

APPENDIX C – RESPONSE TO COMMENTS

COMMENTS RECEIVED ON THE DRAFT IS/MND AND RESPONSES

All comments received on the Draft IS/MND have been coded to facilitate identification and tracking. The City received 25 comment letters on the Draft IS/MND during the public review period that began on April 3, 2017 and closed on May 5, 2017, including four comment letters received after the public review closure date, one each on May 8, May 9, June 30, and July 7. The comment letters on the Draft IS/MND are listed in Table 1 below. Each of the comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Where a letter comments on more than one issue, each individual comment issue is numbered (A-1, for example) and a specific response is included for each issue.

Table 1 Comment Letters Received on the Draft IS/MND

Letter	Commenter	Date
A	Scott Morgan, Director, State Clearinghouse and Planning Unit	May 3, 2017
B	Jacob Armstrong, Chief, Development Review Branch, California Department of Transportation District 11	April 26, 2017
C	Karen A. Goebel, Assistant Field Supervisor, U.S. Fish and Wildlife Service, and Gail K. Sevrens, Environmental Program Manager, California, California Department of Fish and Wildlife	May 5, 2017
D	Erin Prahler, Coastal Program Analyst, California Coastal Commission	May 5, 2017
E	Christopher P. Terzich, Environmental Technology and Regulatory Lead, San Diego Gas & Electric	May 5, 2017
F	De’Ann Weimer, President, Citizens for North County	May 5, 2017
G	Diane Nygaard, President, Preserve Calavera	May 4, 2017
H	Lee Leibenson, Senior Community Association Manager, San Pacifico Community Association	April 10, 2017
I	Shasta C. Gaughen, Tribal Historic Preservation Officer, Pala Band of Mission Indians	April 20, 2017
J	James W. Royle Jr., Chairperson, Environmental Review Committee, San Diego County Archaeological Society, Inc.	May 3, 2017
K	Destiny Colocho, Rincon Band of Luiseño Indians	June 30, 2017
L	Merri Lopez-Keifer, San Luis Rey Band of Mission Indians	July 7, 2017
M	Mike Howes	May 9, 2017
N	Amanda Mascia	May 5, 2017
O	Robert Steuernagel	April 7, 2017
P	Vickey Syage	May 3, 2017
Q	Kristine Wright	May 5, 2017
R	Janell Cannon	May 4, 2017
S	Ronee Kozlowski Nicholson	May 5, 2017
T	Hope Nelson	May 5, 2017
U	Rich Breyer	May 5, 2017
V	Michelle Breyer	May 4, 2017
W	Harry Peacock	May 4, 2017

Table 1 Comment Letters Received on the Draft IS/MND

Letter	Commenter	Date
X	Jan Bandich	May 3, 2017
Y	Kasey Cinciarelli	May 4, 2017
Z	Jodi Good	May 8, 2017



EDMUND G. BROWN JR.
GOVERNOR May 3, 2017

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

City of Carlsbad

MAY 05 2017

Planning Division

Pam Drew
City of Carlsbad
1635 Faraday Ave
Carlsbad, CA 92008-7314

Subject: City of Carlsbad Trails Master Plan
SCH#: 2017041006

Dear Pam Drew:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 2, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017041006
Project Title City of Carlsbad Trails Master Plan
Lead Agency Carlsbad, City of

Type MND Mitigated Negative Declaration
Description The Trails Master Plan is a planning document proposed for use as a comprehensive reference for the future development and maintenance of the city's trail system. The plan implements the community's vision to have a fully connected trail system to provide more opportunities for active living and to create new, non-vehicular connections to destination through appropriate standards and design guidelines. The Trails Master Plan includes 42 new trail segments to be developed by the city, private applicant, or other public agency that would expand the existing trails network by an additional 38 miles. The project includes a GPA to incorporate the trails master plan by reference.

Lead Agency Contact

Name Pam Drew
Agency City of Carlsbad
Phone (760) 602-4644 **Fax**
email
Address 1635 Faraday Ave
City Carlsbad **State** CA **Zip** 92008-7314

Project Location

County San Diego
City Oceanside, San Marcos, Vista, Encinitas
Region
Lat / Long
Cross Streets Citywide
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 5, 78
Airports McClellan-Palomar Airport
Railways NCTD/BNSF/Amtrak
Waterways Pacific Ocean, Aqua Hedionda Creek & Lagoon, Batigue
Schools Carlsbad & San Marcos
Land Use The proposed trails will be constructed in areas with GP and Z of open space

Project Issues Agricultural Land; Archaeologic-Historic; Biological Resources; Coastal Zone; Geologic/Seismic; Recreation/Parks; Soil Erosion/Compaction/Grading; Wetland/Riparian; Vegetation; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Caltrans, District 11; Native American Heritage Commission; State Lands Commission; Regional Water Quality Control Board, Region 9

Date Received 04/03/2017 **Start of Review** 04/03/2017 **End of Review** 05/02/2017

Note: Blank in date fields result from insufficient information.

clear
5/2/17

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Thursday, April 27, 2017 8:27 AM
To: Dodson, Kimberly@DOT
Cc: Armstrong, Jacob M@DOT; Scott Morgan; OPR State Clearinghouse; Kasia Trojanowska
Subject: RE: I-5 - City of Carlsbad Trails Master Plan Notice of Preparation SCH#2017041006

Good morning Kimberly,

Thank you for your comment letter. We will adjust segment 12C and show it on the west side of I-5. We will also work with CalTrans when trail segments 1B and 1C are in the planning stages to make sure there is no conflict with your future widening of SR78.

Thank you,

From: Dodson, Kimberly@DOT [<mailto:kimberly.dodson@dot.ca.gov>]
Sent: Thursday, April 27, 2017 7:54 AM
To: Pam Drew <Pam.Drew@carlsbadca.gov>
Cc: Armstrong, Jacob M@DOT <jacob.armstrong@dot.ca.gov>; Scott Morgan <Scott.Morgan@OPR.CA.GOV>; State.Clearinghouse@opr.ca.gov
Subject: I-5 - City of Carlsbad Trails Master Plan Notice of Preparation SCH#2017041006

Greetings:

Please see the attached comment letter for the City of Carlsbad Trails Master Plan Notice of Preparation SCH#2017041006. A hardcopy will mailed.

Regards,

KIMBERLY D. DODSON, GISP
Caltrans District 11 Planning | Associate Transportation Planner
4060 Taylor St., MS-240 | San Diego, CA 92110 | 619-688-2510
kimberly.dodson@dot.ca.gov | <http://www.dot.ca.gov/d11/index.html>

Governor's Office of Planning & Research
APR 27 2017
STATE CLEARINGHOUSE

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

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E

April 26, 2017 Governor's Office of Planning & Research

APR 27 2017

STATE CLEARINGHOUSE

11-SD-5, 78

PM VAR

City of Carlsbad Trails Master Plan

SCH#2017041006

Ms. Pam Drew
Associate Planner
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008-7314

Dear Ms. Drew:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation for Draft Environmental Impact Report (EIR) for the proposed City of Carlsbad Trails Master Plan located near I-5 and SR-78. The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Figure 5 Proposed Trail Segments map shows the trail 12c as proposed on the eastern side of I-5, instead it should be shown on the west side of I-5. Please see the attachment.

Although there are no apparent conflicts with this trail plan in regards to Caltrans right of way in the current existing condition, there are two future major corridor projects proposed along SR-78: the I-5/SR-78 Connector project and the SR-78 Managed Lanes project. Both of these projects are currently in the final stages of completing the Project Initiation Document phase.

The two trails of particular concern are existing pathways the Haymar Road Trail that are listed as "Improvement Projects in the table on page 5-9 and are labeled as 1B and 1C in Figure 5, "Proposed Trail Segments."

Within the City of Carlsbad limits from I-5 to east of College Boulevard, the two future roadway projects will widen SR-78 in both directions to accommodate a new connector system at the juncture of I-5 and SR-78 and to add two managed lanes and other operational improvements along SR-78 from I-5 to I-15. Therefore, there may be

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Ms.Drew
April 26, 2017
Page 2

potential impacts to trails 1B and 1C since the trails are adjacent to the Caltrans right of way.

As the planning and/or design of these Haymar Road trails is further developed, we would appreciate the opportunity to review future documentation and to work with the City of Carlsbad to minimize potential conflicts between the future trail and SR-78 roadway projects.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

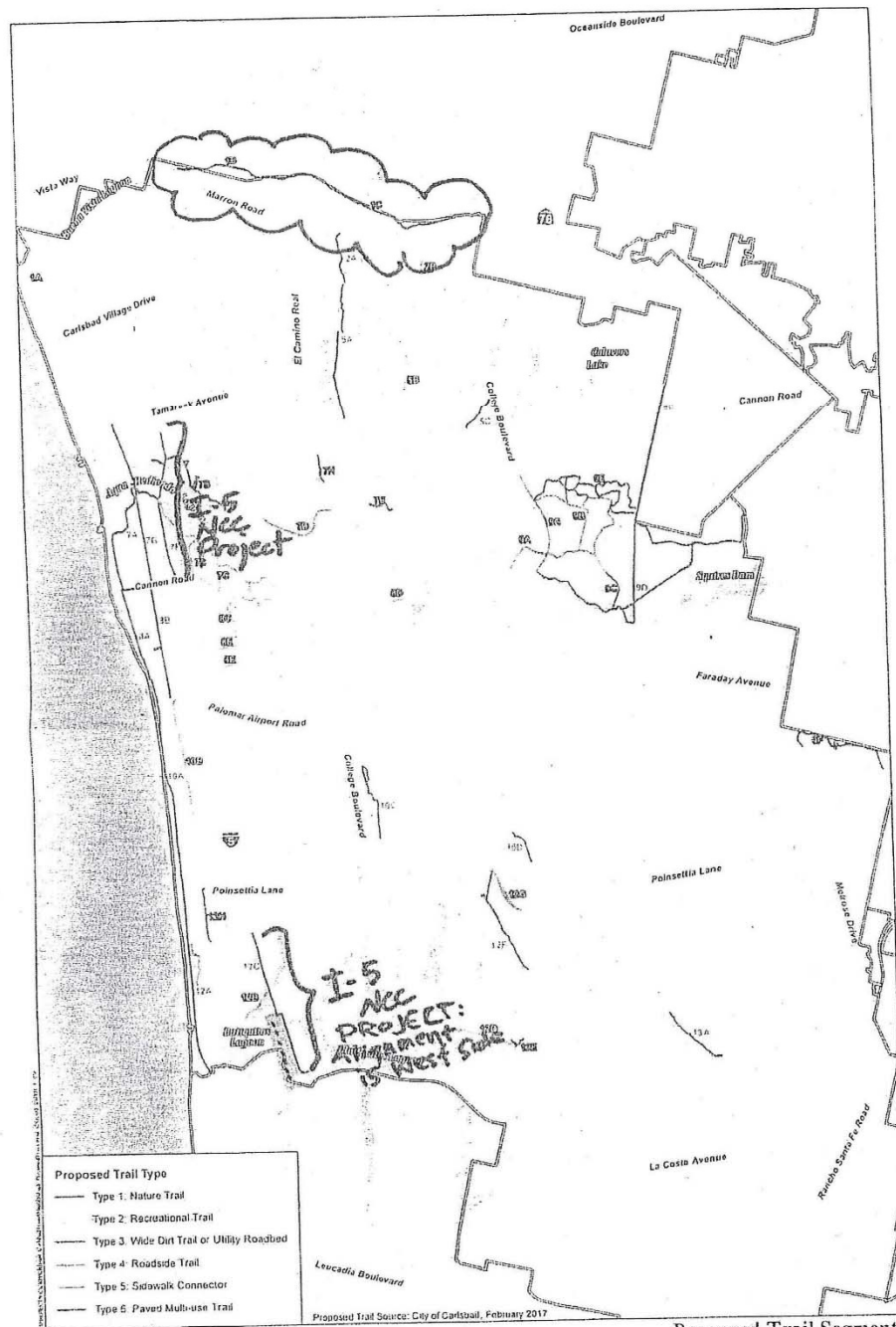
Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

Enclosure

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



Proposed Trail Segments

CARLSBAD TRAILS MASTER PLAN

Figure 5



Letter A – Scott Morgan, Director, State Clearinghouse and Planning Unit, May 3, 2017

- A-1 This comment letter confirms that the Draft IS/MND was distributed to various state agencies. One letter from a state agency, the California Department of Transportation (Caltrans), was attached to this letter. This letter, and responses to it, is included as Letter B. The City of Carlsbad has complied with statutory noticing obligations for documents pursuant to the California Environmental Quality Act (CEQA). Letters from two other state agencies (California Fish and Wildlife and the California Coastal Commission) were also submitted within the public review period; these letters are included as Letter C and Letter D, respectively.

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
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FAX (619) 688-4299
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*Making Conservation
a California Way of Life.*

April 26, 2017

11-SD-5, 78
PM VAR
City of Carlsbad Trails Master Plan
SCH#2017041006

Ms. Pam Drew
Associate Planner
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008-7314

Dear Ms. Drew:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation for Draft Environmental Impact Report (EIR) for the proposed City of Carlsbad Trails Master Plan located near I-5 and SR-78. The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

B-1 []

Figure 5 Proposed Trail Segments map shows the trail 12c as proposed on the eastern side of I-5, instead it should be shown on the west side of I-5. Please see the attachment.

B-2 []

Although there are no apparent conflicts with this trail plan in regards to Caltrans right of way in the current existing condition, there are two future major corridor projects proposed along SR-78: the I-5/SR-78 Connector project and the SR-78 Managed Lanes project. Both of these projects are currently in the final stages of completing the Project Initiation Document phase.

The two trails of particular concern are existing pathways the Haymar Road Trail that are listed as "Improvement Projects in the table on page 5-9 and are labeled as 1B and 1C in Figure 5, "Proposed Trail Segments."

Within the City of Carlsbad limits from I-5 to east of College Boulevard, the two future roadway projects will widen SR-78 in both directions to accommodate a new connector system at the juncture of I-5 and SR-78 and to add two managed lanes and other operational improvements along SR-78 from I-5 to I-15. Therefore, there may be

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Ms.Drew
April 26, 2017
Page 2

B-2
cont.

potential impacts to trails 1B and 1C since the trails are adjacent to the Caltrans right of way.

B-3

As the planning and/or design of these Haymar Road trails is further developed, we would appreciate the opportunity to review future documentation and to work with the City of Carlsbad to minimize potential conflicts between the future trail and SR-78 roadway projects.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

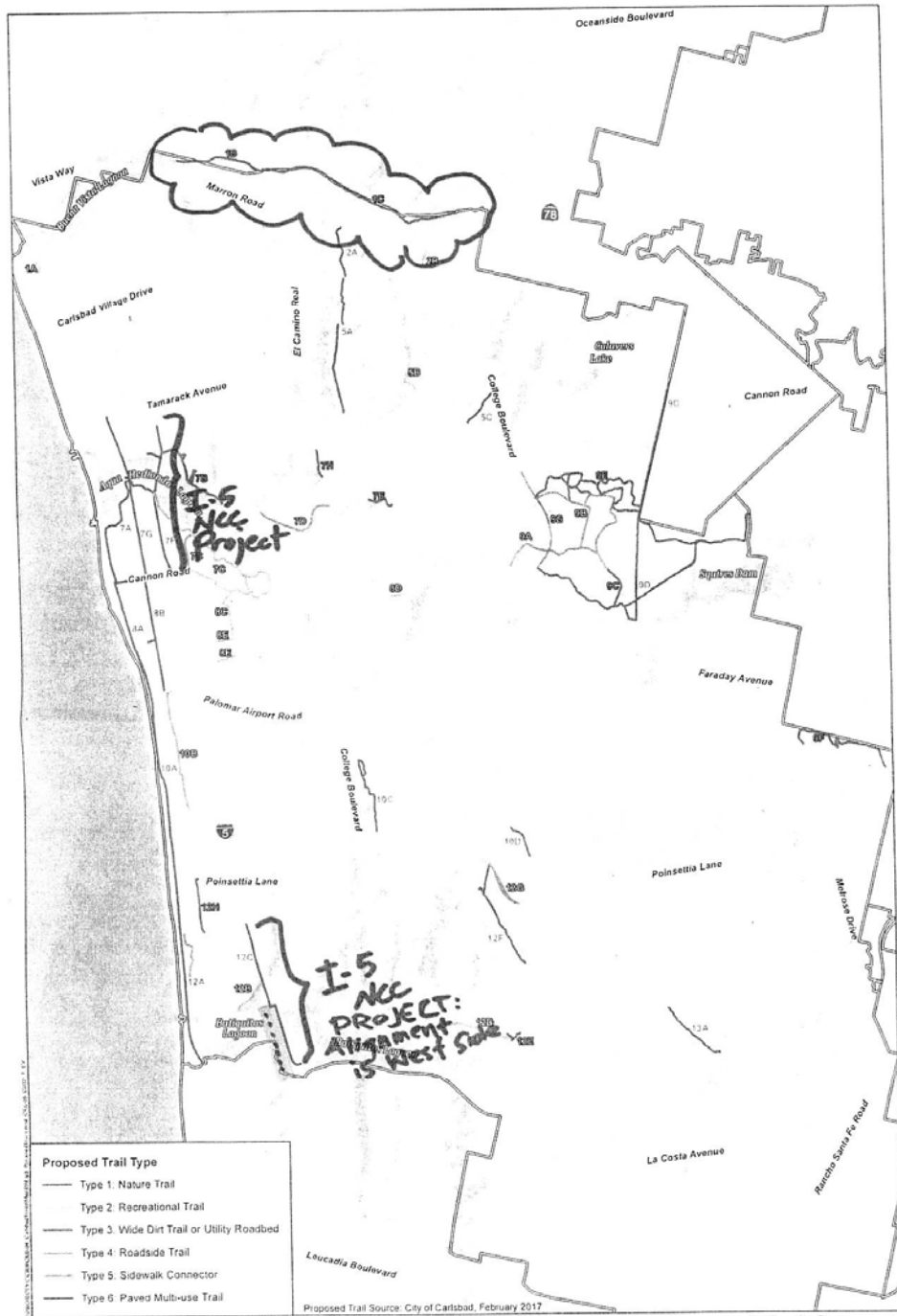
Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

Enclosure

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*



Proposed Trail Segments

CARLSBAD TRAILS MASTER PLAN

Figure 5



Letter B – Jacob Armstrong, Chief, Development Review Branch, California Department of Transportation District 11, April 26, 2017

- B-1 The comment advises that, trail Segment 12C should be shown on the west side of the I-5 Freeway, consistent with the adopted North Coast Corridor program. This correction will be made in the final TMP.

- B-2 The comment advises the city that Caltrans is in the Project Initiation Document phase for the I-5/SR-78 Connector project and the SR-78 Managed Lanes project, and that these projects may impact planned trails 1B and 1C due to the potential future highway widening. The city notes that these two trail segments are proposed within the city’s existing right-of-way or within SDG&E’s utility easement and will not encroach into existing Caltrans right-of-way.

- B-3 The comment requests the opportunity to work with the city to minimize potential conflicts between future trails 1B and 1C and the SR-78 highway projects. Carlsbad staff will coordinate with Caltrans during planning for our respective projects to ensure that future widening of SR-78 beyond its existing right-of-way accommodates these planned trails.



U.S. Fish and Wildlife Service
 Carlsbad Fish and Wildlife Office
 2177 Salk Avenue, Suite 250
 Carlsbad, California 92008
 760-431-9440
 FAX 760-431-9624



California Department of Fish and Wildlife
 South Coast Region
 3883 Ruffin Road
 San Diego, California 92123
 858-467-4201
 FAX 858-467-4299

In Reply Refer To:
 FWS/CDFW-SDG-17B0236-17CPA0117

May 5, 2017
Sent by Email

Mr. Don Neu
 Planning Director
 City of Carlsbad
 Community & Economic Development
 1635 Faraday Avenue
 Carlsbad, California 92008-7314

Attention: Pam Drew, Associate Planner

Subject: Comments on the Draft Mitigated Negative Declaration for the City of Carlsbad Trails Master Plan, City of Carlsbad, California

Dear Mr. Neu:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Draft Mitigated Negative Declaration (DMND) dated March 2017, for the City of Carlsbad (City) Trails Master Plan (Plan). The comments provided herein are based on information provided in the DMND; a meeting attended by the Wildlife Agencies on March 3, 2016; our knowledge of sensitive and declining vegetation communities in the County of San Diego; and our participation in regional conservation planning efforts including the City's Multiple Habitat Conservation Program Subarea Plan/Habitat Management Plan (HMP).

C-1

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 Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act, and administers the Natural Community Conservation Planning (NCCP) program. The City is participating in the Department's NCCP and the Service's HCP programs through the implementation of its HMP.

C-2

Currently there are approximately 67 miles of trails in the City, and the Plan proposes 38 miles of new trails along 41 segments that cross City, private, and other public lands. The new trails

C-2
cont.

are categorized into six types: nature, recreational, wide dirt/utility roadbed, unpaved roadside, sidewalk connector, and paved multi-use. New trails are proposed through many portions of the HMP Preserve, which supports sensitive native habitats including coastal sage scrub, coast live oak woodland, southern maritime chaparral, grassland, riparian woodland, and wetland. Although no focused biological surveys were conducted, the draft DMND states that the following sensitive plant and animal species have the potential to occur in areas where trail segments are proposed: the federally endangered and HMP-narrow endemics Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *glandulosa*) and San Diego ambrosia (*Ambrosia pumila*), federally threatened and state endangered thread-leaved brodiaea (*Brodiaea filifolia*), federally and state endangered least Bell’s vireo (*Vireo bellii pusillus*), federally threatened coastal California gnatcatcher (*Polioptila californica californica*), and Nuttall’s scrub oak (*Quercus dumosa*). In addition, the proposed trail segments were identified as having no, low, or high constraints with respect to biological resources.

