitat in the southern part of the county. More information should be developed on the biology of *Ornithostaphylos oppositifolia* including pollination and self-compatibility studies. Soil flora should be examined for the species.

Individuals Consulted:
Please note that consultation was for informational purposes only. Inclusion on this list does not imply that individuals, agencies, or companies listed are in support of this petition.

Mitch Beauchamp
Pacific Southwest Biological
P.O. Box 985
National City, CA 92050
(619) 477-5333

Jim Dice
California Department of Fish & Game
P.O. Box 2537
Borrego Springs, CA 92004
(619) 767-3384

Dr. George Diggs
Austin College
Suite 61564
900 North Grand Avenue
Sherman, Texas 75090-4440
(903) 813-2000

Rod Dossey
4103 La Portalada
Carlsbad, CA 92008
(619) 640-0593

Dr. Barbara Ertter
UC Berkeley
1001 Life Sciences Building, #2465
Berkeley, CA 94720-2465

Dylan Hannon
Rancho Santa Ana Botanic Gardens
1500 North College Ave
Claremont, CA 91711-3157
(909) 625-8767

Don Hohimer
3122 Victoria Drive
Alpine, CA 91901
(619) 445-3116

Randy Lyle
CA Department of Forestry
Fire and Resource Assessment Program
Pre-Fire Section
(619) 588-0364

Bart O'Brien
Rancho Santa Ana Botanic Garden
Curator of Living Collection
1500 North College Avenue
Claremont, CA 91711-3157
(909) 625-8767 Ext 238

Craig Reiser
Merkel & Associates
4455 Murphy Canyon Road
San Diego, CA 92123
(619) 560-5465

Tom Oberbauer
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666
(619) 232-3821

United States Fish & Wildlife Service
Carlsbad Office
2730 Loker Avenue West
Carlsbad, CA 92008
(760) 431-9440