The DMND states that project-specific biological surveys including focused rare plant and wildlife surveys will be required for some of the trail segments that have low constraints (e.g., 7D, 9A, 9C, 10B) with respect to biological resources and all segments that have high constraints (i.e., 5B, 7A [west of I-5], 7B, 7C, 7H, 8B, 9D, 12D, and 12E). The City also proposes to mitigate any unavoidable impacts to sensitive natural communities consistent with the HMP.

We offer the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with all applicable requirements of the HMP:

C-3

1. Although the DMND evaluated the proposed Plan’s consistency with the HMP, in particular Section F.2.B. *Recreation and Public Access*, we do not agree with the City’s conclusion that the proposed Plan is consistent with the HMP, and that impacts to sensitive biological resources will be avoided, minimized and mitigated to less than significant by the incorporated mitigation measures. The overarching goal of the HMP is to “contribute to regional biodiversity and the viability of rare, unique, or sensitive biological resources throughout the City of Carlsbad and the larger region...” (p. A-1). The HMP also states that conservation is the first priority for the preserve system...” (p. F-12). Important biological resources in the City include habitat areas associated with the three coastal lagoons, coast live oak woodland, southern maritime chaparral, coastal sage scrub, riparian scrub, and wetland. Significant populations of California gnatcatcher, federally and state endangered light-footed Ridgway’s (=clapper) rail [*Rallus obsoletus* (=longirostris) *levipes*; Ridgway’s rail], state endangered Belding’s savannah sparrow (*Passerculus sandwichensis beldingi*), thread-leaved brodiaea, and Del Mar manzanita occur in the HMP Preserve. In addition, the HMP Preserve includes mitigation areas and lands used to fulfill NCCP/HCP conservation and mitigation obligations for projects prior to the establishment of the HMP Preserve.

C-4

Consistent with the management recommendation listed on p. F-12 of the HMP:
2) *Develop a Recreation Plan or Review Existing Plans for Compliance*, which

C-4 cont.		includes “monitoring existing recreational activities that are consistent with biological goals”, we request to meet with the City to revise the Plan to include a recreation monitoring, management, enforcement, and restoration program to help ensure consistency with the HMP. The revised Plan should also identify authorized trails as well as unauthorized trails to be closed and revegetated. A recreation monitoring, management, enforcement and restoration program would help ensure that: (1) habitat degradation will be minimized as part of trail use and maintenance, (2) negative impacts to surrounding sensitive resources will be minimized and/or mitigated, and (3) areas of high resource conservation are identified such that trail closures, during certain times of year, could be considered.
C-5		
C-6		
C-7		2. The HMP anticipated some level of public use of the Preserve but noted that excessive or uncontrolled access can result in “habitat degradation through trampling and erosion (e.g., along trails) and disruption of breeding and other critical wildlife functions at certain times of year” (p. F-11). In addition, it is important for the City to recognize that the basis for accepting HMP Preserve lands as mitigation for impacts to covered species includes the commitment to manage the lands so that habitat conditions for wildlife are sustained or improved and are not degraded over time by human activities.
C-8		3. We are concerned that establishing trails throughout the majority of the HMP Preserve will further degrade the core habitat areas (i.e., areas not subjected to either direct or indirect human-related impacts) identified in the HMP. While public access may not totally preclude wildlife use in areas with trails, studies indicate that it may hinder or alter wildlife behavior and temporal use of the Preserve. The Del Mar Mesa Enforcement Project (SANDAG 2015) suggests that daily wildlife use is correlated with human use and found that once unauthorized trail use was curtailed, a shift in the use of the Del Mar Preserve by wildlife from mostly at night, to morning and evening hours was observed. Another study documented a three times greater rate of nest abandonment, and half the nest success rate, for an endangered passerine species in habitat having trails used by mountain bikes compared to non-biking sites (Davis <i>et al</i> 2010). Finally, a study (Patten <i>et al.</i> 2017) conducted in the County of Orange Central/Coastal NCCP/HCP Reserve using 10 years of camera trap data found that seven mammal species avoided areas of high human use regardless of the type of human activity (e.g., hiker, mountain biker, equestrian, dog walker) and camera placement. The overall trend was sharply negative: as human activity increases, mammal activity decreases.
C-9		Observed human-induced diel shifts by mule deer and coyote have important ramifications for predator-prey dynamics. For example, mule deer, a primary consumer, shifted its use from near sunrise to after sunset, which brought it into closer temporal alignment with its chief predator (mountain lion), while the coyote, a secondary consumer, shifted its use from shortly before dawn to shortly before midnight, which brought it into closer temporal alignment with a chief source of prey (gray fox). A primary management goal for the HMP Preserve should be to maintain substantial areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to

C-9
cont.

ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, etc.

C-10

4. Chapter 7 of the Plan outlines the trails maintenance and operation activities, and mentions the possible closure of problematic trails (p. 7-3); however, Table 7.1 does not include a regular assessment of habitat conditions along trail segments. Therefore, it is unclear how the City will determine if current and future trails are contributing to/causing natural resource degradation across the HMP Preserve. For example, non-native invasive species tend to flourish along trail edges and trail widths tend to expand over time, especially if trails are used during and soon after rain events.

C-11

5. The DMND does not appear to distinguish between trails depicted as existing on Figure 4 and unauthorized trails when calculating Plan impacts to biological resources. We recommend these two trail types be analyzed separately. The term "existing trails" should only apply to those segments that were developed consistent with HMP planning and development guidelines, analyzed in a previous CEQA document, and whose impacts to habitat were avoided, minimized, and/or mitigated. "Unauthorized trails" in native habitat are paths that have been used/established over time and whose impacts to habitat have not been analyzed under CEQA and mitigated for in any way. Therefore, these unauthorized impacts to habitat are unaccounted for, especially in the HMP Preserve. Inclusion of these paths in the City's Plan as "existing" legitimizes them without analyzing or accounting for the original impacts. To the extent feasible, the Plan should include discussion of the origin of the trails through the habitat types addressed by the HMP, and whether habitat loss resulting from these segments was analyzed and/or addressed in a CEQA document or other planning document. Mitigation should be proposed for all unauthorized trails that are now included as part of the City's trails system.

C-12

C-13

C-14

6. According to the HMP (p. F-5), the Lake Calavera property is a mitigation bank for City public works projects. As City projects use the mitigation credits from this bank, an endowment amount will be deposited in a fund to provide for long-term management, which would include trail maintenance, habitat restoration, and enforcement. Please provide an update on the current status of the endowment and how much of the endowment can be used to enforce the current and proposed trails through this mitigation area.

C-15

7. Based on the GIS trails layer the City provided to the Wildlife Agencies, there are multiple trails bisecting the Lake Calavera property. In addition, the GIS layer differs significantly from the existing and proposed trails in the MND for the Lake Calavera Trails Master Plan. We previously commented on the MND for the Lake Calavera Trails Master Plan in our September 10, 2009, letter (Enclosure), and the Plan appears to include two trail segments that our letter said should be eliminated to ensure compatibility with the HMP.

C-16

- 8. According to the HMP (p. F-5), 266 acres of the Lake Calavera property “are being placed in permanent conservation.” Please provide acreage amounts for the trails proposed on the Lake Calavera property and ensure that 266 acres are still present for conservation as proposed by the HMP. Because this property is intended as mitigation, the City must ensure that only authorized trails will be used by the public and all other trails will be restored to native habitats. Lake Calavera’s long-term management is being implemented in accordance with the Lake Calavera Trails Master Plan, and all authorized trails must conform to and be consistent with this plan. The Lake Calavera Trails Master Plan should be referenced somewhere in the Trails Master Plan.

C-17

C-18

- 9. The Service and the State of California worked together to purchase the Buena Vista Creek Ecological Reserve with grants provided under Section 6 of the Act. Section 6 funding supports land acquisition for the recovery of federally listed species such as the California gnatcatcher and least Bell’s vireo, species present on the Buena Vista Creek property. The City proposes to locate trails on or near this Ecological Reserve, more specifically segments 1C, 2A, and 2B. The DMND states that segment 1C would be located within an existing utility easement or roadside right-of-way; however, it does not say that permissions have been granted by the utility holding the easement or by the Department, who is the underlying land owner. At present, Buena Vista Creek Ecological Reserve is closed to the public, and the Department does not support the trail alignments currently proposed by the Plan within or adjacent to it. During a pre-Plan meeting, the Department asked the City to delete these segments from Figure 4 *Existing and Proposed Trails*. We again make this request. The Wildlife Agencies need to more closely examine the intent of the original grant acquisition and what level of recreation, if any, was anticipated for this Ecological Reserve.

C-19

- 10. The City recently installed a sign at the Agua Hedionda Lagoon Kelly trail head that depicts “proposed/future” trails. These same proposed trails are also identified in the Plan and the DMND. The Department is concerned that the City has planned trails and other uses across and near Ecological Reserves and other ownerships within the HMP Preserve. Our key concern is the possible perception by the public that these proposed future trails/uses—although depicted in concept form—are authorized and/or otherwise acceptable to the landowner. In addition, the Department’s logo is shown on the Kelly trail head sign, which may add to that perception. The Department is concerned that this leads the public to believe these trails are inevitable, and may encourage the public to enter areas where trails are proposed, even though they are currently closed to the public. As the Department has not agreed to the proposed trail alignments, we request that the City refrain from including any proposed segments on Department-owned land on Figure 4 *Existing and Proposed Trails* of the DMND and all figures showing trail segments in Chapter 4 of the Plan, until agreements between the City and the Department can be reached regarding alignment, patrolling, enforcement, management, and maintenance. We also request that the City refrain from using the Department’s logo on City trails planning material until an agreement--or multiple agreements for each trail segment or property--can be reached, and remove the sign with our logo from the Agua Hedionda Lagoon Kelly trail head.

- C-20 11. Another area of the HMP Preserve that the Department would like to discuss is identified in the Plan as Subarea 6: Lake Calavera/Calavera Hills. Chapter 4 of the Plan states that Subarea 6 has the highest concentration of trails compared to any other subarea. Please clarify to the reader that many of these trails, especially those on Carlsbad Highlands Ecological Reserve, might not necessarily be “authorized trails”. Figure 4.7 of the Plan does not depict all of the “finger-type trails” that have been created throughout Carlsbad Highlands due to unauthorized uses. The Department acknowledges that unauthorized uses are prevalent on this Ecological Reserve and surrounding ownerships and we are currently working to resolve this issue. The Department would like to work with the City and their current Preserve manager in an effort to resolve unauthorized uses in this Subarea.
- C-21 12. Although the HMP Preserve is briefly mentioned in Section 3 no formal mention/description of the HMP was included in the Plan. We recommend that a description of the HMP including its goals and objectives as well as the purpose of the HMP Preserve be added to Section 1.5 *Local Planning Efforts* of the Plan.
- C-22 13. Please ensure that the Plan is consistent with the Management Recommendations stated in the HMP on page F-11 including, “Existing recreational facilities should be managed to promote the maintenance of habitat value surrounding these facilities”.
- C-23 14. We strongly recommend that all direct impacts to sensitive habitats be avoided and/or minimized. It is unclear how new proposed trails through habitat areas were avoided and/or minimized to the greatest extent feasible. For example, the proposed trail east of the existing North Shore Trail at Batiquitos Lagoon (e.g., 12D) is identified as wetland in the City’s habitat mapping.
- C-24 15. Although the DMND proposes to mitigate unavoidable impacts in accordance with the HMP, it does not identify where the mitigation will occur. In addition, the Wildlife Agencies note that both direct and indirect impacts must be mitigated, and indirect impacts may be up to 300 feet or more on either side of the proposed trails, depending on trail type, anticipated usage level, and the types of wildlife/species present. Therefore, as specific trail alignments and trail types become defined, the Wildlife Agencies will expect that mitigation will take into account indirect effects as appropriate.
- C-25 16. The DMND lists trail segment 5C as a “no” biological constraints segment since it will be located on an existing dirt road; however, there are many historic occurrences of California gnatcatcher in the vicinity of the proposed segment. We recommend changing the designation to “low” and requiring biological surveys for this segment. We further recommend that the most suitable gnatcatcher breeding habitat be avoided.
- C-26 In addition, non-covered HMP species designated as 2B.1 by California Native Plant Society (CNPS) (i.e., rare throughout their range with the majority of them endemic to California), such as California adolphia (*Adolphia californica*), are known to occur in the HMP Preserve. We also recommend both direct and indirect impacts to these species be avoided.

- C-27 17. Segment 9E is identified in the DMND as a trail that has undergone or is currently undergoing CEQA review. This 2.5 mile trail is part of the Cantarini project, which was approved in 2004. We were notified by the City that this project may require further CEQA review (Grim 2016, pers. comm.). In light of the recent studies on recreation cited above, we request the City work with us to redesign this trail alignment by eliminating redundant trails. This would further minimize impacts to the HMP Preserve area that will be dedicated as mitigation for the Cantarini project impacts.
- C-28 18. The Plan should include a detailed discussion of how users will be directed to stay on authorized trails through fencing and signage and enforcement by peace officers with citation authority. The Plan should also include dedicated funding and staffing to ensure that fencing, signage, and enforcement will be maintained across the trail system in perpetuity.
- C-29 19. Under Title 14, Section 630 (g), bicycles and horses are prohibited on the Department's Ecological Reserves. Please describe how these prohibitions will be enforced when connecting/adjacent trails (under non-Department ownership) may encourage these uses (e.g., segment 2A). Additionally, the Plan should address the need for Department staff or law enforcement to respond when these uses spill over to Department land.
- C-30 20. Areas identified as "open space" in the Plan should be further described as mitigation area, Ecological Reserve, HMP Preserve or any other applicable designation. These areas should be depicted on a figure with the proposed trail system so the reader can see where direct impacts will occur. As these areas were specifically set aside for wildlife use, we again strongly recommend that direct impacts be avoided but if unavoidable impacts do occur, they should be mitigated at a higher ratio than what is listed in the HMP.
- C-31
- C-32 21. The City should meet with all land owners, including the Department, where trails are proposed in order to seek approval and ensure the proposed Plan is compatible with the purposes of all affected properties. For example, although Figure 4 of the DMND and Figures 4.3 and 4.7 of the Plan indicate that trails through Carlsbad Highlands and Buena Vista Creek Ecological Reserves are not part of the proposed trail system, it still shows trail alignments through these properties and indicates City support for their completion. Instead, we recommend these alignments be removed from the Plan and that they not be depicted on any figures until agreements can be reached between the Department and the City.
- C-33 22. The Plan includes Goals and Objectives (p. 2-2). We recommend that an additional goal focus on the existing trails and their management, enforcement, maintenance, and monitoring. This should include the closure of unauthorized trails, preventing the creation of unauthorized trails, enforcement remedies for people creating and using unauthorized trails, monitoring erosion of trails, etc. The Plan does not actually cite a dollar amount that is currently dedicated to trail maintenance, monitoring, and enforcement. Region-wide, dedicated funding is lacking for such activities. The Wildlife Agencies are concerned that not enough funding is directed to these types of
- C-34

C-34
cont.

activities and increasing the amount of trails will only exacerbate the inadequate funding dilemma.

C-35

23. If an agreement is reached with the Department regarding trails within or adjacent to our Ecological Reserves, we recommend only Type 1 nature trails be considered unless trails are pre-existing and authorized. Currently, proposed segment 12D is depicted as a Type 2 recreational trail.

C-36

24. Due to the 2014 Poinsettia fire, which burned 295 acres of the HMP Preserve (<http://www.carlsbadca.gov/news/displaynews.asp?NewsID=1047&TargetID=1>), we recommend that trails adjacent to or within the HMP Preserve be closed to the public on Red Flag Warning days to reduce the potential for human-ignited wildlife. In Orange County, land managers have established a community-based Fire Watch program run by volunteers (see <https://www.irvinecompany.com/irvine-ranch-conservancy-and-ocfa-announce-fire-watch/>). Fire Watch provides a high level of visibility and deterrent during Santa Ana winds and Red Flag Warning days, and could help prevent or greatly reduce the damage caused by future fires in the HMP Preserve.

C-37

We appreciate the opportunity to comment on the DMND and look forward to working with the City to develop a Plan that is consistent with the HMP. If you have any questions regarding this letter, please contact Christine Beck (Department) at 858-637-7188 or Janet Stuckrath (Service) at 760-431-9440, extension 270.

Sincerely,

 Digitally signed by DAVID ZOUTENDYK
Date: 2017.05.05 13:52:35 -07'00'

for Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



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

Enclosure

LITERATURE CITED

Davis, C.A., D.M. Leslie Jr., W.D. Walter, and Allene Graber, 2010. Mountain Biking Trail Use Affects Reproductive Success of Nesting Golden-cheeked Warblers. *The Wilson Journal of Ornithology* 122(3):465-474.

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Personal Communication:

Grim, M. 2017. Planner, City of Carlsbad. Email on the Cantarini project. On file, Carlsbad Fish and Wildlife Office.

Letter C – Karen A. Goebel, Assistant Field Supervisor, U.S. Fish and Wildlife Service (USFWS), and Gail Sevens, Environmental Program Manager, South Coast Region, California Department of Fish and Wildlife (CDFW), May 5, 2017

- C-1 This comment is introductory, addressing the role of the USFWS and CDFW, collectively referred to herein as the “Wildlife Agencies,” with CEQA and with the city.
- C-2 This comment is introductory, summarizing the Wildlife Agencies’ understanding of the project location, description, and mitigation.
- C-3 This comment expresses the opinion that the proposed Trails Master Plan is inconsistent with the City’s Habitat Management Plan (HMP) and disagrees that significant impacts to biological resources would be avoided, minimized, and mitigated to less than significant through the incorporated mitigation measures.

Consistent with how the resources are described in the IS/MND, the Wildlife Agencies identify important biological resources in the city as habitat areas associated with the three coastal lagoons, coast live oak woodland, southern maritime chaparral, coastal sage scrub, riparian scrub, and wetland, in addition to several listed sensitive species. As stated in Section IV – Biological Resources, of the draft IS/MND, the project would be consistent with the HMP as stated in Policy 4-P.9 of the General Plan, which states in part, “Provide public access to open spaces areas where consistent with applicable access restrictions per the Habitat Management Plan, easements, deeds, etc.” Some trail segments are proposed within existing access roads and other disturbed or developed areas that lack the important biological resources and therefore no impact to sensitive habitat will occur. For those trail segments identified as having high biological constraints, the trail segment will be sited to avoid and/or minimize impacts to sensitive habitat. Where impacts to sensitive biological resources cannot be avoided mitigation measures BIO-1 through BIO-8 will be implemented to reduce potential impacts to less than significant.

- C-4 The Wildlife Agencies request a meeting with the city to revise the Trails Master Plan to include a recreation monitoring, management, enforcement, and restoration program to ensure consistency with the HMP, per an HMP goal to monitor existing recreational activities that are consistent with biological goals.

The city is in the process of coordinating future trail alignment, enforcement and management of the trails with the Wildlife Agencies. Previously, representatives of California Department of Fish and Wildlife (CDFW) and City of Carlsbad hiked the Buena Vista Ecological Reserve and Highland Reserve to evaluate future trail alignments and analyze existing conditions. Land managers, CDFW staff, Habitat Management Plan manager, and open space and trails manager coordinate enforcement and monitoring of open space and trails with the Carlsbad Police Department on a regular basis. This group meets on a quarterly basis as an Open Space Management Team to discuss consistency with the HMP, monitor activities in the city open space and coordinate any issues that may arise. The open space and trails manager also attends quarterly HMP meetings with the Resource Agencies to provide regular updates on the Trails Master Plan.

C-5 Some “unauthorized” trails that are identified as existing trails in the Trails Master Plan are informal trails through HMP Preserve areas that have been there for some time. The Wildlife Agencies suggest closing these unauthorized trails and revegetating them. However, these trails are part of the existing baseline condition for purposes of CEQA. Some of these trails may have already been in place when the HMP Preserve areas were formally established. CEQA does not require an agency to mitigate for impacts that are part of the baseline condition, because they are not impacts that would be occurring as part of the proposed Trails Master Plan. In other words, these effects would be occurring with or without approval of the Trails Master Plan. Implementation of the Trails Master Plan would not worsen these potential effects that are already occurring, and may improve general conditions in areas where the Trails Master Plan would implement features that better define where users can and cannot go within the HMP areas. Last, the HMP Preserve areas are subject to existing long-term management plans and area specific management directives for monitoring, enforcement, and restoration, including management and maintenance of areas susceptible to erosion and non-native vegetation recruitment, such as abandoned and relict trails.

C-6 The project includes several measures to protect biological resources within sensitive habitat, as discussed in the Trails Master Plan and Section IV of the IS/MND. Habitat degradation from use and maintenance, negative impacts to surrounding sensitive resources, and areas of high resource conservation have been accounted for in the IS/MND. For example, fencing on the trails will be provided in certain areas. Signage would also be provided to remind users to stay on the trail.

Under Section 7.4 of the Trails Master Plan, seasonal trail closures are mentioned as being potentially necessary to avoid or minimize impacts to sensitive habitat and wildlife, and the Wildlife Agencies are listed to be consulted with during the trail development process. Permanent trail closures may also occur for trail segments that adversely impact sensitive environmental resources. In addition, where impacts would be potentially significant, mitigation measures BIO-1 through BIO-8 have been identified to reduce impacts to less than significant. See responses C-4 and C-5 regarding existing long-term management plans and area specific management directives for monitoring, enforcement, restoration, maintenance, and management of trails within existing HMP Preserve areas.

Regarding enforcement, observance of violations would be reported to the Carlsbad Police Department. A General Enforcement Authorization Agreement allows the Carlsbad Police Department and any other law enforcement agency to enforce any federal, state or local laws on the private properties that are part of the open space HMP Preserve. In addition, on May 16, 2017, the Carlsbad City Council approved a resolution to establish a pilot program establishing two full-time ranger positions with citation authority dedicated to monitoring the city’s open space and trails. Rangers have been hired and trained, and are now on active duty. The Ranger Program is now permanent and fully funded by the City of Carlsbad. Last, many of the trails traverse existing trails within existing HMP Preserve areas that already have area-specific management directives for monitoring, enforcement, and restoration. The HMP preserve manager and individual preserve managers coordinate closely with various city departments to ensure preserve lands in the city are being managed consistent with the HMP. Fencing, signage, and other efforts to formalize existing trails that have been in place and use for many years will be a benefit to the HMP Preserve areas.

- C-7 The comment acknowledges that the HMP anticipates some level of public use, but warns against uncontrolled access leading to habitat degradation. See responses C-3 through C-6. Through trail design and implementation of mitigation measures BIO-1 through BIO-8, trails in the Trails Master Plan will not result in excessive or uncontrolled access that will result in significant habitat degradation or disruption of breeding or other critical wildlife functions. These measures are intended to restrict and confine trail use to within the least environmentally sensitive areas that lack sensitive biological resources. As discussed above, seasonal trail closures may occur where necessary. In addition, implementation for the Trails Master Plan would not worsen potential effects that are already occurring in unauthorized trails within the HMP, and may improve general conditions in areas where the Trails Master Plan would implement features that better define where users can and cannot go within the HMP areas.
- C-8 The comment cites studies that have shown human activity may alter wildlife use in the preserves. As discussed above, implementation of the Trails Master Plan would not worsen potential effects that are already occurring in unauthorized trails within the HMP, and may improve general conditions in areas where the Trails Master Plan would implement features that better define where users can and cannot go within the HMP areas. Human activity is already occurring in these areas, and this human activity would be better regulated through fencing, signage, and other measures that are proposed as part of the Trails Master Plan.
- C-9 In this comment, the Wildlife Agencies state that a primary management goal of the HMP Preserve should be to maintain substantial areas insulated from human activities. The Trails Master Plan would be consistent with this management goal. Proposed trails in HMP Preserve areas would occur in areas that are currently used as informal trails. This human activity would be better regulated through fencing, signage, and other measures that are proposed as part of the Trails Master Plan. The substantial areas of the preserve that are insulated from human access and related sources of disturbances would remain.
- C-10 Regarding how the city will determine if current and future trails are contributing to or causing natural resource degradation in the HMP Preserve, this will be accomplished through regular maintenance and enforcement of the mitigation measures identified in the IS/MND. Specifically, the referenced non-native invasive species would be mitigated by measure BIO-7, which requires city staff to inspect trail edges for signs of non-native invasive plant species as part of the city's routine maintenance inspections in or near HMP Preserve areas. If plant species are confirmed, the city would coordinate with the HMP preserve manager to determine the specific actions and responsibilities for treatment and removal, which are further described in the IS/MND.

It is also important to keep in mind that a number of the preserve areas are under active management, which means they have management plans that have been approved by the wildlife agencies, have a designated preserve manager, and have a dedicated funding source to carry out management activities. The management plans contain provisions for ongoing assessment and monitoring for threat to the preserves, including from public use. These plans identify objectives and actions to be taken in response to threats of habitat degradation.

- C-11 The comment recommends that existing authorized trails be distinguished and analyzed separately from unauthorized trails. Please see response C-5.

- C-12 The comment suggests that the plan should discuss the origin of trails through habitat types addressed by the HMP, and whether habitat loss through these segments was addressed in a previous CEQA document. Please see response C-5.
- C-13 The comment states that mitigation should be proposed for all unauthorized trails that are now included as part of the trails system. See response C-5. For the proposed Trails Master Plan trails that would occur within existing informal trails, if new biological resources impacts are identified, they would be mitigated through BIO-1 through BIO-8.
- C-14 The comment requested the status of funding endowment for the long-term management of Lake Calavera preserve and how much can be used to enforce existing and proposed trails. As with all city-owned preserve lands, long-term management of the Lake Calavera mitigation parcel is being funded through a permanent allocation of the General Fund that has been established for this purpose. Through this budget allocation, the city has contracted with the Center for Natural Lands Management to conduct regular biological monitoring and management, including maintenance of fences and signage, closure of unauthorized trails, regular patrols, invasive species removal, and public outreach. Additional funds are provided as needed by the Parks & Recreation Department for regular trail maintenance, and by the Police Department for trail enforcement through the Ranger Program. The Parks & Recreation Department provides additional resources for Lake Calavera mitigation parcel through the Trails Volunteer Program work events (i.e., trail repair, installation of signage and fencing, trash pick-up), and monthly trail inspections which are conducted by Trail Captains.
- C-15 The comment notes that the Trails Master Plan Geographic Information System (GIS) trails layer that the city supplied to the Wildlife Agencies differs from the map in the IS/MND in that two trails traversing the Lake Calavera Master Plan were included. The city apologizes for the error and will submit the current version of GIS layer for the Trails Master Plan in which the two trails in question have been removed. The TMP trails maps will be revised to remove trails not authorized in the Lake Calavera Trails Master Plan.
- C-16 The comment states that all authorized trails at Lake Calavera must conform to and be consistent with the Lake Calavera Trails Master Plan project. There are no new trails proposed at the Lake Calavera Preserve. The Lake Calavera Trails Master Plan, HMP 09-05 Mitigated Negative Declaration adopted on January 25, 2010 outlined upland and wetland mitigation measures as a condition of approval for trail development within the 266-acre preserve. One acre of upland mitigation has been created for impacts for the trails and is consistent with the resource agencies' requirements (see *5-Year Wetland Mitigation & Monitoring Plan for the Lake Calavera Trails Master Plan Boardwalk Improvements Project*, prepared by Dudek & Associates).
- Wetland impacts for the boardwalk trails were mitigated in accordance with the Conceptual Wetlands Mitigation & Monitoring Plan for the Lake Calavera Trails Master Plan Boardwalk Improvement Project, dated August 2011. The wetland mitigation/revegetation is currently in year 5 of the 5-year maintenance, monitoring, and reporting period (see *Lake Calavera Upland Mitigation Plan, Lake Calavera Wetland Mitigation Plan and HMP 09-05 MND*).
- C-17 The comment requests that the citywide Trails Master Plan include a reference to the Lake Calavera Trails Master Plan. Such a reference will be included in Section 4.1 Subarea 6 - Lake Calavera.

C-18 The comment notes that Buena Vista Creek Ecological Reserve (BVCER) was acquired by state and federal wildlife agencies for habitat protection purposes. The BVCER is closed to the public, and therefore the wildlife agencies are not supportive of proposed trail alignments within or adjacent to the preserve. The comment also points out that the IS/MND does not state whether the city has obtained permission to open trails within the existing utility easement in the preserve. Upon adoption of the Trails Master Plan, the city will seek permission from the utility companies to grant trail easements for individual segments. The city supports trail connectivity through the BVCER in compliance with the City of Carlsbad General Plan Mobility Element. However, we understand that the trail is proposed on the CDFW's land, and that CDFW's primary goal for the BVCER is protection and preservation of habitat. Staff has met with CDFW to try to develop a solution that is acceptable to the resource agencies, however the area is currently closed to recreational use per CDFW regulations.

C-19 The comment expresses concern that depicting proposed trails through CDFW land in the TMP, and posting signs advertising "future" trails such as at the Agua Hedionda Lagoon Kelly Drive trail creates a public perception that the Department authorizes and encourages public use. Since no such authorization has been given, commenter requests that proposed trails be removed from the plan and that the existing Kelly Drive sign be taken down.

One of the purposes of the TMP is to present the long-term plan for implementing the citywide trails system, including existing and planned future trails. The plan acknowledges that full implementation of the system will require a number of actions, including obtaining permission from property owners such as CDFW. The city maintains that the TMP text, tables and maps clearly distinguish existing trails from planned future trails, and do not lead the reader to conclude that the public may use non-existent, proposed trails. To remove proposed trails from the plan as the commenter requests, would eliminate the plan's essential purpose and make meaningful analysis and preparation impossible. The city therefore declines this request. The city will, however, collaborate with CDFW to develop solutions that are acceptable to the resource agencies to allow for monitored and responsible passive recreation for any trail segments that are located on land owned by the resource agencies.

The city will cover the CDFW logo on the interpretive panel at the Kelly Drive Trail, as requested.

C-20 The comment states that that unauthorized trail use is prevalent in the Carlsbad Highlands Ecological Reserve (TMP Subarea 6), and requests the city's cooperation in resolving such unauthorized use. None of the unauthorized trails are shown in the Highlands reserve on the Subarea 6 Map. A reference about collaboration on managing unauthorized uses between city and resource agencies will be added in Chapter 4, Subarea 6.

C-21 The comment requests that a broader discussion of the HMP be included in the Trails Master Plan. In response to this comment, a description of the HMP, including its goals and objectives, as well as the purpose of the HMP preserve system, will be added to Section 1.5 Local Planning Efforts.

C-22 The comment requests that the TMP be consistent with the management recommendations stated in the HMP. The Trails Master Plan is a concept level planning tool. Each proposed trail

segment would be reviewed for consistency with HMP, including the cited Management Recommendations, when it becomes a project and undergoes standard CEQA review.

- C-23 The comment questions how proposed trails through habitat areas will avoid or minimize direct impacts to sensitive habitats to the greatest extent feasible. The analysis within the IS/MND is at the programmatic level and includes analysis based on the currently available information on each trail segment. Where potentially significant impacts have been identified at the program level, further analysis will be required at the project level that will analyze conditions and impacts for each proposed trail segment once the specific alignment and other project-specific details are available. If significant biological resources impacts are identified for the proposed trail, mitigation measures BIO-1 through BIO-8 will be implemented as applicable. Implementation of these measures would ensure that impacts to biological resources would be minimized or avoided.

Regarding Trail 12D, the proposed trail would follow an existing dirt path and other disturbed and developed land within an area mapped as “wetlands” in the city’s data. Also, trail type designation will be changed from Recreational Trail Type 2 to Nature Trail Type 1 to minimize any impacts to the existing habitat.

- C-24 The comment states that the IS/MND does not identify where mitigation will occur, and that both direct and indirect impacts must be mitigated. Please see response C-23. Trail-specific impacts will be analyzed at the project level, and direct and indirect impacts to biological resources will be mitigated through BIO-1 through BIO-8.
- C-25 The comment recommends the biological constraints assessment of Trail 5C be changed and the comment recommends the biological constraints assessment of Trail 5C be changed and that the most suitable gnatcatcher breeding habitat be avoided. The city agrees with the Wildlife Agencies assessment of Trail 5C, and the designation has been changed to “low” in the IS/MND and Constraints Report. It is also noted that Trail 5C occurs entirely within an existing, gravel-lined SDG&E access road immediately adjacent to the existing residential development. The trail is already subject to pedestrian and maintenance vehicle uses and the general area is already subject to indirect noise, lighting, and other edge effects from the existing residential development. Nevertheless, the sensitivity of the area is acknowledged and potential impacts to gnatcatchers would be avoided or minimized through implementation of mitigation measures BIO-3 and BIO-5.
- C-26 The comment recommends that direct and indirect impacts to non-covered HMP species be avoided. Impacts to rare plants would be mitigated through mitigation measure BIO-2, which implements rare plants surveys, and in the case that rare plants would be impacted, would implement the required conservation standards in the city’s HMP. In addition, the proposed trails in the HMP Preserve occurs within existing footprints that are traveled by human activity; rare plants would not be expected to grow within these footprints due to the continual disturbance.
- C-27 The comment requests that the city work with CDFW to simplify Segment 9E to eliminate redundancy and minimize impacts to the HMP Preserve. This comment does not address the adequacy or accuracy of information provided in the IS/MND. The revised TMP will show a simplified outline of the trail minimizing impacts to the habitat, however the final alignment will

be developed in the project development phase in collaboration with the CDFW and the developer.

- C-28 The comment requests that the TMP address how trail use will be controlled, enforced and maintained over time. The TMP includes a detailed discussion of how users will be directed to stay on authorized trails. Chapter 6 Trails Standards includes information on signage and fencing, and Chapter 7 Trail Operations describes maintenance, monitoring and enforcement procedures. In addition, on May 16, 2017, Carlsbad City Council approved a resolution to establish a pilot program establishing two ranger positions with citation authority dedicated to monitoring the city's open space and trails. The Ranger Program is now permanent and fully funded by the City of Carlsbad. Please see response C-6.
- C-29 The comment expresses concern about bicycle/equestrian spill-over use into CDFW preserves, as such use is prohibited by state regulations. There are only two locations in the city where equestrian use is allowed; these areas tie into the Olivenhain Equestrian Trail network and not to the CDFW Ecological Reserves. Regulation signs are posted, and observance of violations are to be reported to the Carlsbad Police Department. The General Enforcement Authorization Agreement allows the Carlsbad Police Department and any other law enforcement agency to enforce any federal, state or local laws on the private properties that are part of the HMP Preserve. In addition, the City Council established a Ranger Program, which began on July 1, 2017, to help patrol the open space in the city, including the preserves, trails, lagoons, beaches, and parks.
- C-30 The comment requests that more detail be added to areas identified as open space, so reader will have a better understanding of where ecological resources may be present. Ecological Reserves and HMP areas are already shown on Figure 5.1 Composite of Existing and Proposed Trails. Staff will include this information on Figure 3.2 HMP Preserve System.
- C-31 The comment repeats a recommendation that direct impacts be avoided as much as feasible, but that unavoidable impacts be mitigated at ratios higher than those stated in the HMP. The IS/MND summarizes the biological and cultural constraints related to proposed locations and identifies a list of mitigation measures to avoid or minimize impacts. Per mitigation measure BIO-4, if project-specific studies identify unavoidable impacts to sensitive natural communities and/or habitat occupied by sensitive species, as applicable, the city, private applicant, or other public agency shall mitigate impacts in accordance with the mitigation ratios and requirements specified in Table 11 (page D-113) of the city's HMP, and for projects within the coastal zone, the additional Coastal Zone Standards listed on pages D-114 through D-120. Final mitigation ratios will be determined in consultation with the Wildlife Agencies for those projects resulting in unavoidable impacts to sensitive habitat within HMP Preserve, Ecological Reserve, and other areas that are preserved in perpetuity.
- C-32 The comment requests that the city meet with land owners, including CDFW, where trails are proposed to seek approval and ensure the proposed Trails Master Plan is compatible with the affected properties. As requested, city staff has initiated discussions with CDFW to develop an alignment of the proposed trails in the BVCER and Carlsbad Highlands Ecological Reserve that would allow for controlled passive recreation in these areas.

Previously, representatives of CDFW and City of Carlsbad hiked the BVCEP and Carlsbad Highlands Ecological Reserve to evaluate future trail alignments and analyze existing conditions. However, the BVCEP is currently closed to recreational use and Carlsbad Highland use is limited to trail segment 6.5, which allows hiking only per General Regulations for Public Use on All Department of Fish and Wildlife Lands (14 CCR 550). Also see response C-18.

- C-33 The comment recommends that the TMP include a goal to address management, monitoring, enforcement, maintenance, and monitoring of existing trails. As requested, the city will add trails management, monitoring and enforcement goal to Section 2.2 Trails Master Plan Goals and Objectives. Please see response C-6 regarding enforcement and monitoring of trails.
- C-34 The comment notes that Trails Management Plan does not specify the level of funding currently dedicated to trail maintenance, monitoring, and enforcement. Parks & Recreation Department's operating budget accounts for the trail maintenance expenses. Trails Maintenance costs currently average ~\$5,000 per linear mile. Contracted trail maintenance is supplemented through the work of dedicated staff together with organized trail volunteer groups who perform frequent trails maintenance, including trail tread repairs, erosion control, closing illegal trails, fencing, planting, weeding and installation of signage. In 2017 the City of Carlsbad received a grant from SANDAG in the amount of \$98,280 to develop a pilot program establishing two ranger positions with citation authority dedicated to monitoring city's open space and trails. City of Carlsbad matched the grant and provided an additional \$137,320 for the fiscal year 2017/18. The Ranger Program is now permanent and fully funded by the City of Carlsbad. In addition, the city has a contract with a private security company in the amount of \$29,952/year, which allows for additional monitoring of four city preserves: Lake Calavera, Hosp Grove, Veterans' Park, and La Costa. Also see response C-6 and C-28. This comment does not address the adequacy or accuracy of information provided in the IS/MND.
- C-35 The comment recommends that trails that are within or adjacent to CDFW's Ecological Reserves be limited to Type 1 nature trails unless the trails are pre-existing and authorized. The city agrees with the recommendation and in response to this comment will change trail 12D from a Type 2 Recreational Trail to a Type 1 Nature Trail in the Trails Master Plan and the final IS/MND. This revision would not alter the conclusions or analysis in the IS/MND.
- C-36 The comment recommends that the city close trails adjacent to or within the HMP Preserve area during Red Flag Warning Days to reduce the potential for human-ignited wildfires. The city currently does not close trails on Red Flag Warning Days but will consider the possibility of taking this action in the future.
- C-37 The comment closes the letter and expresses the interest of CDFW to work with the city to develop a Plan that is consistent with the HMP. As noted in responses C-2 through C-36, the Trails Master Plan is currently consistent with the HMP; however, the city will continue to work with the Wildlife Agencies to address their concerns.

CALIFORNIA COASTAL COMMISSION

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May 5, 2017

Pam Drew
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008

Re: City of Carlsbad Draft Trails Master Plan

Dear Ms. Drew:

Thank you for the opportunity to review and provide comments on the City's Trails Master Plan. The proposed Trails Master Plan provides guidance for future trail development that will complement, and provide connections to, existing public access and recreational amenities in the coastal zone. To ensure that the proposed Trails Master Plan is consistent with the public access and recreation, habitat protection, and other coastal resource protection policies in the California Coastal Act and the City's certified Local Coastal Program (LCP), Commission staff offers the following comments on the proposed Trails Master Plan.

D-1 [Rather than incorporate the entire Trails Master Plan into the City's LCP, Commission staff recommends that the City integrate key components of the Trails Master Plan through the City's ongoing comprehensive LCP update process. Therefore, the following comments also recommend key figures and concepts from the Trails Master Plan that should be included in the LCP comprehensive update.

Trails Master Plan

D-2 [Public access is a key component of the California Coastal Act and the City's certified LCP, however discussion of the LCP is missing from the Trails Master Plan. Section 1.5 Local Planning Efforts (beginning on page 1-2) describes other City planning efforts related to trails and quotes key objectives and policies from those planning documents. The LCP and relevant policies should be included in this section.

D-3 [Section 3.7 Existing Private Property Ownership states that obtaining trail easements on small privately owned parcels is challenging and should be avoided (page 3-4). Within the coastal zone, however, where the LCP requires dedication of an easement for public access, the City and the Coastal Commission routinely obtain access easements for future trails as conditions of approval for private development. The Trails Master Plan should be updated to address this opportunity to expand trail development within the coastal zone.

- D-4 To demonstrate how existing and planned trails provide connections and access to coastal resources, coastal access points, including beach accessways and vista points, should also be added to Figure 3.5 Composite Map of Existing Trails (page 3-15) and Figure 5.1 Composite of Existing and Planned Trails (page 5-5).
- D-5 The Trails Master Plan does not describe all the trails that are contemplated in the LCP. For example, Policy 7-6 of the Mello II Land Use Plan calls for an access trail along the south shore of Buena Vista Lagoon and requires that permits for development of lagoon fronting property include as a condition of approval offers to dedicate lateral accessways across those properties for a future trail. The Trails Master Plan should address all trails identified in the LCP.
- D-6 Implementation of any of the trail projects identified in the Trails Master Plan that are located within the City's coastal zone will require a coastal development permit and must be consistent with applicable LCP policies. Section 6.3 Design Considerations of the Trails Master Plan should be updated to acknowledge that trail development within the coastal zone must be consistent with the requirements of the LCP.
- D-7 The Trails Master Plan acknowledges the potential conflict between conservation of sensitive habitats and provision of trails through these areas. The discussion of sensitive habitat and wildlife in Section 6.3 Design Considerations (page 6-15) should clarify that trail development within *or adjacent to* sensitive habitat areas should be evaluated for adverse impacts, and must be consistent with LCP policies protecting environmentally sensitive habitat areas. The Trails Master Plan should also identify best management practices to avoid, minimize, and/or mitigate adverse impacts to sensitive habitats and species associated with trail design, construction and operation.
- D-8 The Trails Master Plan acknowledges that sea level rise will impact many of the existing and planned trails along the City's coast and lagoons (Section 6.3 Design Considerations on page 6-16). Adaptation planning for existing and future trails is critical for ensuring continued public access to coastal resources required by the Coastal Act and City's LCP.
- D-9 Section 7.4 Trail Closures describes when and how trails may be closed permanently, but should note that permanent closure of a trail located within the coastal zone will require a coastal development permit to analyze alternatives to trail closure and evaluate the impacts any closure will have on coastal access.
- D-10 Comprehensive LCP Update
The following portions of the proposed Trails Master Plan should be included in the City's comprehensive LCP update:
Figure 1.2 Composite of Regional Trail Projects (page 1-11) from the Trails Master Plan should be added to the LCP through the comprehensive update process along with a description of the California Coastal Trail. The LCP update should also describe a

May 5, 2017
Page 3

D-10
cont.

planning and implementation process to complete the California Coastal Trail and formally designate existing trails that are part of the route through Carlsbad.

D-11

Figure 5.1 Composite of Existing and Planned Trails (page 5-5) from the Trails Master Plan showing all existing and planned trails should be added to the LCP through the City's comprehensive update process. This figure should also show existing and planned coastal accessways and public vista points.