Mark Elvin
Fred Roberts
Julie Vanderwier
Gary Wallace

Vince Scheidt
3158 Occidental Street
San Diego, CA 92122
(619) 457-3873

REFERENCES

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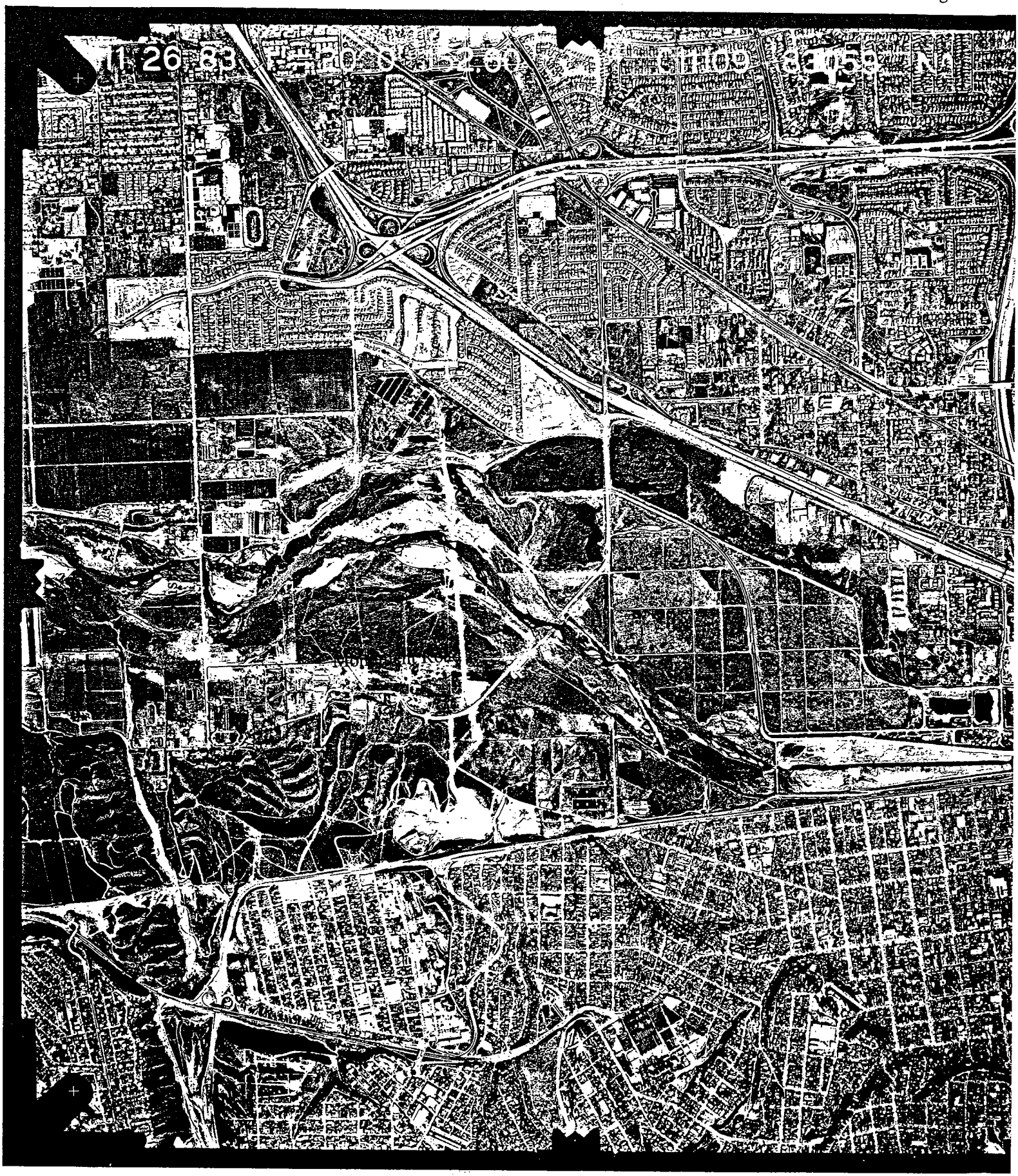
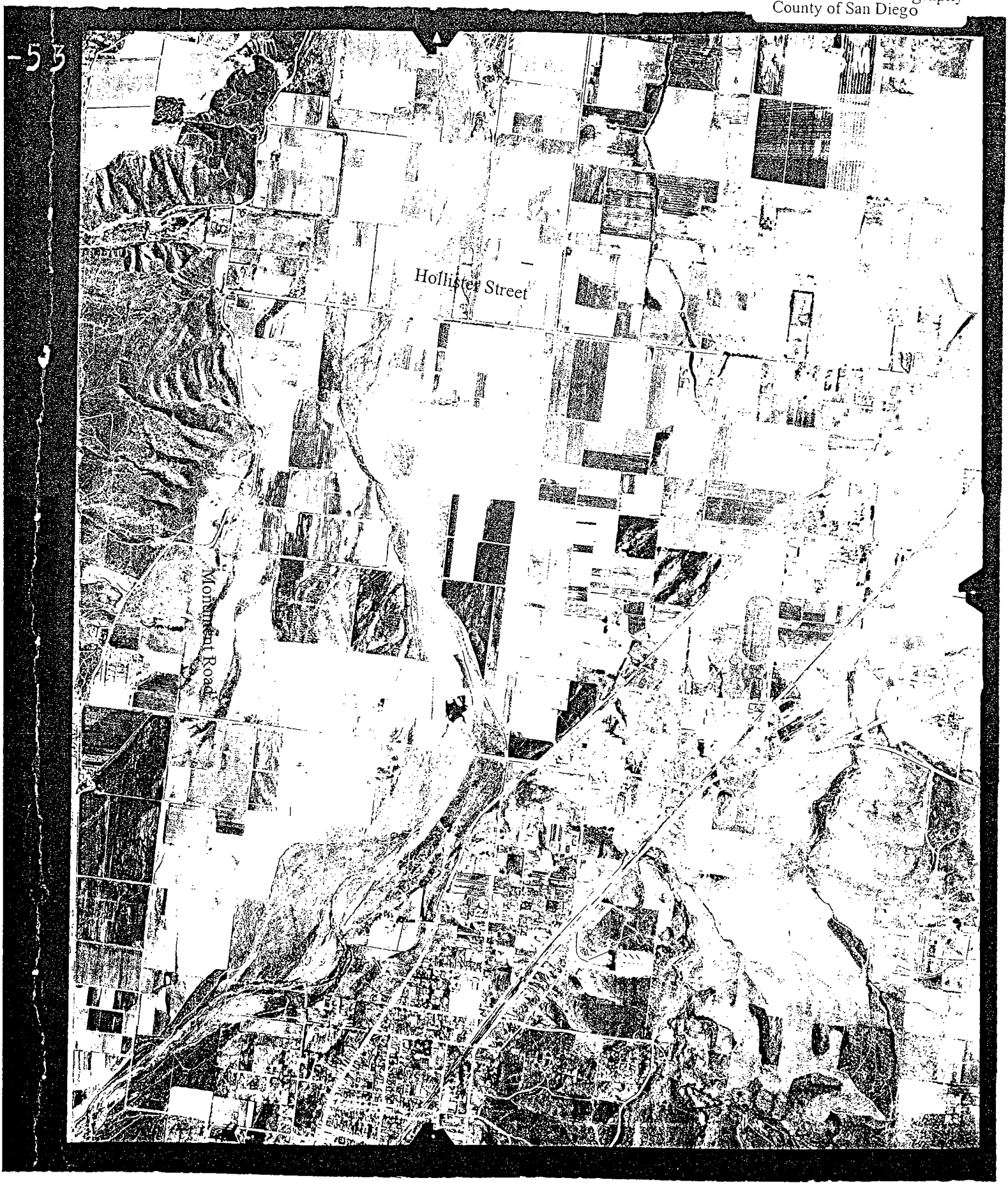
1983 Aerial Photgraphy
County of San Diego