D-12

The updated LCP should include descriptions of existing and planned trail segments located within the coastal zone that are detailed in the Trails Master Plan. The LCP update should also include policies that will facilitate implementation of the planned future trail segments and address best management practices to avoid, minimize, and/or mitigate adverse impacts to sensitive habitats and species associated with trail design, construction and operation.

D-13

As noted in the Trails Master Plan, many of the City's existing and planned trails and coastal accessways will be threatened by future sea level rise. Continued public access to coastal resources is a critical component of the Coastal Act and the City's LCP. The comprehensive update should identify appropriate adaptation measures for trail and public accessway design and operation to ensure continued coastal access.

Sincerely,



Erin Prahler
Coastal Program Analyst

cc: Don Neu, City of Carlsbad
David de Cordova, City of Carlsbad
Jennifer Jesser, City of Carlsbad
Deborah Lee, California Coastal Commission
Gabriel Buhr, California Coastal Commission

Letter D – Erin Prahler, Coastal Program Analyst, California Coastal Commission, May 5, 2017

- D-1 The commenter recommends that, rather than incorporate the entire Trails Master Plan into the Local Coastal Program (LCP) at this time, the city integrate key portions of the plan into the comprehensive LCP update process, which is currently underway. The city concurs with the recommended approach to address relevant components of the trails plan into the LCP update.
- D-2 The comment notes that public access is a core principle of the California Coastal Act and key component of the city’s LCP, and that TMP Section 1.5 Local Planning Efforts should be expanded to acknowledge the relevance of coastal policies to trails planning in the coastal zone. This section of the TMP will be revised to include discussion of the city’s LCP as it relates to trails. Also, Table 6 of the IS/MND discusses the TMP’s consistency with applicable policies of the city’s certified LCP.
- D-3 The comment states that the Coastal Commission and city, under its LCP authority, routinely obtain access easements for future trails as conditions of approval for private development in the coastal zone. Section 3.7 of the Trails Master Plan will be revised to clarify current practices with respect to dedication of public access easements in the coastal zone.
- D-4 The comment requests that coastal access points be added to Figures 3.5 and 5.1 to show how existing and planned trails provide connections and access to coastal resources. These figures will be revised as requested.
- D-5 The comment notes that the TMP does not include every trail identified in the LCP, and cited Mello II Policy 7-6 calling for a trail along the southern shore of the Buena Vista Lagoon. In response to this comment, the Trails Master Plan will be revised to include a reference to LCP for detailed public access requirements in coastal zone.

A proposed Buena Vista Lagoon South Shore Trail will be included in the revised TMP consistent with LCP Mello II Policy 7-6. The City of Carlsbad requires all new development of lagoon fronting properties to provide an offer to dedicate (irrevocable for a period of 21 years) a minimum 25-foot wide lateral access way across those properties for a future trail and will continue to require this condition.

- D-6 The comment notes that trails projects within the coastal zone will require a coastal development permit and must be consistent with applicable LCP policies. Section 6.3 Design Considerations will be revised to make it clear that trail development in the coastal zone must be consistent with LCP requirements.
- D-7 The comment recommends that trail development should be evaluated for adverse impacts to sensitive habitat in the coastal zone. Section 6.3 of the TMP does address the need for trail design and construction to consider impacts on natural resources, consider Habitat Management Plan (HMP) requirements and consult with resource agencies as needed. The HMP is a component of the city’s certified LCP; therefore, compliance with HMP policies, standards and best management practices in the design, construction and maintenance of trails in the coastal zone will ensure that environmentally sensitive areas are protected consistent with the LCP. This section of the TMP will be strengthened to make it clear that new trails shall be consistent with applicable provisions of the HMP. Furthermore, for trail projects within or

adjacent to environmentally sensitive areas, mitigation measures BIO-1 through BIO-8, as specified in the IS/MND, will be applied to avoid, minimize or mitigate adverse impacts to sensitive habitats resulting from trail construction and use.

- D-8 The comment notes the importance of adaptation planning for existing and future trails to ensure continued public access of coastal resources in light of sea-level rise forecasts. The city has prepared a Sea Level Rise Vulnerability Assessment which evaluated potential sea level rise impacts to critical facilities and infrastructure, including trails and public access points, and describes a range of potential adaptation strategies that may be applied to respond to future impacts. The vulnerability assessment will be used to inform the development of adaptation policies in the comprehensive LCP update.

- D-9 The comment states that permanent trail closures in the coastal zone would require a coastal development permit to evaluate alternatives and impacts to coastal access. In response to this comment, a reference in Section 7.4 will be added to the Trails Master Plan to alert the reader that permanent trail closures in the coastal zone must be consistent with the city's LCP requirements.

- D-10 Comments D-10 through D-13 provide advice as to which portions of Trails Master Plan should
thru be integrated into the city's comprehensive LCP update, including figures and descriptions of
D-13 existing and planned trails in the coastal zone, policies, and adaptation measures to respond to future sea level rise. The city takes note of these comments and will address them in conjunction with the comprehensive LCP update effort.

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Monday, May 08, 2017 9:31 AM
To: Kasia Trojanowska; Joanne Dramko; Bill Vosti
Subject: FW: City of Carlsbad Trails Master Plan GPA 2017-001/SS 12-06 Comments on MND

-----Original Message-----

From: Terzich, Chris [<mailto:CTerzich@semprautilities.com>]
Sent: Friday, May 05, 2017 3:53 PM
To: Pam Drew <Pam.Drew@carlsbadca.gov>
Subject: City of Carlsbad Trails Master Plan GPA 2017-001/SS 12-06 Comments on MND

E-1 [San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the above-referenced trail master plan MND. It is important to note that SDG&E's access roads are for the sole purposes of operating, maintaining and constructing the region's electric system and any other use is discouraged and not consistent with the intent of the facilities that have been installed to provide safe and reliable power to its customers. Additionally, in general, if SDG&E uses land other than for utility purposes, it needs the California Public Utilities Commission's (CPUC) authorization. To determine whether any proposed trail use of fee owned land may require CPUC authorization, SDG&E requests GIS shape files of the City's existing and proposed trail system so that an investigation can be made. Furthermore, where utility access roads are located as easements on private property, the underlying property owner must also be in agreement with the proposed trail use of their property.

E-2 [

E-3 [

If you have any questions or concerns please contact me at your earliest convenience.

Christopher P. Terzich
SDG&E Environmental Technology and Regulatory Lead
8315 Century Park Ct., MS CP21E
San Diego, CA 92123
(619) 838 8772

Letter E – Christopher P. Terzich, Environmental Technology and Regulatory Lead, San Diego Gas & Electric, May 5, 2017

- E-1 The comment states that the primary purpose of utility roads is operating, maintaining and constructing the region’s electric system. The city understands this position; however, the city sees an opportunity to combine this purpose with enhancing passive recreation, encouraging health and active lifestyle in the community, and protecting of a natural environment. The city would like to coordinate the necessary steps required for SDG&E to allow trail use on selected existing utility easement roads.

- E-2 The comment advises that approval by the California Public Utilities Commission (CPUC) may be necessary if SDG&E-owned land is used for purpose other than utilities. Upon adoption of the Trails Master Plan, the city would proceed with coordinating with SDG&E to obtain necessary authorization from the CPUC. The GIS shape files for existing and proposed trails within utility access roads will be sent to SDG&E for their reference and use.

- E-3 The comment states that where utility access roads are located on private property, the underlying property owner must also be in agreement with proposed trail use of their property. All stakeholders will be invited to collaborate on the final trail alignment once the proposed segment becomes a project.

Note that the comments in this letter do not address the adequacy or accuracy of information provided in the IS/MND.

City of Carlsbad
Pam Drew, Associate Planner

May 5, 2017

Subject: Trail Master Plan and Mitigated Negative Declaration

Dear Ms. Drew:

F-1

Citizens For North County (CNC), a non-profit 501 (c)4 corporation, is submitting these comments on the City of Carlsbad Trails Master Plan (TMP). Next month will mark the one year anniversary of CNC's submission of a citizen-drafted plan to make the long-promised Hub Park a reality. While there is much in this Master Plan we can applaud, the plan fails to seriously reflect the passionate support for creation of trails along the Agua Hedionda Lagoon by Carlsbad citizens – whether supporters or opponents of the Caruso Project. After spending hundreds of thousands of taxpayer dollars in an election on which these trails were a key focus, the city in the TMP misses an opportunity to heal the community while working together to create this park and lay the cornerstone for a trail system that truly links Carlsbad's neighborhoods – not to mention taking a giant step forward in making our trail system a functional and efficient element of our city's circulation plan.

F-2

The TMP needs to prioritize the trail proposal for the South Shore of the Agua Hedionda Lagoon (SSAHL) (7C). It is clear from the lease arrangement held by the city that action on this development can begin at the city's discretion. As written, the TMP dilutes the role of this trail area in the community's entire circulation strategy to the point that it appears irrelevant instead of critical to achieving the benefits of mobility, recreational opportunities, and preservation of our open spaces.

F-3

While citizens proposed a budget of \$430,000 to create this centerpiece for our trail system, there is no cogent explanation here as to where the citizens' proposal is shortsighted either in scope or cost estimate. As the proposal's pathways were reflective of the Caruso diagram – already run by state environmental officials – there should be no lack of clarity as to state expectations. The opportunity to incorporate the Discovery Center's existing programs and indeed to expand them with improved access to the South Shore area is long overdue.

F-4

There are characteristics of this project that would improve the efficiency of linked trails and improve management of pedestrian and wheeled interaction on the trails – an objective emphasized in this report in illustrations of the six trail types (Figure 3a,3b,3c,3d.). There are insufficient vehicle parking strategies at locations throughout the TMP, including SSAHL. Further, there is an over reliance on roadside sidewalks for significant stretches for the SSAHL proposal -- as well as locations throughout the community – a strategy that increases exposure to pollution instead of decreasing it.

F-5

There are two categories where biological resources and their impacts on the proposed SSAHL park require additional specificity. First, the management of agricultural contamination. This is particularly important for the SSAHL with its proximity to the strawberry fields, as well as trails planned along SDG&E access roads. Secondly, the focus on the removal of invasive species is to be applauded, but as

F-5
cont.

we have learned in other locations, refinement of standards is needed. Again, there are two problems here: failure to provide transition resources for the wildlife that has adapted to the invasive species so that their role in the ecological community is not lost because of the removal of the invasive plants; and use of toxins to kill plants and then failure to remove the poisoned soil and vegetation.

F-6

Further, the definition of scenic vistas (p. 16) is inaccurate – as exemplified by the viewpoints along the Agua Hedionda Lagoon. Yes, there are cherished views of the ocean, but there are equally significant views of the lagoon to the east. These vistas should not be overlooked.

F-7

Finally, while the presence of a large number of Home Owner Association controlled parks is referenced (p. 11), the pressures on these parks, trails and neighborhoods to deal with increasing numbers of visitors, confusion about what is allowed or not allowed on this patchwork of public and private trails, and insufficient parking for access are not addressed. Damage to the natural resources in these areas – largely due to lack of supervision and a lack of standards for resource management – are significant issues in our community.

F-8

These issues are represented in the SSAHL location but they are found throughout the city, and resolving the solutions at this site will benefit the entire Trail Plan.

Respectfully,

De'Ann Weimer

President, Citizens For North County

858-344-0436

Letter F – De’Ann Weimer, President, Citizens for North County, May 5, 2017

- F-1 This introductory paragraph states that the TMP fails to seriously reflect the passionate support for creation of trails along the south shore of the Agua Hedionda Lagoon (SSAHL). The TMP proposes a Type 2 Recreational Trail on the SSAHL (Segment 7C). It will begin at the future I-5 bridge (proposed as part of the Caltrans widening project). The trail alignment is proposed to traverse along the upper bluff, on the lagoon’s south shore, and terminate at the Cannon Road underpass. Specific trail alignment is diagrammatic and will be refined and verified in the project development phase. Part of the proposed segment loops within the Hub Park lease area. The loop within the Hub Park area can potentially be developed by the city, but it requires a public access easement granted by SDG&E to allow public access to the trail. Currently, Hub Park has no egress/ingress within city-managed land to allow for connectivity. Therefore, trail development for egress/ingress would need to occur in conjunction with a private development and/or through a collaborative effort with adjacent property owners.
- F-2 The comment requests that trail segment 7C be prioritized for construction. Trail development is an opportunistic and flexible process. Prioritization for development of trail segments is based on several criteria, including: conditions of approval for private development, transportation initiatives of governments, availability of local and regional funding for public projects, and construction by city staff and volunteers. As mentioned in response F-1, part of the trail within the Hub Park area could be potentially developed by the city as a Capital Improvement Project, but access to the loop would need to be secured first from SDG&E. A private development project could be conditioned to construct a portion of the trail outside of the Hub Park area which would provide egress/ingress to future trails within Hub Park.
- F-3 The comment states that the TMP does not explain why the citizens proposed trail budget estimate of \$430,000 is inadequate. Proposed trail segment 7C will undergo project level environmental (CEQA) review in conjunction with the development phase to determine the final alignment of the trail. Factors such as: ownership of the land, cultural resources, vegetation, topography, and preserve/habitat status will be taken under consideration in the delineation of the trail. Connectivity to the Discovery Center through open space is constrained by: 1) steep terrain between the Hub Park area and the Discovery Center; 2) riparian habitats; 3) delineation of the hardline Habitat Management Plan (HMP) preserve; and 4) ownership rights. The budget of \$430,000 may be adequate for construction of the trail, but it does not provide sufficient funds for permitting, environmental review, and impact mitigation for the project. A capital improvement project for the Hub Park Trail would need to be approved by City Council prior to moving forward with the planning phase.
- F-4 The comment states that vehicle parking strategies in the TMP are insufficient and that the plan overemphasizes roadside sidewalks. An objective of the TMP is to close existing gaps in the trails system and distribute trails to serve all subareas of Carlsbad with close, convenient access to residential centers, tourist facilities, and other activity centers. Use of roadside sidewalks would facilitate access from neighborhoods and hotels, and enhance biking and walking opportunities. By bringing more and better connected trails into proximity to residential and activity centers, the demand for additional parking should be lessened. Where parking is determined to be essential, then restriping or reconfiguring nearby roads would be preferred to adding any new parking lots. Shared parking arrangements may also be possible where nearby businesses would benefit from increased use by trail users. Parks & Recreation staff collaborate with the

Transportation and Planning Divisions who lead citywide parking/circulation studies to develop innovative strategies to solve these issues. Please also see response F-3.

- F-5 The comment mentions two categories where biological resources and the proposed SSAHL park (trail 7C) require additional specificity; the issue of agricultural contamination and the removal of invasive species. As noted in Section II (a-c) of the IS/MND, some trails, including trail 7C, would be along active agricultural lands. For these trails, fencing and signage would be provided to separate the uses so that trail users would not interfere with existing agricultural operations or trespass onto adjacent agricultural lands and to ensure that agricultural operations do not encroach onto the trail. Further measures may be incorporated as appropriate at the project-specific level.

Regarding the potential effect that removal of invasive species would have on wildlife that have adapted to those species, there are several important points to clarify for the commenter. First, any wildlife that have adapted to invasive species in such a way that they would be adversely affected by the removal of invasive species are not likely to be sensitive wildlife species. The city is not aware of any sensitive wildlife species that would be adversely affected by invasive species removal. Conversely, the city is very aware of the potential adverse effects that non-native and invasive plant species can have on sensitive wildlife if they are not treated and removed. The CEQA significance thresholds for biological resources do not require analysis of potential effects on common, non-sensitive wildlife with respect to removal of invasive species. If and where required, the removal of invasive species for the Trails Master Plan would occur at specific, concentrated locations that are expected to be very limited in size and primarily situated at the trail margins, whereby the removal actions would not result in a functional loss of the surrounding or adjacent habitat. Wildlife of all species would be expected to relocate and select the excluded habitat surrounding the spot treatment areas for their basic life history needs. Consequently, there would be no loss in ecological roles or processes and conditions are expected to be enhanced.

Implementation of mitigation measure BIO-7 would require coordination with the HMP preserve manager to determine the specific actions and responsibilities for treatment and removal and would ensure that no adverse effects would occur to protected species as the treated areas are transitioned to native habitat. Further, BIO-7 requires qualitative assessment and repeat treatment activities non-native plant species coverage exceeds 10 percent. The intent of treatment and removal activities is to prevent continued propagation and spread of non-native plant species and encourage native plant species recruitment and recolonizing of the area. Lastly, mitigation measure BIO-7 requires that the city implement the least toxic method to remove invasive plants, which would be expected to include treatment types appropriate for use in sensitive habitat areas that do not leave residual toxins in the soil and vegetation. At the direction of the Preserve Manager, invasive plants would be treated and left in place or removed and disposed of at an approved off-site location.

- F-6 The comment states that the definition of a scenic vista should include significant views of the lagoons. In response to this comment, the definition of scenic vistas has been revised in the IS/MND on page 16 to state the inclusion of the views to and from the lagoons, as shown below (see underline for additions):

Scenic vistas within the city primarily consist of scenic corridors and views to and from the coastlines and the lagoons.

This revision would not alter the conclusions or analysis in the IS/MND regarding scenic vistas.

F-7 In reference to the IS/MND discussion of privately-owned and maintained parks, the comment states that the lack of city standards for resource management are significant issues for residential communities where high trail use occurs. As noted on page 11 of the IS/MND, many of the smaller parks that are within the city are located within residential developments and are maintained by Home Owners Associations (HOAs). These parks are reserved for the residents of the development and would not be accessible by outside users. Signs would be posted on trails outlining allowed uses (see Section 6.14 of the Trails Master Plan for signage guidelines and standards and Figure 7-1 of the Trails Master Plan for an example sign). Public trail users would not be permitted to use privately owned lots for parking.

The project includes several measures to protect biological resources within sensitive habitat, as discussed in the Trails Master Plan and Section IV of the IS/MND. Habitat degradation from use and maintenance, negative impacts to surrounding sensitive resources, and areas of high resource conservation have been accounted for in the IS/MND. For example, fencing on the trails will be provided in certain areas. Signage would also be provided to remind users to stay on the trail.

Under Section 7.4 of the Trails Master Plan, seasonal trail closures are mentioned as being potentially necessary to avoid or minimize impacts to sensitive habitat and wildlife, and the Wildlife Agencies are listed to be consulted with during the trail development process. Permanent trail closures may also occur for trail segments that adversely impact sensitive environmental resources. In addition, where impacts would be potentially significant, mitigation measures BIO-1 through BIO-8 have been identified to reduce impacts to less than significant.

Regarding enforcement, observance of violations would be reported to the Carlsbad Police Department. A General Enforcement Authorization Agreement allows the Carlsbad Police Department and any other law enforcement agency to enforce any federal, state or local laws on the private properties that are part of the open space HMP. In addition, on May 16, 2017, the Carlsbad City Council approved a resolution to establish a pilot program establishing two full-time ranger positions with citation authority dedicated to monitoring the city's open space and trails. The Ranger Program is now permanent and funded fully by the City of Carlsbad. Last, many of the trails traverse existing trails within existing HMP Preserve areas that already have area-specific management directives for monitoring, enforcement, and restoration. The city's HMP Program Manager and individual preserve managers coordinate closely with various city departments to ensure preserve lands in the city are being managed consistent with the HMP. Fencing, signage, and other efforts to formalize existing trails that have been in place and use for many years will be a benefit to the HMP preserve areas.

F-8 The comment notes that the issues brought up in the letter regarding the SSAHL location would also apply to other trails. Please see responses F-1 through F-7.



May 4, 2017

Pam Drew, Associate Planner
Sent via Email

Subject: Comments on Trails Master Plan and MND

Dear Ms. Drew:

These comments on the Trails Master Plan (TMP) are submitted on behalf of Preserve Calavera. Our mission is to preserve, protect and enhance the natural resources of coastal north county. We support that mission through community education efforts like hikes as well as hands on projects like trail repairs, wildlife movement studies and native habitat restoration. Providing public trails that increase access to our priceless natural lands is the first step toward getting people engaged in their protection. To that end, we have a long history of supporting public trails and the associated need for on-going education programs, monitoring and enforcement.

We commend the city for getting many things right with the Trails Master Plan. We tried unsuccessfully to get both Oceanside and Vista to include consideration of circulation system improvements as part of their trails planning. Carlsbad has made this a key consideration and the result is several new connections that really will help people make the choice to walk or bike instead of getting in their cars. Carlsbad has also clearly distinguished types of trails and provided additional protection for those in our natural lands where there are concerns about protecting our native plants, wildlife, and wetlands. And Carlsbad has a long history of involving the community in trails maintenance, monitoring and enforcement which is further strengthened through provisions in the TMP.

In our review of the TMP and associated MND there are still a number of issues to be resolved that will ensure the TMP meets the City's objectives while still fully protecting our natural resources and supporting broader efforts to reduce GHG. The following are several specific issues of concern with each of these documents.

MND

Air Quality

- Impact of number of new trail heads with parking added

The number of new trail heads with parking has been reduced from the previous draft. However, the TMP still includes many new trail heads that are designed in a way that could increase car travel by adding recreational trips to drive to a trail head. Adding parking encourages more auto trips. This is not consistent with General Plan (GP) policies related to changing the travel mode split in order to both reduce air quality impacts and as a key way

G-1

G-2

5020 Nighthawk Way – Oceanside, CA 92056
www.preservecalavera.org

G-2
cont. to reduce greenhouse gasses(GHG). The goal is to use alternative transportation instead of driving- not to drive first and then use alternative transportation. The EIR for the GP found significant unmitigated adverse impacts for Air Quality and Traffic so any incentive to increase auto use will add to these cumulative adverse impacts. The MND has not adequately considered these potential cumulative impacts.

- Impacts of trails adjacent to freeways

G-3 Studies have now documented the adverse health impacts, particularly on children and the elderly, of the pollutants from car exhaust. This is of particular concern adjacent to freeways. In recognition of these impacts many places restrict school playgrounds adjacent to freeways. The city of LA also restricts parks from within 500 ft. of a freeway. Trail segment 7F is immediately adjacent to I-5. We understand this trail segment was part of the I-5 widening Caltrans project- but that doesn't mean it makes sense, or has been adequately evaluated.

Biological Resources

- BIO-7 Non-native Invasive Inspection and Removal

G-4 The way this is written does not fully support the use of the least toxic method- which is to use no chemical methods of control. Often hand weeding is the best method along linear elements like a trail. Other non-chemical means that should routinely be considered include things like mowing before seeds are set. The city of Irvine has been a leader in reducing the use of chemicals and moving toward becoming a toxic-free city. This language should be clarified so it does not sound like only the least toxic chemical will be used, but the first priority is to not use chemicals at all.

- - BIO 8 d Wildlife Movement Corridors

G-5 In 2015, the city completed a study of wildlife movement corridors and pinch points documented in City of Carlsbad Wildlife Movement Analysis Final Report. The MND states that the trails "are not anticipated to impede wildlife movement as they are paved and unpaved paths with minimal or no surface structures" and that "wildlife would be expected to move unobstructed through and around trails that might intersect wildlife movement." However, the referenced study, previous wildlife movement studies in Carlsbad, and the biological analyses of the impacts of trails from the MHCP all document numerous potential impacts of trails on wildlife movement. The MHCP has guidelines for limiting impacts. For example, that pinch points in a wildlife movement corridor should not be more than 400' long and should maintain a minimum width of 500'. The TMP proposes several trails within what is an already constrained wildlife corridor pinch point (See 9 F for example).

G-6 Numerous studies have documented the impacts dogs on trails have on wildlife. For example, the mule deer disturbance is documented as 100m on each side of a trail. (See references below).. Trails near pinch points are especially problematic in this regard. Even coyotes and bobcats are effected. Dogs tend to mark when out on a trail and that is a signal to every critter that a predator is present. Multiply that use over time and cumulative impacts are significant.

G-6
cont.

We actually have witnessed those effects at the Lake Calavera Preserve over the past 15 years. We see potential conflicts with wildlife corridor pinch points and new trail segments at Veterans Park 8D, Sunny Creek 9A, Carlsbad Raceway 9F and 10D

G-7

The section of Tamarack east of El Camino Real is already a known wildlife roadkill problem area. Adding the trail head connection would create an opening in the existing chain link fence on the north side of Tamarack which is a good thing. However, design of fence and the location of the opening needs to be done in a way that improves wildlife movement while also allowing improved public access.

G-8

While there are several areas where the proposed trail design could adversely impact wildlife movement, better mitigation could likely minimize/eliminate most of these impacts. A critical one that has not been called out in the mitigation measures is increased monitoring and enforcement.

G-9

The MND needs further evaluation of the impacts of wildlife movement, and should include appropriate reference documents like the pinch point study and the sources mentioned below. We believe that with further analysis and better mitigation that most of the proposed trail segments could be done in a way that does not cause impacts to wildlife movement.

- BIO 8e Conflict with local policies

G-10

The MND references HMP F.2.B. which makes it clear that the first priority is “protection of plant and wildlife species” and establishes guidelines for any new recreational expansion into preserved lands. It includes several provisions specific to mountain bike use and conditions for any public access that include to seasonally restrict access to certain trails if deemed necessary to prevent disturbance of breeding activities, close unnecessary trails, and establish patrols to identify trail maintenance needs, garbage, vandalism and habitat degradation. While this language sounds good, and has been in place since the HMP was adopted in 2004, it in fact has not been followed to a level that assures protection of the biological resources. In fact, we are not aware of any instance where trails were closed to protect the biological resources, in spite of numerous reports of conflicts like illegal trail building.

G-11

Also we see no restriction on users (like mountain bikers) on any of the trails- particularly Type 1 Nature Trails which can be as narrow as 4'. Please clarify if it is intended that 100% of the trails are for multi-use- including bicycles and if so provide further analysis that shows all of the trails meet the HMP criteria for new mountain bike trails. If there are trails that will be restricted then this needs to be specified with appropriate monitoring and enforcement.

Land Use

- Conflicts with General Plan policies

G-12

Table 5 lists several policies of the General Plan to demonstrate consistency. But it fails to note two specific items where the TMP is not consistent – General Plan 3-P.21 which specifies trail connections from the eastern termini of both Marron Rd and Cannon Rd to the east. These two

G-12
cont.

connections are called out on notes on Figure 4 Existing and Proposed Trails. But the MND has failed to identify this inconsistency and evaluate the impacts. Both of these connections were identified as important circulation element connections to help mitigate for the impacts of removing the road connections at these two locations. This trail connection was assumed as part of the Air Quality and GHG impacts of the GP. Failure to implement these alternative transportation links will contribute to the cumulative impacts and this impact has not been evaluated.

G-13

Furthermore, the link through the Buena Vista Creek Valley was included as part of a settlement agreement condition the city of Carlsbad signed over the Quarry Creek project. Failure to comply with this legal obligation is a further conflict that should have been called out in the MND. We included this trail link in the settlement agreement because of the significant impacts of ignoring the damage that unplanned public use is causing in this valley. Simply saying there is not a trail does nothing to address these impacts. Conditions have already gotten worse in the last few months- and only a few of the 636 housing units planned for the valley are constructed. When all are completed it will become impossible to protect the adjacent Buena Vista Creek Ecological Reserve from hundreds of nearby residents and dogs- with no increase in patrols or enforcement. We fully understand the complications with achieving this and the reluctance of the DFW to allow this trail connection. We are committed to continue to support the city's efforts to achieve these trail connections. However, the CEQA process does not allow the city to ignore these conflicts in their MND.

G-14

Greenhouse Gasses

G-15

The City's Climate Action Plan(CAP) is mitigation for the cumulative impacts of GHG from the GP. The CAP states that implementation of the policies in the GP assure that the GHG reduction target for 2020 is met. Consequently, failure to implement those policies will result in GHG that exceed the threshold and will result in significant adverse impacts. There are two trail segments that were not included in the environmental analysis for the TMP but are shown with dotted lines and a notation that "...the city supports completing the trail in accordance with the Carlsbad General Plan Mobility Element." These two trail segments are specifically called out in GP policy P-3.21 because both provide needed alternative transportation links where road connections included in the prior GP were eliminated in the new one. These two trail segments provide links where the roadway is already highly congested and where the new GP allows traffic conditions to fail rather than adding more traffic lanes (El Camino Real and College Blvd. Failure to include these two trail links in the MND violates conditions in the CAP, and the associated EIR for the GP. It results in a significant unmitigated impact. Furthermore, the statement that the city supports these two trail segments implies there is an intent to move forward with them in the future. If so, then not including them in this MND is piecemealing the analysis of the potential environmental impacts of the entire TMP.

G-16

Trails Master Plan

Chapter 1 Introduction

G-17 - The Pedestrian Master Plan from 2008 had not included Sage Creek High School. This plan needs to at least have the Safe Routes to School elements updated to add the new high school. This school generates a huge number of trips and being able to move more of these to alternative transportation will be increasingly important as there are more students of driving age attending the school. Safe crossing of the roads at the intersections of College and Cannon should be addressed now, and again later as part of the design for the extension of College. General Plan policy 3.P.27 is to implement Safe Routes to School-. The first step is to include the new high school in the pedestrian plan.

G-18 -Figure 1.2 Composite of Regional Trail Projects is not consistent with other figures showing the regional bike connections (see Figure 3.4). - This shows the North Coast Bike Trail jogging back and forth from Coast Highway to the freeway, providing duplicate bike connections to the City's coastal rail trail. It is hard to imagine that having two very expensive parallel routes is a good investment of taxpayer dollars, and would result in any real enhancement of bicycle route connectivity. Consideration should be given to consolidating this to a single route- and 7G makes a lot more sense than 7F.

Chapter 2 Planning Efforts

G-19 -Page 2-5 says the appendices document all of the public comments received but no such appendix was included and it is not noted on the Table of Contents.

Chapter 4 Trail Network

G-20 -There needs to be a connection added for pedestrians from the west end of 1B to Jefferson St and the trails at Hosp Grove. There is no pedestrian access along that section of Jefferson.

G-21 -Proposed segments 1B and 1C are key segments in what we hope will become not just the Waterfall to the Waves Trail- but will provide regional connectivity from east of Brengle Terrace Park through Vista and Oceanside up to the El Salto Falls, and from there through Carlsbad to the coastal rail trails. It would help energize support and resources to identify this as a major regional connection similar to what has been done with the Coastal Rail Trail.

G-22 -Figure 4.2 has in error labeled the lagoon as the Vista Creek Ecological Reserve.

G-23 Subarea 2 has an existing cul-de sac with angle in parking on Haymar near the entrance to the existing sewer access road which is becoming I C. Since Haymar will not go through this is likely to become trail parking, A new trail head with parking is proposed at El Salto Falls St, a few hundred feet from this existing parking area. It seems like the existing cul-de-sac should be integrated into the planning for this location.

G-24 -The map of Subarea 2 (and others) fail to show many of the trails within the development foot print for the Quarry Creek project that were part of the adopted EIR. Those trails provide the public view of the sacred El Salto Falls and connection to the trail shown as a row of dots through BV CER. It also fails to show trail heads with parking that were approved on each end of the dotted line trail. If the trail segment is shown then the planned trail heads should also be

G-24
cont.

shown. We understand the concerns by the Wildlife agencies about the trails through the BV CER. However, ignoring the impacts of public use of this area is not protecting the resources. The roads to the development and housing are under construction. Link 2B connecting Simsbury CT is scheduled for 2017. Our settlement agreement requires the two trail heads to be built. The land manager is already experiencing increasing, problematic public use of the BV CER. Ignoring this will just make it worse- and result in more damage to the cultural, historic and natural resources of this valley.

G-25

- To our knowledge, Agua Hedionda Lagoon is the only area in the community where local residents spent a great deal of time and effort proposing a very detailed plan for trails. This area was the focus of a lot of community concern with the proposed Caruso development. The community's plan for trails provided much better connectivity to the AHL Discovery Center and overall greater recreational opportunity than what is proposed in the TMP. Hub Park and the trails proposed in the future park and along the lagoon could provide unique opportunities for recreation that incorporates the lagoon and historic use of this site, as well as the educational opportunities from connection to the Discovery Center. The TMP should provide a more thorough justification for what is proposed and why this is preferred over the community's vision for trails in this area.

Chapter 5 Trail Development

G-26

IB and 1C Haymar - see comments on Chapter 4 about Waterfall to Waves

G-27

2A and 2B Hidden Canyon Park and Quarry Creek. Both of these segments are adding public use into the BV Valley- with no plan for how to really address the increased conflicts this will cause. Until there really is a plan to address this we are concerned about adding these two trail segments. Their timing needs to be contingent upon having an approved plan between the key stakeholders- one that includes adequate resources to monitor and enforce the issues that will result from further increases in public use.

G-28

5B Village H South - - This should be divided into two segments. The first is the existing public use trail from Victoria west that has a loop at the western end. Per settlement agreement over the Quarry Creek project the transfer of this land to the city is expected to occur within the next few months. The agreement specifies that opening of the historic trail to public use is to occur "promptly" after the land transfer. The schedule says this trail segment will not be done until 2025, -not "prompt" even by government standards. This section really requires minimal changes and signage to open and should be scheduled to occur "promptly". The full connection to Tamarack on the western end traverses a steep slope and will be more complicated and costly. Planning for this extension also needs to consider wildlife movement through this area.

G-29

7A, 7F and 7G - Three expensive parallel routes with scheduled dates of 2025, 2020 and 2020 respectively, each with price tags in the millions does not seem like the best use of public resources. Given that the Village/Barrio is the only existing Smart Growth site in the city and will include extensive efforts to increase the use of alternative transportation why not focus on 7A and 7G, move those to 2020 and reallocate the funds from 7F where they would provide greater public benefit- such as to the 7C trails in Hub Park and along the lagoon.

- G-30 7C South Shore AH Lagoon -- This trail should be phased, with some immediate public benefit on the Hub Park site. The text notes that the section along the commercial property will be a condition of its development- the timing of that section should note that.
- G-31 7D and 7E Park Dr. and Hallmark -- north shore of AH Lagoon. The shorter, less expensive segment 7E is delayed until 2025 while the longer more expensive one is scheduled for 2018. 7E provides a real benefit – people can already walk along Park Dr. so that is just enhancing an existing connection. It seems like 7E should be done first.
- G-32 8A and 8B- Coastal Corridor Cannon Rd to PAR. These again are two very expensive parallel segments. It appears that 8A will really benefit the increased development proposed in that area. If it can be demonstrated that these two parallel routes will result in a mode shift toward alternative transportation then they may both be justified. But new development needs to be conditioned to pay its fair share of these costs.
- G-33 9E – Cantarini Open Space Trails – We understand this maze of trails was included in the 2002 EIR for this project. But it is our understanding that after several delays it is expected this project will be modified prior to any actual construction. Since the dotted line trail that runs parallel to this through the Calavera Highlands Reserve is still problematic this may end up being the primary connection from the utility road 9D to the future College extension. It would make sense to reconsider this alignment to provide a more direct connection that might eliminate the need for the connection the WLAs do not want.
- G-34 -9F Carlsbad Raceway Park- In 2002 when the Raceway EIR was approved the wildlife undercrossings at Lionshead and Melrose had not been finalized and the wildlife corridor pinch point study had not been done. We now know more about wildlife movement in this area. The map notes the connections to Vista and San Marcos trails, but fails to note it is also a key link in the regional wildlife movement corridor - and it is already highly constrained. Any nature trail through this corridor needs to be preceded by thorough study of impacts on wildlife movement and appropriate levels of monitoring and enforcement. There is a real possibility that fencing will be needed on both sides of Melrose by the tunnel in order to direct wildlife to the tunnel and avoid crossing on the road. If the new trail segment is added it might become a dead end. Designing an opening to accommodate the trail, while also preventing wildlife access to the road is problematic. Or the trail could be directed to the wildlife tunnel- another reason to coordinate the trail plan with wildlife movement.
- G-35 The endowment for existing hardline reserves like this has already been determined so providing increased funding to monitor this trail likely will not come from development.
- G-36 -9G and 12A – Cost must be for entire road- not just the trail. Shouldn't this just include the trails portion of the costs?
- G-37 - 10A and 10B – Two more expensive parallel routes. The analyses for these needs to evaluate whether the benefits of funding these two expensive parallel routes offset the costs, and if there are alternative ways to enhance the beach connection- with other funding partners.

G-38 -10 D – SDG & E Utility Road – Please consider options to extend this segment to the community park which would enhance CATS.

G-39 -The text for Table. 5-2 says it is organized by year, but it isn't. It would be helpful to actually see a table that summarizes improvements and costs by year.

Chapter 6 Trail Standards

G-40 -The HMP provides some specific guidelines regarding new trails for mountain bikes. We did not find any discussion that verifies that all of these conditions have been met for every trail. The description for Type 1 nature trails implies they might not allow bicycles but this is not explicit. If that is the intent then it needs to be very clear. There would need to be specific provisions in signage and enforcement that will support this.

G-41 - Fencing design needs to assure compatibility for wildlife. The Appendix details for wood rail and three strand wire should consider minimum height above ground for bottom rail/wire. And notation that plastic mesh that often is used around straw wattle needs to be removed so it does not become a problem for herps.

G-42 -Bridge/tunnel design has not adequately considered wildlife movement. These structures can really enhance wildlife movement since trail use occurs primarily during daylight hours and wildlife movement often occurs at night. Some of the items specified would be a deterrent to wildlife movement- like lighting in tunnels. Some things to consider: drainage, access at tunnel ends (needs to not have steps that are barriers to little critters) preference for good natural lighting during day, and restrictions on night lighting if in a natural area, consideration of openness ratio (height x width/length) etc.

G-43 -Provisions for public art were added to this draft of the TMP (thank you) but it is unclear how this can be accommodated and still comply with the very rigorous design guidelines for signs and other amenities. Part of creating a sense of place is having a uniform theme for a particular area. We could see special signage and amenity design along the lagoons and through the BV Valley particularly. Perhaps a statement indicating that modifications to design standards can be considered as part of a plan to enhance the public amenities would provide the needed flexibility to consider this on a case by case basis.

Chapter 7 Trail Operations

G-44 -Given the experience of implementing the Lake Calavera Master Trail Plan over the last few years we think it is important to add a more robust discussion of efforts to block off and eliminate numerous other existing unauthorized trails through natural areas while new ones are being added. This is an ongoing concern at the Lake Calavera Preserve-even where there is regular ranger and volunteer patrols. This continues to be a major concern at the adjacent Calavera Highlands Ecological Reserve where we have documented the building of illegal trails over several years.

G-45 -Dogs are only allowed on-leash on city trails. We support this policy and recognize that enforcing this will be a challenge with several proposed trails where the public is used to allowing dogs off leash. This behavior has been corrected in other reserves- but it took a lot of time and effort to do so. These challenges also need to be planned for.

G-46 -7.4 section on Trail Closures does not include discussion of closures to protect the natural resources. Some of this is identified in the HMP (like nesting birds) or need to rest a trail getting heavy bike use. Please add the need for potential trail closures to protect the natural resources- with emphasis that trails in natural areas are a privilege not a right and that compliance with trail rules is critical.

G-47 -Add statements about skateboarding and drones and what effort will be taken to enforce restrictions on these activities.

Chapter 8 Funding

G-48 -There is also the potential for local NGOs (like us) to support trails- and don't forget the language PBS always uses- "and from viewers like you ". Trails outside Sedona AZ now have signs with an App so users can make donations to support trail maintenance from their cell phone. Trail users form the core of the city's trail volunteer program and may also provide community fundraising support.

Sincerely,

Diane Nygaard, President
Preserve Calavera
760-724-3887

References

**Ecological Applications, 13(4), 2003, pp. 951–963 q 2003 by the Ecological Society of America
WILDLIFE RESPONSES TO RECREATION AND ASSOCIATED VISITOR PERCEPTIONS
AUDREY R. TAYLOR¹ AND RICHARD L. KNIGHT²
1Department of Fishery and Wildlife Biology, Colorado State University, Fort Collins, Colorado
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Outdoor recreation has the potential to disturb wildlife, resulting in energetic costs, impacts to animals' behavior and fitness, and avoidance of otherwise suitable habitat.

Mule deer exhibited a 70% probability of flushing from on-trail recreationists within 100 m from trails. Mule deer showed a 96% probability of flushing within 100 m of recreationists located off trails; their probability of flushing did not drop to 70% until perpendicular distance reached 390 m.

BLM Appendix E

Background and Reference Material on Dog-Related Considerations Adapted/Modified From Golden Gate National Recreation Area

Draft Dog Management Plan and Draft Environmental Impact Statement (2013)

Studies have shown that people with dogs disturb wildlife more than people alone (Yalden and Yalden 1990, 248-249) and that dogs may pose a different kind of threat compared to a pedestrian (Miller et al. 2001, 130). Studies have also suggested that dogs, particularly while off leash, increase the radius of human recreational influence or disturbance beyond what it would be in the absence of dogs (Banks and Bryant 2007, 2; Sime 1999, 8.4; Miller et al. 2001, 125; Lafferty 2001b, 318).

Animals most often affected by disturbance from dogs include deer, small mammals, and birds (Denny 1974), although larger mammals such as bobcats and coyotes can also be affected by disturbance (George and Crooks 2006, 14-15).

Recreational trails with abundant dog scent could appear to carnivores to be linear dog territories, necessitating increased vigilance and activity (Lenth et al. 2008, 219). In a study conducted by George and Crooks (2006, 14-15), coyotes specifically showed a trend of temporal displacement in response to dogs, and bobcats were also affected by the presence of dogs.

In conclusion, dogs behave as carnivores (Lenth et al. 2008, 218) and could affect wildlife such as small mammals through chasing and occasionally capturing individuals as well as digging and collapsing burrows. Dogs have the potential to encounter larger mammals such as deer, bobcats, or coyotes and may either displace these larger mammals from high quality habitat that is degraded by the presence of dogs (George and Crooks 2006, 14-15) or cause increased vigilance or activity (Lenth et al. 2008, 219).

Letter G – Diane Nygaard, President, Preserve Calavera, May 5, 2017

- G-1 This is an introduction to the letter; responses to specific concerns are below.
- G-2 The comment states that the TMP includes trail heads that are designed in a way that encourages additional car travel. Most of the proposed trails included in the Trails Master Plan do not propose trailhead parking. Trail parking is included at select trails and would allow access to those who would otherwise be unable to access the trail, such as those not within walking or biking distance, the elderly, those with small children, or those who are physically handicapped (e.g., parking and restrooms at these trails will comply with Architectural Barriers Act [ABA] accessibility standards).

The Trails Master Plan emphasizes multimodal transit by making bicycle and pedestrian travel more accessible. Although in some cases there may be an increase in vehicle trips from those accessing the new trails with parking, there would also be a decrease in trips from those choosing to ride bicycles or walk using the new trail connections. In other cases, implementation of the trails plan will better connect residents to activity centers, thus reducing demand for additional parking. The potential increase in vehicle trips would be minor compared to the overall trips in the city, and would not create a cumulatively considerable increase to air quality emissions or traffic impacts. Encouraging non-vehicle use is consistent with the City of Carlsbad General Plan policies, as well as regional plans proposed by SANDAG, that support alternative transportation to reduce GHG emissions. Therefore, the conclusions found in the IS/MND for air quality, GHGs, and traffic would remain less than significant.