1953 Aerial Photography
County of San Diego

-53



November 3, 2004

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Maeve Hanley, M.S.
Environmental Resource Manager
Department of Parks and Recreation
5201 Ruffin Road, Suite P (MS029)
San Diego, CA 92123
Ph: (858) 694-2968
Fx: (858) 495-5841
Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT

Comment Form

Name Victoria M. Doci
Address 3439 Willow St. Bonita CA 91902

Email Spoiled110687@SBCglobal.net
Organization Bonita Valley Horsemen
phone (619) 4755233

Most importantly, please keep all of the narrow horse trails that TRVEA has on their maps (MOU Officially Sanctioned trails) including Wycliff, Sherwood, Cathedral, Brian's Bridle, Beach Trail, South Berm and PERL Rd. These are beautiful trails that should be preserved!
Make sure we still have access to ride to the beach and on the beach.

Dedicate at least 5 acres for a RENTAL STABLE for the public. Lease it for 20 years for a nominal fee. Guarantee horse trail connections to all horse-related business and farms and the mesas, beach, horse trails, and multi-purpose trail.

Where are the TRAIL ENHANCEMENT parts of the project???

Keep what is already there for the horses and enhance by adding at least one 2-acre community arena with the same kind of amenities you added for the great ball fields! Build bleachers and a 2 story announcing booth like Sweetwater has so that we can have horse shows and educational opportunities for the horse people and the community. Include several washstands, porta-potties, horse-trailer parking, regulation size arena, facilities for team-penning, water troughs, picnic tables, BBQ's and 20 corrals.

An idea to raise revenue would be to add overnight horse camping with water and bathrooms and at least 12 corrals. This would bring people from all over the state! Place this at the Staging Areas.

Add a Mounted Assistant Unit to regularly patrol all of the Regional Park, State & Federal parts of the park on horseback.
Add markers along the trails for reference.
Sincerely,

Victoria M Doci

November 3, 2004

2004 NOV 5 AM 8 25

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Environmental Resource Manager
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Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT Comment Form

Email andreagoyette@cox.net
Name Andrea Goyette **Organization Bonita Valley Horsemen**
Address 3305 Kennelworth Lane **phone 619-475-3500**
Bonita, CA 91902

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Sincerely,

Andrea Goyette

2004 NOV 5 AM 8 25

November 3, 2004

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Department of Parks and Recreation
5201 Ruffin Road, Suite P (MS029)
San Diego, CA 92123
Ph: (858) 694-2968
Fx: (858) 495-5841
Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT

Comment Form

Name Cindy Hartermann **Email**
Address 19250 TAYLAKES RD #149 CHULA VISTA, 91913 **Organization** Bonita Valley Horsemen **phone**

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Sincerely, Cindy Hartermann - Bonita Valley Horsemen

November 3, 2004 2004 NOV 5 AM 8 24

Maeve Hanley, M.S.
Environmental Resource Manager
Department of Parks and Recreation
5201 Ruffin Road, Suite P (MS029)
San Diego, CA 92123
Ph: (858) 694-2968
Fx: (858) 495-5841
Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT Comment Form

Name William Hancock Email none
Address 3439 Willow St. Organization Bonita Valley Horsemen
Bonita CA 91902 phone (619) 475-5233

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Sincerely,
William C. Hancock

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November 3, 2004

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San Diego, CA 92123
Ph: (858) 694-2968
Fx: (858) 495-5841
Maeve.hanley@sdcounty.ca.gov

TIJUANA RIVER VALLEY REGIONAL PARK TRAILS AND HABITAT ENHANCEMENT PROJECT Comment Form

Name Christine Halgat
Address 3439 Willow St
Bonita CA 91902

Email none
Organization Bonita Valley Horsemen
phone (619) 475-5233

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Sincerely, Christine M. Halgat

Tijuana River Valley Regional Park
Trails and Habitat Enhancement Project
Clearing house #2004091159
by November 4, 2004

Comment

November 1, 2004

Bobby Hicks
1931 Leon Avenue
San Diego, CA 92154
619-572-8499
BobbyH7828@aol.com

R/E: TJRVRP Trails Plan Project Comments:

I write this letter with great concerns in regards to the trails that I have personally walked and ridden horses on for many, many years. The public is now being told that these trails are considered to be non-permitted use according to the California Environmental Quality Act in the Tijuana River Valley Regional Park (TRVRP). I am offended that our trials are considered to be haphazard and unplanned development that has caused habitat degradation and deterioration.