- G-3 The comment raises health-related concerns over locating trails near freeways, trail segment 7F in particular. The California Air Resources Board provides recommendations on siting new sensitive land uses (such as schools and residences) near sources of air pollution, such as freeways. The assessment of potential health risks focuses on long term exposure (typically 70 years) to a pollutant. As discussed in Section III.d of the IS/MND, users of trails near roadways (such as trail 7F) may be exposed to toxic air contaminants from passing vehicles; however, exposure of trail users to these pollutants would be intermittent and short-term. Therefore, the conclusions found in the IS/MND for air quality would remain less than significant. Further, as noted in the IS/MND, trail segment 7F was included as part of the certified I-5 North Coast Corridor Project EIR/EIS (SCH# 200401076) and is not required to be re-evaluated.
- G-4 The comment states that mitigation measure BIO-7 should be clarified that the least toxic method to removing non-native, invasive vegetation includes not using any chemicals at all. The city concurs with this comment, and in response, mitigation measure BIO-7 has been revised to emphasize chemical-free methods of non-native invasive species removal (see underline for additions and ~~strikethrough~~ for deletions):

BIO-7: Non-Native Invasive Inspection and Removal. As part of the city’s routine maintenance inspections and where trails occur within or immediately adjacent to HMP Preserve areas, the city shall inspect trail edges for sign of non-native invasive plant species listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council (Cal-IPC 2006). If non-native invasive plant species are confirmed present within these areas, the city shall coordinate with the HMP preserve manager to determine the specific actions and responsibilities for treatment and removal. The specific actions and responsibilities

will be performed in accordance with long-term management directives and requirements prescribed for the affected HMP Preserve area. Where such directives and requirements have not been prescribed and cannot be provided by the HMP preserve manager, they shall include the following, at a minimum:

- a. The least toxic method that effectively removes the weeds shall be used. The preferred method would not use chemicals. This can be accomplished through hand weeding along the linear elements of the trail. Other non-chemical means includes mowing before seeds are set.
- b. If herbicides must be used for non-native invasive removal, at the direction of the Preserve Manager, invasive plants shall be treated with herbicides and left in place or removed and disposed of at an approved off-site location, such as the Waste Management facility at 5960 Reef Circle, Carlsbad, California. This would be performed in accordance with the city's Integrated Pest Management (IPM) plan, updated in November 2017. The updated plan emphasizes the initial use of organic pesticides, limiting the use of chemical pesticides where the general public congregate, and when pests cannot be managed by other methods, using USEPA-level pesticides in a targeted manner and only if deemed necessary to protect public safety or economic loss.
- ~~c. The least toxic method that effectively removes the weeds shall be used.~~
- d. Herbicides may only be applied by a licensed pesticide applicator under the supervision of the HMP preserve manager or qualified biologist retained by the city.
- e. A qualitative assessment of non-native plant species coverage shall be completed by the HMP preserve manager or qualified biologist retained by the city at the end of the year during which the treatment activities took place.
- f. Living, non-native plant species coverage at the location of the treatment area must be demonstrated not to exceed 10 percent of the total treatment area.
- g. If coverage exceeds 10 percent, then at the direction of the HMP preserve manager, the treatment activities shall be repeated the following year.

G-5 The comment raises concerns about trail impacts on wildlife movement corridors. The components proposed within the Trails Master Plan do not represent physical impediments to wildlife movement and would not create or worsen pinch points in an existing wildlife corridor. It is acknowledged that wildlife use can be affected by human activity, including passive activities such as trail use. However, implementation of the Trails Master Plan would not worsen potential effects that are already occurring in unauthorized trails within the city, and may improve general conditions in areas where the Trails Master Plan would implement features that better define where users can and cannot go. However, if the project-specific biological analysis determines that this area could contribute to a functioning wildlife corridor, then design features that accommodate wildlife movement would be considered for the project, such as lighting restrictions, split-rail fencing, smooth-wire fencing, natural screening (i.e., boulders, native shrubs), or in some cases, restrictions on all types of linear fencing or screening.

G-6 The comment states that there are studies that have documented negative impacts that dogs on trails have on wildlife. The commenter does not offer suggestion on how the city should consider restricting this ongoing use, which is fundamental to the community. The intent of the Trails Master Plan is not to place restrictions on the communities' ability to walk their dogs along trails. Dogs are allowed on the city's trails, provided they are kept on a leash, kept under the control of their owner, and picked up after. Future Village H Trail is proposed to be a multi-use Recreational Trail Type 2, which allows on-leash dogs, consistent with other trails within the City of Carlsbad.

Furthermore, the San Diego County Code of Regulatory Ordinances, Section 62.669, Restraint of Dogs Required, Subsection (b) (3), indicates:

San Diego County Code of Regulatory Ordinances, Sec. 62.669. Restraint of Dogs Required.

(a) A dog's owner or custodian or a person who has control of a dog shall prevent the dog from being at large, except as provided in subsections (b) and (d) below.

(b) A dog's owner or custodian who has direct and effective voice control over a dog to ensure that it does not violate any law, may allow a dog to be unrestrained by a leash while a dog is assisting an owner or custodian who is:

(3) On public property with the written permission of and for the purposes authorized by the agency responsible for regulating the use of the property.

The Carlsbad City Council has adopted by reference the San Diego County Code of Regulatory Ordinances, via Carlsbad Municipal Code Section 7.08.010. B, which reads:

Carlsbad Municipal Code, Sec. 7.08.010. Adopted by reference.

B. Title 6, Division 2, Chapter 6, of the San Diego County Code of Regulatory Ordinances, as amended by Ord. No. 10036 (N.S.), effective 2/26/10, relating to animal control, is adopted by reference and incorporated as part of this code, except that whatever provisions thereof refer to a County of San Diego board, territory, area, agency, official, employee, or otherwise it shall mean the corresponding board, territory, area, agency, official, employee, or otherwise of the city, and if there is none, it shall mean that the county is acting in the same capacity on behalf of the city. A copy of the referenced ordinance is on file in the city clerk's office.

To date, the City Council has not adopted exceptions to the above code sections for off-leash dogs on city trails. The City Council has also not expressed an interest in considering such exceptions, nor have they directed staff to pursue drafting ordinances that would provide such exceptions. Therefore, the revised draft of the City of Carlsbad Trails Master Plan does not account for trails that would allow for off-leash dogs.

G-7 The comment recommends that trail opening at Tamarack Avenue be designed to improve wildlife movement. The analysis within the IS/MND is at the programmatic level and includes analysis based on the currently available information on each trail segment. Where potentially significant impacts have been identified at the program level, further analysis will be required at the project level that will analyze conditions and impacts for each proposed trail segment once the specific alignment and other project-specific details are available. If significant biological

resources impacts are identified for the proposed trail, mitigation measures BIO-1 through BIO-8 will be implemented as applicable. Implementation of these measures would ensure that impacts to biological resources would be minimized or avoided.

- G-8 The comment states that increased monitoring and enforcement could minimize or eliminate impacts to wildlife movement. See response G-6 regarding monitoring and enforcement and response G-7 regarding project-level design.
- G-9 The comment recommends that further study be done on impacts to wildlife movement and reference documents such as the pinch point study and other documents cited in the comment letter. See response G-5 regarding wildlife corridors.
- G-10 Commenter is unaware of any problematic trails having been closed, despite the policies in the HMP to do so under certain conditions. See response G-6 regarding closing trails; trails may be closed to avoid or minimize impacts to sensitive habitat and wildlife. Many illegal trails have been closed at Lake Calavera Preserve to avoid or minimize impacts to sensitive habitat and wildlife. See exhibit "Trail Changes Made Since 2006 Environmental Report" for reference. Regarding monitoring and enforcement, see response G-8.
- G-11 The comment seeks clarification as to user restrictions on trails. All trails in the city are multi-use, meaning that bike use is allowed along with hiking, jogging and dogs on leash. Bicycles would be allowed on all trail types, except for select cases where land owners/wildlife agencies limit the use of the bicycles due to habitat preservation. Trails would provide regulatory signage that would state if bicycles are not allowed on the trail. These trails would be consistent with HMP criteria.
- G-12 The comment notes that the TMP is inconsistent with the General Plan with respect to trail connections at the eastern termini of Marron Road and at Cannon Road. These trail connections have been added to Trails Master Plan and the Final IS/MND. Impacts from the inconsistency would not occur. No revision to the IS/MND is necessary.
- G-13 The comment states that the trail link through the Buena Vista Creek Valley (BVCV) was part of a settlement agreement concerning the Quarry Creek project. Please see response G-12.
- G-14 The comment notes the complexity of achieving a trail connection through the BVCV, but supports the city's efforts to do so. See response G-12. With the inclusion of this trail, additional regulation of the trail by the city will be enabled.
- G-15 The comment states that exclusion of the two trail connections cited in comment G-12 will result in excessive GHG impacts. See response G-12.
- G-16 The comment warns that TMP notes concerning the two trail segments in question represent impermissible "piece-mealing" under CEQA. See response G-12.
- G-17 The comment identifies an existing condition at College Boulevard and Cannon Road and recommends that the city's Pedestrian Master Plan Safe Routes to Schools section be updated to plan improvements for the Sage Creek Canyon High School vicinity. This comment will be

forwarded to the city's Transportation Division staff as Safe Routes to Schools is not within the scope of the Trails Master Plan.

- G-18 The comment notes that Figure 1.2 is not consistent with Figure 3.4, particularly with respect to the North Coast Bike Trail. Figure 1.2 depicts various regional trail initiatives, including the North Coast Bike Trail which is a component of Caltrans' North Coast Corridor (NCC) project. Figure 3.4 identifies city-planned bicycle facilities and pre-dates the NCC project. The TMP harmonizes the two by including elements of both plans, such as trail segments 7F and 7G (see Figure 5.1 Composite of Existing and proposed Trails). The comment also questions the cost-effectiveness of having the two parallel routes. Segment 7F is part of the North Coast Bike Trail, a component of Caltrans' NCC project, and which is required by the California Coastal Commission in order to provide enhanced coastal access and recreation. Its removal and reallocation of funds would require the cooperation of Caltrans and amendment of the Coastal Commission-approved Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP). Also, Caltrans-installed multi-modal improvements must be made within the corridor project area.
- G-19 The comment points out that there was no appendix of public comments included in the TMP, as stated on p. 2-5. This is correct; page 2-5 has been revised to better align with the subheadings that follow.
- G-20 The comment notes there is no pedestrian access along the portion of Jefferson Street between the planned westerly terminus of Trail 1B and Hosp Grove trails. TMP will show proposed Trail Type 5 (sidewalk connector).
- G-21 The comment suggests that trail segments 1B and 1C should be identified as part of a regional facility through Oceanside and into Vista, in order to generate support and funding. To date, no interagency coordination has taken place to plan a regional trail as described; however, trails segments 1B and 1C as described in the TMP would not preclude the ability to do such regional planning in the future.
- G-22 The comment points out that the Buena Vista Lagoon is incorrectly labeled as, "Buena Vista Creek Ecological Reserve" in Figure 4.2. The label will be corrected to read, "Buena Vista Lagoon Ecological Reserve."
- G-23 The comment suggests that the existing cul-de-sac at east Haymar Drive be integrated as a trailhead. Noted, the proposed trailhead w/o parking will be moved to the cul-de-sac at the end of the Haymar Street, by Marron Adobe House.
- G-24 The comment states that the TMP fails to show a number of trails planned within the Quarry Creek Master Plan area, and fails to show planned trailheads with parking at the easterly terminus of Marron Road and at Quarry Creek Master Plan Area P-5 (the timing of which are subject to a litigation settlement agreement). The comment also expresses concern with the characterization of the future trail between these two trailheads through the BVCER. The TMP does in fact show the trailheads in question (See TMP Figures 4.3 and 5.1). Since the release of the draft TMP, city staff have met with CDFW to review potential solutions that would be acceptable to the resource agencies. At this time, however, the area remains closed to recreational use, per CDFW regulations.

G-25 The comment states that there has been much resident interest in and effort planning trails at the south shore of Agua Hedionda Lagoon, and that the TMP needs to provide a better justification for what is proposed and why it is preferable to the community's vision. The TMP proposes a Type 2 Recreational Trail on the AHL (Segment 7C). It will begin at the future I-5 bridge (proposed as part of the Caltrans widening project). The trail alignment is proposed to traverse along the upper bluff, on the lagoon's south shore, and terminate at the Cannon Road underpass. Specific trail alignment is diagrammatic and will be refined and verified in the project development phase. Part of the proposed segment loops within the Hub Park lease area. The loop within the Hub Park area can potentially be developed by the city, but it requires a public access easement granted by the SDG&E to allow access to the trail. Currently, Hub Park has no egress/ingress within city-managed land to allow for connectivity. Therefore, trail development for egress/ingress would need to occur in conjunction with a private development and/or through a collaborative effort with adjacent property owners. A private development project could be conditioned to construct a portion of the trail outside of the Hub Park area which would provide egress/ingress to future trails within Hub Park. Prioritization for development of trail segments is based on several criteria, including: City Council direction, conditions of approval for private development, transportation initiatives of governments, availability of local and regional funding for public projects, and constructability by city staff and volunteers.

Proposed trail segment 7C will undergo project level environmental (CEQA) review in conjunction with the development phase to determine the final alignment of the trail. Factors such as: ownership of the land, cultural resources, vegetation, topography, and preserve/habitat status will be taken under consideration in the delineation of the trail. Connectivity to the Discovery Center through open space is constrained by: 1) steep terrain between the Hub Park area and the Discovery Center; 2) riparian habitats; 3) delineation of the hardline Habitat Management Plan (HMP) preserve; and 4) ownership rights.

G-26 This comment refers back to previous comments regarding trail segments 1B and 1C. Please see responses G-20 through G-24.

G-27 The comment expresses concern regarding trail segments 2A and 2B and the need to have a plan in place prior to their development to address increased public impacts that could occur to the Buena Vista valley. As stated in Response G-24 above, city staff have met with CDFW to develop a solution that is acceptable to the resource agencies, however the area is currently closed to recreational use per CDFW regulations. Development of segments 2A and 2B will be coordinated with development of the trail through BVCER. This will be noted in segment description, Chapter 5.

G-28 The comment states that trail segment 5B Village H South should be divided into two segments: one near Victoria Avenue that can be opened promptly with minimal improvements, the other at a later date to Tamarack Avenue, which will require more planning and construction work. Chapter 5 will be revised to note that development of the trail segment 5B will be phased to allow the opening of the historic trail to public use after the land transfer to the city.

G-29 The comment questions the cost-effectiveness of planning three parallel trails: segments 7A, 7F and 7G, and suggests that trail 7F could be eliminated and the funds reallocated to other trails such as 7C. Please see response G-18.

- G-30 The comment states that trail segment 7C should be phased, with some immediate public benefit. Please see responses G-25.
- G-31 The comment questions the timing of trail segments 7D and 7E. Timing of development is based not only on the length of the segment, but on the complexity of the project and funding source. In this case, segment 7D is part of the Carlsbad Active Transportation Strategy (CATS) program and is scheduled for construction concurrent with the anticipated street improvements. Segment 7E is a Nature Trail located within an area owned by Caltrans, with known significant impacts to environmental and cultural resources. Development of this segment is a collaborative effort of several public agencies and non-profit organizations, and requires further community input, environmental review and agency permitting.
- G-32 The comment notes that trail segments 8A and 8B will be expensive to implement, but that the cost may be justified if they will result in travel mode shift. The comment also states that new development benefitting from these trails should pay their fair share of trail costs. The city has a well-established growth management program that ensures new development contribute their fair share toward building the public facilities necessary to maintain a high level of service to the City of Carlsbad's residents. Generally-speaking, mechanisms to ensure fair-share participation include land-owner dedications and easements, direct construction and maintenance, and payment of impact fees. TMP Chapter 8 describes the general funding framework and identifies specific funding opportunities for trail development. More detailed cost estimates and analysis of the appropriate mix of funding and/or dedication requirements are developed as part of project-level planning and design for individual trail segments.
- G-33 The comment notes that trail segment 9E reflects previous planning and environmental analysis done for the Cantarini project, but that the project may be redesigned in the near future. With this understanding, coupled with CDFW's concerns regarding trails through the Carlsbad Highlands Ecological Reserve, the comment suggests the trail alignments in this area should be reconsidered. The revised TMP will show a simplified outline of the trail minimizing impacts to the habitat, however the final alignment will be developed in the project development phase in collaboration with the developer.
- G-34 The comment expresses concern that trail segment 9F could impede wildlife movement if such impacts are not considered during trail planning and design. Project-level design and analysis in compliance with mitigation measure BIO-1 would consider impacts to wildlife movement and would be designed to avoid or minimize potentially significant impacts. Please also see response G-5.
- G-35 The comment states that since management funding for existing hardline preserves (such as Carlsbad Raceway) has already been established by endowment, it is unlikely such funding could be increased to cover trails monitoring and enforcement. Trail 9F is proposed to be developed and maintained by the city. As part of the management protocol, the trail will be included in the city trail inventory, and enforcement and monitoring will be conducted by designated land managers, rangers and a private security company hired by the city. See also TMP Chapter 7 regarding trail operations and maintenance.
- G-36 The comment questions the cost estimates for trail segments 9G and 12A. Segment 9G is an integral part of the construction of future College Boulevard project and Segment 12A is integral

to the Carlsbad Boulevard realignment project. The estimated project costs include the trail, roadway and associated improvements. A clarifying note to that effect will be added to the description of Segments 9G and 12A.

- G-37 The comment notes that trail segments 10A and 10B are expensive parallel trails, and that the city should evaluate whether there are alternative ways to enhance beach connection with other funding partners. Segments 10A and 10B depict conceptual alignments based on various initiatives in the city. When a proposed trail becomes a project, precise alignment will be analyzed and refined to fit the needs of the community and minimize environmental, cultural and urban impacts. Please also see response G-32.
- G-38 The comment requests that the city consider extending trail segment 10D to connect to Aviara Community Park. Segment 10D is proposed on the existing utility road with minimal disturbance to the existing habitat. Steep terrain and hardline HMP preserve create significant constraints in connecting this segment to Aviara Community Park.
- G-39 The comment suggests it would be helpful to summarize projects and costs by year in Table 5.2. Table 5.2 sorts proposed segments by Estimated Implementation Date in column 3 and Estimated Construction Cost is listed in column 4. For added clarity, the table has been revised to group trails by implementation phase (through 2020, 2021-2025, and 2025-2030).
- G-40 The comment states the TMP is not clear whether bikes are allowed on Type 1 nature trails, and that the HMP has specific standards for mountain bike trails which are not found in the TMP. As stated in TMP Section 6.3, all trails in the city are multi-use, which means they are open to bikers, hikers, joggers, strollers, and dogs on leash. In a few instances, where the trails are proposed in the CDFW ecological reserves, trail use may be limited to pedestrian only. If this approach prevails, appropriate provisions for signage and enforcement will be included with trail development. Section 6.3 also discusses the need to evaluate potential trail impacts on sensitive habitat areas, and that HMP requirements shall be taken into consideration for future trail alignments and construction. Furthermore, for trail projects within or adjacent to environmentally sensitive areas, mitigation measures BIO-1 through BIO-8, as specified in the IS/MND, will be applied to avoid, minimize or mitigate adverse impacts to sensitive habitats resulting from trail construction and use.
- G-41 The comment states that fencing design needs to be compatible with wildlife and that a minimum bottom rail or wire height should be considered. The comment also requests that a note be added that the plastic mesh used around straw wattle be removed to avoid creating problems for herps. Fence details in Appendix A will be revised to specify a 15" minimum clearance from finish grade to the bottom fence rail, wire or cable, as applicable. Straw wattle is one of the city standard Best Management Practices (BMP) used to prevent slope erosion, increase infiltration and help to retain soil on the slope. As part of regular trail maintenance, straw wattles are replaced or removed to reduce pollution from mesh. Where possible, other BMPs, such as gravel bags, rip-rap, and earth dam may be used to minimize impacts to habitat.
- G-42 The comment states that bridge and tunnel design recommendations do not adequately consider wildlife movement. TMP Section 6.11 will be expanded to add wildlife movement considerations in bridge/tunnel designs.

- G-43 The comment suggests that modifications to design standards can be considered as part of the planning to enhance public amenities for a given area. TMP Public Art Section 6.9, page 6-35 already mentions that public art can be incorporated into signage, benches, or pavement. Modifications to the standards will be considered on case-by-case basis when public art and other public amenities are part of the overall program for the trail.
- G-44 The comment states the TMP needs to have a more robust discussion of closures of unauthorized trails. Section 7.4 Trail Closure will be revised to add further discussion on the closure of unauthorized trails.
- G-45 The comment supports the city's policy to allow only leashed dogs on city trails. The commenter's understanding of city regulations is correct. Please see response G-6 for a summary of the city's regulations regarding restraint of dogs.
- G-46 The comment states that TMP Section 7.4 lacks discussion of trail closures to protect natural resources. Section 6.3 notes that seasonal trail closures may be required in some cases to minimize impacts to sensitive habitat and wildlife, and Section 7.4 states that permanent trail closures may be necessary for similar reasons. Section 7.4 will be revised to provide clearer discussion of trail closure for nature resource protection purposes.
- G-47 The comment requests that the TMP include provisions regarding drone use and skateboarding on city trails. Staff will forward the comment to the Police Department for amendment consideration. Currently, skateboarding, inline skates, roller skates, toy vehicles, or any other similar form of transportation is prohibited on public property where such prohibition is posted by signs. The list may be amended from time to time by resolution of the City Council. (Ord. CS-139 § 2, 2011). Such regulations are enforced by the City of Carlsbad Rangers and Police Department.
- G-48 The comment states that NGO's such as Preserve Calavera can support the city in trails implementation, and that trail users/volunteers can provide community fundraising support. The city appreciates the comment, and we note that TMP Chapter 7 and Appendix B discuss the extensive use of volunteers for trail construction and maintenance, and Chapter 8 discusses trails funding, including non-governmental, service organization sources.

April 10, 2017



Ms. Pam Drew, Associate Planner
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008
Pam.Drew@carlsbadca.gov

Subject: Comments to Draft Trails Master Plan

Dear Ms. Drew:

The San Pacifico Community Homeowners Association has had the opportunity to briefly review the Draft Trails Master Plan, and in particular the trail issues in and surrounding our community of approximately 400 homes. Following are our initial review comments which include references to page and figure numbers within the Draft Trails Master Plan. We hope the comments are helpful.

- H-1
- H-2
- H-3
- H-4
- H-5

P3-11 – Fig 3.3:

- a. The South Carlsbad State Campground roadway and developed campsites buildings are inaccurately classified as “preservation of natural resources”. The area is a developed visitor accommodation land use built on a coastal bluff next to the beach.

P3-13 – Fig 3.4:

- a. A ‘proposed class I bike path is mapped between La Costa Avenue and Avenida Encinas in error on/though existing San Pacifico homes.

P3-15 – Fig 3.5:

- a. Missing planned and City/Coastal Commission required ‘proposed Type 2 bluff top and loop trail’ along North shore of Batiquitos Lagoon between Carlsbad Boulevard and the NCTD ROW per the City and Coastal Commission adopted Poinsettia Shores Master Plan and LCP [see Exhibit 11 on page 27 of the Poinsettia Shores Master Plan and LCP].
- b. There is no ‘existing sidewalk connection type 5’ along:
 - a. both sides of Carlsbad Boulevard from
 - i. La Costa Avenue north to the Cape May Hotel
 - ii. North of Island Way to Cannon Road.
 - b. West side of Carlsbad Boulevard from
 - i. La Costa Avenue north to Cannon Road

p.4-23 – Fig 4.11:

- a. Missing existing trail from the Coaster Station to Carlsbad Boulevard

- p.4-27 – Fig 4.13:
- H-6 a. Missing planned and City/Coastal Commission required ‘proposed Type 2 bluff top and loop trail’ along North shore of Batiquitos Lagoon between Carlsbad Boulevard and the NCTD ROW per the City and Coastal Commission adopted Poinsettia Shores Master Plan and LCP [see Exhibit 11 on page 27 of the Poinsettia Shores Master Plan and LCP].
 - H-7 b. There is no ‘existing sidewalk connection type 5’ along:
 - a. both sides of Carlsbad Boulevard from
 - i. La Costa Avenue north to the Cape May Hotel
 - ii. North of Island Way to Cannon Road.
 - b. West side of Carlsbad Boulevard from
 - i. La Costa Avenue north to Cannon Road
 - H-8 c. It is believed that 12.1 is currently San Pacifico Master Homeowners Association’s private HOA trail per the City and Coastal Commission development approvals and adopted Poinsettia Shores Master Plan and LCP [see Exhibit 11 on page 27 of the Poinsettia Shores Master Plan and LCP]. Can it be documented if a public trail easement exists, or is proposed to be acquired on 12.1? A public trail could be desirable if a complete public trail connection can be made to the Coaster Station. Such a trail would provide safe and direct pedestrian and bike access to the Poinsettia Coaster station and enhance active transportation and VMT reduction.
 - H-9 d. There are two [2] “12A trails” shown that are in different locations and colors. This seems to be an error.
 - H-10 e. One of the proposed 12A trails is supposed to cross under Carlsbad Boulevard providing a connection with the pedestrian facilities on the west side of Carlsbad Boulevard and beach access. This pedestrian underpass is in the City’s Adopted Ponto Beachfront Village Vision Plan as referenced in the City’s General Plan. This City adopted and planned trail connection under Carlsbad Boulevard should be shown.
 - H-11 f. Avenida Encinas and Poinsettia Lane provide the only pedestrian and bike, and vehicle access over the NCTD ROW to the beach - a major destination. As such pedestrian, bike and vehicular traffic from existing and future Citizens and visitors west of Interstate 5 and the larger population East of Interstate 5 is concentrated into these two [2] narrow corridors. Already due to the volume of pedestrian movements Citizens that live in San Pacifico regularly have to walk in the street and bike lane to access the beach due to the limited capacity of pedestrian facilities. The bike lane appears to be a minimum width, even though bike lane is [a regional rail trail bike ‘path’] and main bike path to the beach. The concentration of vehicle traffic has encouraged drivers to speed on the streets making adjacent bike and pedestrian less safe. Many San Pacifico Citizens [and other beach visitors] take surfboards, beach chairs and wagons and baby strollers that require even wider than normal pedestrian facilities. The need to provide for pedestrians and bike carrying surfboards and other beach equipment, and to accommodate baby strollers to allow mothers and small children safe access to the beach is important in all pedestrian areas near the beach. This is particularly of critical importance in South Carlsbad where pedestrian, bike and vehicular traffic is concentrated in just a few areas [Avenida Encinas and Poinsettia Lane] over the NCTD ROW. These limited crossings to the beach should have ‘special standards’ that reflect the special function and accommodation they need to provide. To a degree a similar special considerations should be given to the limited and concentrated pedestrian, bike and vehicle crossings of Interstate 5 in Carlsbad.

H-12

As Citizens we hope you incorporate our comments and suggestions. Please let us know if you need to communicate with members of our community to gain a deeper understanding of the concerns, issues and functioning of pedestrian, bike and vehicular movements and facilities in our community. We have representatives that can assist you.

Sincerely,



Lee Leibenson, PCAM®, CCAM®
Senior Community Association Manager
San Pacifico Community Association

Copy:

City Council: council@carlsbadca.gov
Planning Commission: Don.Neu@carlsbadca.gov
Proposed Ponto Developments: jason.goff@carlsbadca.gov
Parks Commission: Kasia.Trojanowska@carlsbadca.gov
Coastal Commission: Gabriel.Buhr@coastal.ca.gov

Letter H – Lee Leibenson, Senior Community Association Manager, San Pacifico Community Association, April 10, 2017

- H-1 The comment states that the state campgrounds depicted in Figure 3.3 are incorrectly categorized as open space for preservation of natural resources. The designation as shown in this figure is correct, in that it is consistent with the official designation in the General Plan Open Space, Conservation and Recreation Element, Figure 4-1. The Visitor Center and associated infrastructure is an integral part of the State Park Beach, therefore included in the category “Preservation of Natural Resources”, but they are further defined as developed land cover in HMP, Section C.
- H-2 The comment states that Figure 3.4 incorrectly maps a Class I bike path through existing San Pacifico homes. Figure 3.4 is a conceptual exhibit encompassing the entire city and showing associations between existing and proposed bike routes. The diagrammatic representation is appropriate for master planning purposes. Each of the proposed routes will be further defined on the project level and routed within permitted rights-of-way.
- H-3 The comment states that a bluff-top and loop trail along the north shore of Batiquitos Lagoon as required in the Poinsettia Shores Master Plan is missing. Figure 3.5 depicts only existing trails. Proposed trails are depicted on Figure 5.1 Composite of Existing and Proposed Trails.
- H-4 The comment states that Figure 3.5 incorrectly identifies as ‘existing’ sidewalk connectors along stretches of Carlsbad Boulevard from La Costa Avenue to Cannon Road where no such sidewalks exist. This statement is accurate, and Figure 3.5 will be corrected accordingly.
- H-5 The comment states the existing trail from the Coaster Station to Carlsbad Boulevard is missing from Figure 4.11. The revised map will show sidewalk connector from the Poinsettia Station to Carlsbad Boulevard.
- H-6 The comment notes that a planned bluff-top and loop trail along the north shore of Batiquitos Lagoon as required in the Poinsettia Shores Master Plan is missing. The TMP will be revised to add the missing recreational trail - Segment 12I between Carlsbad Boulevard and the NCTD right-of-way.
- H-7 The comment states that Figure 3.5 incorrectly identifies as ‘existing’ sidewalk connectors along stretches of Carlsbad Boulevard from La Costa Avenue to Cannon Road where no such sidewalks exist. This statement is accurate, and Figure 3.5 will be corrected accordingly.
- H-8 The comment states an understanding that trail segment 12.1 is privately-owned and maintained by the San Pacifico Master HOA, and questions whether a public trail easement exists. The comment also states that a public trail here could be desirable if a complete public trail connection could be made to the Poinsettia Coaster Station. It is correct that Segment 12.1 San Pacifico Trail is privately developed and maintained and currently it does not have a public access easement over it. However, it plays a vital role in providing a complete public connection from/to the Coaster Station. Therefore, the city intends to collaborate with the HOA to obtain a trail easement in order to open it to the public.

- H-9 The comment points out a possible labeling error for trail segment 12A. The trail along Ponto Drive will be designated as 12J, and segment 12A will include only the route along Carlsbad Boulevard.
- H-10 The comment states an opportunity to provide a connection under Carlsbad Boulevard to gain access to the west to the beach, as envisioned in the Ponto Beachfront Vision Plan. The trail segment 12A (to be re-labeled 12J) description will be revised to note that the loop alternative along Ponto Drive has the potential to connect to the west side of Carlsbad Boulevard through the underpass.
- H-11 The comment makes a case for applying special standards for Avenida Encinas and Poinsettia Lane as these streets carry high volumes of vehicles, pedestrian and cyclists across the railroad ROW to get residents and visitors to the beach. The city's Transportation Department is developing a Sustainable Mobility Plan, which is an extensive analysis of bicycle, pedestrian and transit access to destinations throughout the city. There will be many opportunities for the public to voice their concerns about access to major destinations, such as the city's beaches. Staff will consider this comment as early input, and will list the Ponto neighborhood as an area of concern.
- H-12 The comment is a concluding paragraph expressing hope that their comments are considered and offering to provide assistance. Comment is appreciated; no response is necessary.

City of Carlsbad

APR 27 2017

Planning Division

PALA TRIBAL HISTORIC PRESERVATION OFFICE

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059

760-891-3510 Office | 760-742-3189 Fax



PALA THPO

April 20, 2017

Pam Drew
City of Carlsbad
1635 Faraday Ave
Carlsbad, CA 92008

Re: City of Carlsbad Trails Master Plan

Dear Ms. Drew:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). It is, however, situated in close proximity to the Reservation and information generated would likely be useful in better understanding regional culture and history. Therefore, we request as a courtesy to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and/or any documentation that might be generated regarding previously reported or newly discovered sites. Further, if the project boundaries are modified to extend beyond the currently proposed limits, we do request updated information and the opportunity to respond to your changes.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO SHASTA C. GAUGHEN AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

Consultation letter 3

I-1

I – Shasta C. Gaughen, Tribal Historic Preservation Officer, Pala Band of Mission Indians, April 20, 2017

- I-1 The comment letter acknowledges that the project is not within the boundaries of the recognized Pala Indian Reservation and beyond the boundaries of the territory that the tribe considers its Traditional Use Area. The Pala Band of Mission Indians (PBMI) requested to be kept up to date for project updates, reports of investigations, and/or any documentation that might be generated regarding previously reported or newly discovered sites. If project boundaries are modified, updated information and the opportunity to respond to the changes would be provided. The city will provide notice to PBMI for review and consultation on project-level assessments in accordance with mitigation measures CUL-1 through CUL-4, and consistent with the adopted City of Carlsbad Tribal, Cultural and Paleontological Guidelines.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

3 May 2017

City of Carlsbad

MAY 05 2017

Planning Division

To: Ms. Pam Drew, Associate Planner
Planning Division
City of Carlsbad
1635 Faraday Avenue
Carlsbad, California 92008

Subject: Draft Mitigated Negative Declaration
City of Carlsbad Trails Master Plan
GPA 2017-0001/SS 12-06

Dear Ms. Drew:


I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the initial study for the project, we have the following comments:

1. As the details of any trail segments cannot be evaluated until project-level documentation is available, we reserve corresponding comments until that time.
2. The nature of this project is such that there is a greater than typical opportunity to avoid impacts to cultural resources. That, of course, is the preferred situation. This can be evaluated at the project level and may be accomplished by rerouting trails, relocating facilities, capping of sites, and other alternatives which may become apparent at the time the project is studied.
3. Mitigation measures CUL-1 through CUL-4 are generally acceptable. However, in the absence of disclosure of the details of how encountered cultural resources are defined and to be handled, we are unable to ascertain whether the impacts to scientific cultural resources will be mitigated to the level of insignificance. Therefore, as mentioned above, we will reserve specific comment until the project-level environmental public review takes place.

Thank you for this opportunity to comment. Please ensure SDCAS is included in the distribution of the project-level environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

J-1

cc: SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

Letter J – James W. Royle Jr., Chairperson, Environmental Review Committee, San Diego County Archaeological Society, Inc., May 3, 2017

- J-1 The comment letter acknowledges that project-specific determination of impacts to cultural resources cannot be determined at the programmatic level, and encourages avoidance to cultural resources where possible. The San Diego County Archeological Society concurs that implementation of mitigation measures CUL-1 through CUL-4 are acceptable at this time and will reserve comments to when project-specific environmental review is available. Commenter requested to be included in distribution of future project-level environmental documentation. The city will provide notice for review and consultation on project-level assessments in accordance with mitigation measures CUL-1 through CUL-4, and consistent with the adopted City of Carlsbad Tribal, Cultural and Paleontological Guidelines.

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2635 Fax:(760) 692-1498



June 30, 2017

Pam Drew
City of Carlsbad
Community & Economic Development
1635 Faraday Avenue
Carlsbad, CA 92008

Re: City of Carlsbad Trails Master Plan - GPA 2017-0001/SS 12-06

Dear Ms. Drew:

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your notification regarding the City of Carlsbad Trails Master Plan GPA 2017-0001/SS 1206 and we thank you for the opportunity to consult on this project. The location you have identified is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

Embedded in the Luiseño Territory are Rincon's history, culture and identity. The project is in with the Luiseño people however, it is not within Rincon's Historic Boundaries. We do not have any additional information regarding this project at this time however; Rincon would like to continue its participation in the consultation process. We would also like to request a copy of the Cultural Resources Report and record search results be forwarded to us at your earliest convenience.

If there are further questions or concerns please do not hesitate to contact our office at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho
Manager
Rincon Cultural Resources Department

Bo Mazzetti
Tribal Chairman

Tishmall Turner
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

K-1

Letter K – Destiny Colocho, Rincon Band of Luiseño Indians, June 30, 2017

K-1 The comment letter acknowledges that the project is not within Rincon’s historic boundaries and has no project-related comments at this time. Due to the project’s proximity to Rincon’s specific area of historic interest, the Tribe requested the opportunity to continue to participate in consultation [during implementation of trails projects]. The city will provide notice for review and consultation on project-level assessments in accordance with mitigation measures CUL-1 through CUL-4, and consistent with the adopted City of Carlsbad Tribal, Cultural and Paleontological Guidelines.

Commenter also requested that the tribe be provided with a copy of the Cultural Resources Report and records search conducted in conjunction with the Trails Master Plan. Staff provided the information as requested.

SAN LUIS REY BAND OF MISSION INDIANS

1889 Sunset Drive • Vista, California 92081

760-724-8505 • FAX 760-724-2172

www.slrmissionindians.org

July 7, 2017

Pam Drew
Senior Planner
Planning Division
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008

VIA ELECTRONIC MAIL
Pam.Drew@carlsbadca.gov

**RE: COMMENTS ON THE NOTICE OF INTENT TO ADOPT A MITIGATED
NEGATIVE DECLARATION FOR THE CARLSBAD MASTER TRAILS
PLAN**

Dear Ms. Drew:

We, the San Luis Rey Band of Mission Indians ("Tribe") thank the City of Carlsbad ("City") for the opportunity to submit the following comments regarding the Carlsbad Master Trails Plan Mitigated Negative Declaration ("MND") hereinafter referred to as the Master Trails Plan ("Plan"). The Tribe has discussed this Plan and all potential negative impacts it may cause to our tribal cultural resources with the City pursuant to AB 52 consultation.

In addition, the Tribe has received and reviewed the City's Notice of Intent to Adopt a MND for this Project and all of its supporting documentation as it pertains specifically to the protection and preservation of Luiseño tribal cultural resources that may be located within the areas that will be subject to ground disturbing activities in the Plan. After our review of the MND, the Tribe is satisfied and concurs with the proposed Cultural Resource Mitigation Measures contained within the MND, with the explicit understanding with the City that when individual trails are being developed and/or may come to fruition, additional consultation with SLR will be forthcoming in the early stages of development and additional mitigation measures, that may be necessary and culturally appropriate to lessen potential negative effects, will need to be adopted by the City.

As always, the Tribe looks forward to working with the City to guarantee that the requirements of the CEQA are rigorously applied to this Plan and all projects. We thank you for your continuing assistance in protecting our invaluable Luiseño tribal cultural resources.

Sincerely,



Merri Lopez-Keifer

L-1

Letter L – Merri Lopez-Keifer, San Luis Rey (SLR) Band of Mission Indians, July 7, 2017

- L-1 The commenter requested that SLR be afforded opportunity for additional consultation during the early stages of development of individual trail projects, and application of additional mitigation measures that may be necessary and culturally appropriate to lessen potential negative effects. The city will provide notice for review and consultation on project-level assessments in accordance with mitigation measures CUL-1 through CUL-4, and consistent with City Council Policy 83 and the adopted City of Carlsbad Tribal, Cultural and Paleontological Resources Guidelines.

May 9, 2017

Pam Drew
1635 Faraday Avenue
Carlsbad, CA 92010

RE: Draft City Trails Plan 2017

Dear Pam,

Thanks for letting me review a copy of this document. I was impressed by the amount of detail and thought put into its preparation. It has put a lot of good information into one source for future reference. I only have a few comments.

M-1

When evaluating trail segments the plan should also look at ownership patterns. It appears to assume that all property owners will be cooperative in the future construction of the trail segments addressed in this study. In some instances this may be problematic. For example Segment 7E Hallmark Trail East on the north side of Agua Hedionda Lagoon wetlands. This trail will have to cross property owned by several individual homeowners. If they are not cooperative it may be very difficult to construct this trail segment. In the past property owners along Segment 7B have been less than cooperative in dedicating easements across their property for trail segments. This same issue may arise with Trail Segments 8C and 8E through the Flower Fields. I believe that these would be popular trail segments, but the operator of the Flower Fields may be reluctant to allow free, unrestricted public access through their flowers. Opposition to trail segments from property owners can be an even greater constraint to their construction than biological or cultural resources.

M-2

What type of discuss was held with SDG& E, Caltrans and NCTD regarding trail segments in their right-of-way or easements? The implementation of a number of the trail segments rely on their cooperation.

M-3

A minor item, but Trail Segment 2B does not connect to the Cape in Calavera, it connects to the Knolls.

M-4

I support the recommendation that Nature Trails be no wider than four feet, we do not need wide trails through natural areas. The City should consider narrowing these trails down to two feet when going through sensitive cultural or biological areas to minimize impacts. Most trails through the Sierras or other natural areas are rarely four feet in width.

M-5

How were the implementation dates determined for each trail segment? I looked through the document, but could not find a clear explanation for this. It may have been in there, but I missed it.

M-6 Please do not give up on Segments 1C (Haymar to Quarry Creek) or the connection from Sage Creek High School to the terminus of Cannon Road in Oceanside. I understand that at this time the Wildlife Agencies may not be supportive, but both of these trail segments would provide much needed links.

M-7 Trail Segment 9E should be labeled Cantarini/Holly Springs since most of the trails shown for this segment are actually located on the Holly Springs property. How was the alignment of these trails determined? They appear to follow existing informal mountain bike trails some of which are heavily eroded and should be closed off.

M-8 The cost estimates are very useful, but when implementing this plan the City must be aware that the costs of the environmental review and obtaining the necessary permits from the various agencies involved can be far more expensive and time consuming than the actual construction of the trails.

M-9 Again, thanks for the opportunity to review this document and provide my comments. Overall it is a useful start in the right direction and provides a roadmap for the future implantation of further studies that will lead to the construction of the much needed trail segments.

Sincerely,



Mike Howes

Letter M – Mike Howes, May 9, 2017

- M-1 The comment states that the trails plan should consider underlying land ownership where trails are planned, and cites several trail segments where property owner cooperation could be problematic in getting trails built. In preparing the TMP, the project team did consider land ownership where trails are planned. Staff understands that working with owners is crucial to successful trail development and is an integral part of the project process. Acquiring trail dedications on private property is often achieved through the development process. For smaller, individual properties, assembling the necessary easements can be more of a challenge. This is discussed in TMP Section 3.7.
- M-2 The comment asks what discussions have been held with SDG&E, Caltrans and NCTD regarding trails proposed with their right-of-way or easements. Trails proposed in other agency rights-of-way will require future collaboration and compliance with each agency's protocol for acquiring public trail easements over their land. The resource agencies provided initial feedback on proposed trail segments during the public outreach phase for the Trails Master Plan. Staff anticipates further collaboration when a project is in the development phase.
- M-3 The comment points out that trail segment 2B would not connect to the Cape in Calavera Hills, but the Knolls development. The TMP will be corrected accordingly.
- M-4 The comment supports nature trail to be no more than four feet, and suggests they should be as narrow as two feet to minimize impacts to sensitive cultural and biological areas. The TMP notes that four feet is the maximum width of the Nature Trail Type 1. The alignment and width of each proposed trail will be refined in the project development phase to avoid and/or minimize impacts to sensitive environmental and cultural resource areas.
- M-5 The comment asks how trail implementation dates were determined in the TMP. The trail implementation dates were determined based on the anticipated schedules for known public and private projects. Trail development is an opportunistic process and its timing will be dependent largely upon the entity responsible for construction of the trails. For example, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval.
- M-6 The comment implores the city to not give up on the planned trail connections through the Buena Vista Creek and Carlsbad Highlands Ecological Reserves. The city supports trail connectivity through the BVCER in compliance with the City of Carlsbad General Plan Mobility Element. However, we understand that the trail is proposed on the CDFW's land, and that CDFW's primary goal for the BVCER is protection and preservation of habitat. Staff has met with CDFW to review potential solutions that would be acceptable to the resource agencies. At this time, however, the area remains currently closed to recreational use, per CDFW regulations.
- M-7 Comment states that trail segment 9E could be more accurately labeled Cantarini/Holly Springs, as most of the trails shown are actually located on the Holly Springs property. The name will be revised to Cantarini/Holly Springs Open Space Trails as requested. Current alignment is based on

the conceptual plan for this area. City staff will work with CDFW and the developer to simplify Segment 9E trail alignment and eliminate redundancy.