The wildlife has flourished and adapted along side the so called haphazard trials that horses and people pass through quietly. These trails are the paths taken by Illegal Migrants, used by the Boarder Patrol for tracking and enjoyed by the public (Bird watchers included). If you make these trails illegal, they will continue to be used by the Illegal Migrants and the Boarder Patrol. Planting over the trails will only cause the Migrants to forge new trails, thus disturbing the very animals your out to protect. The percentage of trails, currently use a small percentage of the valley available for all to share.

Your new Yellow Brick Road Trail is your attempt to remove/route the public around the valley. It creates a point to point destination. The multi-use trail will be dangerous and a great liability for the public as well as the city in regards to injuries and law suits. This trail will not allow for the enjoyment of the valley by taking away the pristine rural qualities of the existing Memo of Understanding Trails. The existing trails allow the public to enjoy nature at its best. These trails allow you to enjoy different areas of the valley and the amount time you have/want to spend. The purposed trail only allows for the same stay out of the valley experience.

These shared trails have existed for many years, and I consider them to be a permanent easement. I also understand that these trails may have to be mitigated in order to exist. Why should anyone have to mitigate trails that have existed many years prior to your interest in the valley? Your proposed project to supersede the Memo of Understanding of 1997 is flat out misuse of laws passed by the people to preserve the environment.

You're reasoning for trying to take away public use of park land, by sighting rehabilitation to its natural habitat. In the past the Valley did not have the vegetation that now flourishes with the current watershed/sewage that flows from Tijuana. You have fertilizer flowing from Tijuana that encourages all this new growth. Now you want to push out the past and current usage of the valley by claiming habitat degradation, deterioration, while in fact the wildlife and vegetation has flourished under these conditions. Although, if the government had been able to control water flow/sewage issues south of the boarder, you would see the valley convert to its actual natural habitat.

I do welcome Habitat Enhancement along with current Multi-use trails and agriculture, not the elimination of trails and agriculture. The TJRVRP should be looking at the addition of planned trails on land as they expand planting enhancement in the valley. This does not mean the addition of minor trails to try to appease the public while you take away the trails that we have a right to enjoy and use. I'm happy that the valley will be preserved for the future, but it should not be taken away from the public to enjoy. Your plans for habitat and wildlife can co-exist if the county/government agencies are willing to share the open space for all to enjoy and flourish.

Habitat, Wildlife, Public = Happy Co-Existence.

Sincerely,

Bobby Hicks

Bobby Hicks
1931 Leon Avenue
San Diego, CA 92154

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SAN DIEGO CA 921
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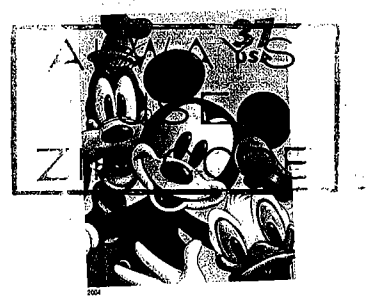

Ms. Maeve Hanley
San Diego Department of Parks & Rec.
5201 Ruffin Road, Suite P
San Diego, CA 92123

92123+4310

BOB FILNER
51ST DISTRICT, CALIFORNIA

2428 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
TEL: (202) 225-8045
FAX: (202) 225-9073

333 F STREET, SUITE A
CHULA VISTA, CALIFORNIA 91910
TEL: (619) 422-5963
FAX: (619) 422-7290

1101 AIRPORT ROAD, SUITE D
IMPERIAL, CALIFORNIA 92251
TEL: (760) 355-8800
FAX: (760) 355-8802

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website: www.house.gov/filner

November 2, 2004

Maeve Hanley
San Diego Department
Of Parks & Recreation
5201 Ruffin Road, Suite P
San Diego, CA 92123

Dear Maeve:

It has recently come to my attention that there are several concerns regarding the County of San Diego's proposed trails and habitat enhancement project in the Tijuana River Valley Regional Park.

Many of my constituents are concerned that you are proposing to eliminate almost 80 percent of the valley's equestrian trails and have a single 14.7mile multi-use trail.

The Environmental Impact Report (EIR) for this project needs to include the fact that this is one of the last equestrian areas in the County of San Diego and that hikers, cyclists and bird watchers have many other areas to enjoy their activities.

I ask that you keep me updated as this process continues and that you do everything in your power to ensure that the resident's views and opinions are taken into consideration.

Please feel free to contact me or Mario C. López from my staff at (619) 422-5963 if you have any concerns or to keep me updated.

Sincerely,

BOB FILNER
Member of Congress

BF/ml
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