- M-8 The comment states that, the cost estimates in the TMP do not include environmental and permitting costs, which can be far more expensive than actual trail construction. Staff agrees that such costs are highly variable and could add significant cost to project budgets in some cases. Environmental review, agency permitting, and mitigation is not included in the estimated project costs as indicated in the project description for various trail segments.
- M-9 The comment is the closing paragraph expressing appreciation to provide comment and stating that the TMP is a useful start in the right direction. No response to this comment is required.

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Monday, May 08, 2017 8:23 AM
To: Joanne Dramko; Bill Vosti; Kasia Trojanowska
Subject: FW: Public Comment Regarding Trails Master Plan Environmental Review: Amanda Mascia

From: Amanda Mascia [<mailto:amandamascia77@gmail.com>]
Sent: Friday, May 05, 2017 11:43 AM
To: Pam Drew <Pam.Drew@carlsbadca.gov>
Cc: Kevin Crawford <Kevin.Crawford@carlsbadca.gov>; City Clerk <Clerk@carlsbadca.gov>
Subject: Public Comment Regarding Trails Master Plan Environmental Review: Amanda Mascia

Ms Drew,

Thank You for the chance to submit public comment on the Trails Master Plan (March 2017). Comments on two sections (Table 1:10A and Table 2:9A) are provided, and request further clarification before a negative impact declaration can be made.

**Table 1: TRAIL PROJECTS PROPOSED TO BE DEVELOPED BY THE CITY OF CARLSBAD
10A Coastal Corridor (Palomar Airport Road to Poinsettia Lane)**

New construction to include paving, lighting, landscape buffers, irrigation, fencing, public art, and trail-head amenities.

- N-1 **Public Comment:** Any trails system proposed in the Coastal Corridor (and in the LCP Area) needs to specifically not alter or change existing coastal access and parking. There is a vibrant surfing and scenic corridor scene on this stretch of coastline (from Palomar Airport Road south to the parking lot before the State Park). This is a natural area, that needs NO further art or lighting, other than that already provided by the spectacular view of the Pacific Ocean, sunsets and the stars and moon over the horizon.
- N-2
- N-3 In addition, "old 101" parcel (owned by the City of Carlsbad) that borders on the east of Carlsbad State Beach campgrounds should be given first priority to the State Beach to move eastward in order to deal with coastal bluff failure and erosion in the future. We must protect affordable options to visit our coast (camping) at all costs. The campgrounds are frequently rated the #1 tourist attraction to Carlsbad, and as such, the ability to provide campsites to move eastward should be a #1 priority.
- N-4
- N-5 All trails systems that are proposed for this stretch should take into account that the campgrounds needs to move east, on the 101 parcel.
- N-6 By not addressing coastal erosion in planning of the trail, there could potentially be a large environmental impact if a trail is built along already failing bluffs, and without consideration of existing coastal access/camping. Infrastructure that may be built to shore up a trail or amenities along the coast needs to refer to the Sea Level Rise Adaptability Study (also funded by the City) which clearly outlines that coastal armoring is the worse solution for beach diversity, wildlife and environment.

N-6
cont. | Lighting in this area should not be intrusive and it should not impede with the users' ability to stargaze and enjoy a darkened sky, as well as wildlife along our coastline. We have very few places on the coast where we can truly enjoy nighttime, without the impediment of manmade lighting.

N-7 | **The public needs more information on this project before a negative declaration can be made, as there could be a potential for impact as outlined above.**

Table 2: TRAIL PROJECTS THAT WOULD BE DEVELOPED BY PRIVATE APPLICANTS OR OTHER PUBLIC AGENCIES

9A Sunny Creek Road (Private Development) New Construction to include 4-foot wide decomposed granite surface, wood edging, trailhead amenities, and fencing.

N-8 | **Comment:** Future development in the Sunny Creek area need to take into consideration the environmental effects of development and subsequent impacts on the watershed and the wildlife. This area is a wildlife corridor. Any pathways, roadways, or projects that cut the area need to address the effects on the environment in regards to wildlife and waterways.

N-9 | All development and subsequent trail ways should ban uses of pesticides and herbicides, and plan for non-toxic uses and native plants only, in order to preserve an already threatened watershed.

N-10 | Any trails systems should include a means to allow for wildlife crossings and not inhibit wildlife with fences and other manmade structures.

N-11 | **The public needs more information on this project before a negative declaration can be made, as there could be a potential for impact as outlined above.**

Thank You for your time and consideration.

Kind Regards,

Amanda Mascia
amandamascia77@gmail.com
858-880-8917

Letter N – Amanda Mascia, May 5, 2017

N-1 The comment states that any trails system should not alter existing coastal access or parking. The city places a high value on access to the coast. General Plan Land Use and Community Design Element (LUCD) and Local Coastal Program (LCP) policies specifically call for protecting and enhancing coastal access (See for example, LUCD Policy 2-P.53, and LCP Mello II Policies 7-3 through 7-5). Implementation of the TMP provides an opportunity to do just that. The description of Type 6 Paved Multi-Use Trail identifies a variety of programming options available in the trail planning process. The final design will be based on an analysis of environmental and cultural resources, public safety, access needs, and feedback from the community.

N-2 The comment states that installation of public art or lighting is unnecessary due to the spectacular oceans views along the coast. As discussed in the Trails Master Plan, the creative trail art program is an avenue for local artists to create art within the city, making unique, educational, and memorable additions to the trails. The art would draw from the local natural and cultural environment, and may be incorporated into signs, benches, shelters, or pavement surfaces to be visually compatible with the surrounding area. The design would be presented and vetted through the public outreach process.

As discussed in Section I.d of the IS/MND, lighting would be provided for security for nighttime trail use and would be shielded. “Dark sky compliant” lighting would also be selected as appropriate to minimize light pollution and direct light downward to maintain views of the night sky. The project would not result in significant impacts related to aesthetic character or lighting. In addition, implementation of the trail would provide access for more city residents to enjoy the views of the Pacific Ocean.

N-3 The comment states that the Carlsbad State Beach campgrounds should be given first priority to relocate inland in response to future coastal bluff erosion. The city’s General Plan LUCD Element establishes the parameters for discussions with the State Parks Department regarding future improvements along the south Carlsbad Blvd corridor. According to LUCD Policy 2-P.52, principal objectives of coordination are to: “improve coastal access for all; conserve coastal resources; enhance public safety, including addressing threats to the campground from bluff erosion and sea-level rise; and create additional recreational opportunities, waterfront amenities and services, including modernization and expansion of the campgrounds to serve as lower-cost visitor and recreational facilities.” Planned trail segments 10A and 12A along the southern stretch of Carlsbad Blvd do not conflict with this policy in that the TMP anticipates that inland relocation of the southbound lanes of Carlsbad Blvd could occur. The specific trail alignment and use of the right-of-way will be determined through a future planning and design process.

N-4 The comment states the importance of protecting the campgrounds as an affordable visitor amenity. Please see responses N-1 and N-3 above.

N-5 The comment advises that trails planning along Carlsbad Blvd should consider that the state campgrounds should move east into the street right-of-way. Please see response N-3 above.

N-6 The comment cautions against potentially large environmental impacts if a trail is built along already failing bluffs. The comment also states that lighting for this area should not be intrusive. The trails proposed in the Trails Master Plan, including 10A, would not require shoring up to be

constructed. Please see Figure 3C in the IS/MND for a conceptual cross-sectional view of how a paved multi-use trail would be constructed. The project would not install measures that would be considered “coastal armoring,” such as installation of sandbags or seawalls. Further, during construction, the project would implement best management practices such as stabilizing disturbed areas, protecting slopes and channels, and controlling internal erosion.

Please refer to response N-2 regarding lighting.

- N-7 The comment states that more information is needed before a negative declaration of environmental impacts can be made. The analysis within the IS/MND is at the programmatic level and is based on the currently available information on each trail segment. The site-specific analysis of issues unique to individual trail projects, including trail 10A, would (as appropriate) be conducted at a later time in accordance with CEQA prior to the approval of such projects, the analysis of which would be focused by tiering from the environmental analysis conducted in this IS/MND.
- N-8 The comment notes that trail planning in the Sunny Creek area needs to consider impacts to the watershed and wildlife corridor. Section IV, Biological Resources, of the IS/MND describes potential impacts to biological resources. Trail segment 9A, would be subject to mitigation measures BIO-1 (project-specific biological surveys), and depending on the outcome of the project-specific survey, measures BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, and BIO-8 as appropriate. Implementation of these measures would reduce impacts to a less than significant level.
- N-9 The comment recommends that trails construction and maintenance should not include the use of chemical pesticides and herbicides. Mitigation measure BIO-7 has been revised to emphasize synthetic chemical-free methods of non-native invasive species removal (see underline for additions and ~~strikethrough~~ for deletions):
- BIO-7: Non-Native Invasive Inspection and Removal.** As part of the city’s routine maintenance inspections and where trails occur within or immediately adjacent to HMP Preserve areas, the city shall inspect trail edges for sign of non-native invasive plant species listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council (Cal-IPC 2006). If non-native invasive plant species are confirmed present within these areas, the city shall coordinate with the HMP preserve manager to determine the specific actions and responsibilities for treatment and removal. The specific actions and responsibilities will be performed in accordance with long-term management directives and requirements prescribed for the affected HMP Preserve area. Where such directives and requirements have not been prescribed and cannot be provided by the HMP preserve manager, they shall include the following, at a minimum:
- a. The least toxic method that effectively removes the weeds shall be used. The preferred method would not use chemicals. This can be accomplished through hand weeding along the linear elements of the trail. Other non-chemical means includes mowing before seeds are set.
 - b. If herbicides must be used for non-native invasive removal, at the direction of the Preserve Manager, invasive plants shall be treated with herbicides and left in place or removed and disposed of at an approved off-site location, such as the Waste Management facility at 5960 Reef Circle, Carlsbad, California. This would be

performed in accordance with the city's Integrated Pest Management (IPM) plan, updated in November 2017. The updated plan emphasizes the initial use of organic pesticides, limiting the use of chemical pesticides where the general public congregate, and when pests cannot be managed by other methods, using USEPA-level pesticides in a targeted manner and only if deemed necessary to protect public safety or economic loss.

- ~~e. The least toxic method that effectively removes the weeds shall be used.~~
- d. Herbicides may only be applied by a licensed pesticide applicator under the supervision of the HMP preserve manager or qualified biologist retained by the city.
- e. A qualitative assessment of non-native plant species coverage shall be completed by the HMP preserve manager or qualified biologist retained by the city at the end of the year during which the treatment activities took place.
- f. Living, non-native plant species coverage at the location of the treatment area must be demonstrated not to exceed 10 percent of the total treatment area.
- g. If coverage exceeds 10 percent, then at the direction of the HMP preserve manager, the treatment activities shall be repeated the following year.

In some situations, herbicides may still be used to remove these plants. This occasional use of herbicides would not contribute a potentially significant impact to the existing watershed.

- N-10 The comment states that trails should not inhibit wildlife movement with fences and other manmade structures. Trail 9A, Sunny Creek Road, is a trail that would be constructed by private development, and would be a Type 2 recreational trail, as described in Table 2 of the IS/MND. This trail is surrounded by development on the northwest and southeast, and is bounded by El Camino Real, a primary arterial roadway, on the southwest. Development of this trail would likely be along a road that would be included in a future proposed private development, and is therefore unlikely to be used as a wildlife corridor. However, if the project-specific biological analysis determines that this area could contribute to a functioning wildlife corridor, then design features that accommodate wildlife movement would be considered for the project, such as lighting restrictions, split-rail fencing, smooth-wire fencing, natural screening (i.e., boulders, native shrubs), or in some cases, restrictions on all types of linear fencing or screening.
- N-11 The comment reiterates that more information is need before a negative declaration of environmental impacts can be made. Please see response N-7.

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Monday, April 10, 2017 9:27 AM
To: Joanne Dramko; Bill Vosti
Cc: Kasia Trojanowska
Subject: FW: Comments on the Draft Trails Master Plan

Good morning Joanne and Bill,

Since the comment below is in regard to the draft Trails Master Plan and not the environmental document do we need to officially comment? I'll check with management at the city and see how they want to handle this. I would like to know how you have handled a situation like this before.

Thanks,

From: Pam Drew
Sent: Monday, April 10, 2017 7:38 AM
To: Kasia Trojanowska
Subject: FW: Comments on the Draft Trails Master Plan

fyi

From: Bob Steuernagel, Sr. [<mailto:steuernagel@sbcglobal.net>]
Sent: Friday, April 07, 2017 6:23 PM
To: Pam Drew
Subject: Comments on the Draft Trails Master Plan

Comments on the Draft Trails Master Plan

I am a regular user of the city's trails and a part-time employee of the Carlsbad City Library.

I am a senior and enjoy walking the trails with my 10-year-old grandson. We enjoy the natural wildlife as well as the exercise.

Size and Connection of Trails and Open Spaces

- O-1 I have noticed that the trails are not very busy even at peak times like midday weekends. There does not seem to be any reason to increase the trails or open spaces.
- O-2 The plan seems to indicate that there is a benefit to having more open spaces than nearby communities. This should not be a planning consideration. If there is sufficient open space, having more space than surrounding communities does not make it better. This is not a competition for area cities to brag about their superlatives. While competitive superiority in facilities helps economic growth as a benefit to the city in general, it does not help the citizens who already live and work here.
- O-3 I live near the location of the Poinsettia fire 3-4 years ago. The existence of too much connected open space is a prime reason for the spread of the fire. This consideration alone should preclude expansion of open space and preclude connecting open spaces.

Trail Improvements

O-4

Trails do not need to connect to make hikes longer. Citizens can walk multiple trails and travel between them. If they are long enough to require bathrooms, bathrooms will just become magnets for the homeless and vandalism. I do not understand any reason why someone would walk a trail at night that needs lighting. I carry a bag for my own litter and litter that I find. My grandson enjoys picking up litter. We do not need trash receptacles.

O-5

There is no need to design trails for special uses like pets and bicycles, unless they get crowded. We have encountered bicyclists regularly at Calaveras Park without incident.

Robert Steuernagel

7279 Surfbird Circle

760 804-9773

steuernagel@sbcglobal.net

Letter O – Robert Steuernagel, April 7, 2017

O-1 The commenter observes that existing trails are not very busy, even during peak times, and questions the need for more trails and open spaces. The need for increased trail connectivity was identified through the community driven Envision Carlsbad process conducted from 2008 to 2010. Envision Carlsbad resulted in a vision for the community based on nine core values. Three of these values are directly related to the city trails:

- Access to recreation and active healthy lifestyles;
- Walking, biking, public transportation and connectivity;
- Neighborhood revitalization, community design, and livability.

Subsequently, the Open Space, Conservation and Recreation Element of the Carlsbad General Plan (2015) identified a need to provide a comprehensive Carlsbad Trails Master Plan to address diverse user groups and trails connectivity.

O-2 The comment states that having more open space than nearby communities should not be a planning consideration. Community support for open space is consistently high among Carlsbad residents over the years. Open space and trails provide an opportunity for walking and biking short distances from homes and hotels, which benefit our health, environment, and social connectivity. Open space is set aside to protect valuable habitat for wildlife and recreation. Protection of these natural resources is a high priority of residents, as reflected in the Community Vision:

- Prioritize protection and enhancement of open space and the natural environment. Support and protect Carlsbad’s unique open space and agricultural heritage.
- Promote active lifestyles and community health by furthering access to trails, parks, beaches and other recreation opportunities.

O-3 The comment points to the 2014 Poinsettia Fire as a peril of having too much connected open space. Multiple factors contribute to setting conditions for the spread of urban wildfires: the health and amount of vegetation, prolonged drought conditions, low humidity, high temperatures and high wind, as was experienced in the Poinsettia Fire. Residents and businesses not only value open space, but their personal safety and economic well-being as well. The City of Carlsbad works to ensure that these community values are not mutually exclusive. Careful land use planning, diligent enforcement of building and fire safety codes, effective land and brush management, proactive emergency response planning and close coordination among local, state and federal safety agencies, all work together to mitigate threats to life and property when events such as the Poinsettia Fire do occur.

O-4 The comment objects to various trail amenities and facilities such as restrooms, safety lighting, and trash receptacles as unnecessary and as magnets for vandals and the homeless. As mentioned previously, a majority of residents responded that trail connectivity is one of the highest priorities. A network of trails can support alternative modes of transportation and reduce dependence on motorized vehicles, thereby reducing traffic, greenhouse gas emissions and the need for additional parking. The option for trail lighting is anticipated only for a Type 5 Multi-Use Trail which is typically associated with urban areas, such as Carlsbad Boulevard, where trail use is still high after sunset. Bathrooms are an optional amenity, considered on case by case

basis. Trash receptacles are typically installed at trail heads so they can be easily accessed by trash collection crews. The quantity and location of trash receptacles are based on the location of trailheads and the intensity of trail use. Whatever amenities are included in a given trail, the city acknowledges that proper maintenance and consistent enforcement of trails rules is vital to a successful trails system.

- O-5 The comment states there is no need to design trails for special uses like pets and bicycles. As described in the Trails Master Plan, nearly all of the trails in the City of Carlsbad are multi-use which means they accommodate hikers, joggers, on-leash dogs and bikers. It is important, however, that an effective trails system accommodate a variety of user needs. By way of comparison, a local neighborhood street has very different functional needs than a freeway; even though both roadways convey vehicular traffic, they are designed very differently. The same goes for non-motorized trails: they would assume various design characteristics depending on their location and surrounding terrain, intensity of nearby activity, likely user groups, types of destinations being linked, etc.

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Thursday, May 04, 2017 7:53 AM
To: Kasia Trojanowska; Joanne Dramko; Bill Vosti
Subject: FW: New Trails Master Plan Feedback

Fyi...

From: Vickey Syage [<mailto:vickey.syage@gmail.com>]
Sent: Wednesday, May 03, 2017 11:25 PM
To: Pam Drew <Pam.Drew@carlsbadca.gov>
Subject: Fwd: New Trails Master Plan Feedback

Dear Ms. Drew,
I was just informed today that you should have been on this email list. I apologize.
Please add my email below to the Public Comments on Carlsbad's new draft Master Trails Plan.
Kindly,
Vickey Syage

Begin forwarded message:

From: Vickey Syage <vickey.syage@gmail.com>
Subject: New Trails Master Plan Feedback
Date: May 2, 2017 at 5:09:59 PM PDT
To: matt.hall@carlsbadca.gov, cori.schumacher@carlsbadca.gov,
Michael.Schumacher@carlsbadca.gov, Keith.Blackburn@carlsbadca.gov,
Mark.Packard@carlsbadca.gov
Cc: kevin.crawford@carlsbadca.gov, Chris Hazeltine
<Chris.Hazeltine@carlsbadca.gov>, Mike Pacheco <Mike.Pacheco@carlsbadca.gov>,
kasia.trojanowska@carlsbadca.gov

Dear Mayor, City Council, City Manager, and Staff:

I am a concerned citizen and a Carlsbad taxpayer.

The new version of the Carlsbad Trails Master plan provides little details to priorities, timing, plans, goals, and vision for Carlsbad residents. It appears to be more like a framework for developers and other sources to provide funding to potential projects. That's not helpful to us residents. In addition to the information provided in all the new plan documents, my family and I would like to see:

P-1

P-2 []

- ○ A prioritized list of trails projects for Carlsbad to include timeframes, budgets and funding sources for those prioritized projects.

P-3 []

- ○ Quantifiable trails goals, such as “Add one mile of trails to the existing trail system each fiscal year for the next 20 years.”

P-4 []

- ○ A plan for the specific spending of the \$5 million allocated for Open Space and Trails by Proposition C in 2002.

P-5 []

As taxpayers, we would like to see our trail system expanded and expect a plan to show us how we’re going to get there. This new Master Trail Plan, as written doesn’t do that for us. It is incomplete.

Respectfully,

Vickey Syage

Letter P – Vickey Syage, May 3, 2017

P-1 The comment introduces several concerns that are itemized below, and states that the plan appears to be more like a framework for developers and others to provide funding to potential projects. The City of Carlsbad Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

Vision: Trails should provide options for walking, hiking, running, and biking that support community connectivity, sustainable transportation, and access to open space- all while encouraging healthy lifestyles, social interaction, appreciation of natural processes, support for economic vitality and connections to neighborhoods, businesses, and popular destinations.

Goal 1: Create a Connected and Complete Trails System

Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Goal 3: Identify Existing and Future Trail Development

Goal 4: Integrate Transportation Related Facilities as Part of the Trails System

P-2 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets and funding sources for the prioritized projects. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

P-3 The comment requests that the TMP contain quantified objectives by which to measure progress in trail construction. Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

P-4 The comment requests that the TMP specifically call for expenditure of General Fund money as authorized by voters' 2002 passage of Proposition C. (Commenter inadvertently identified it as Proposition D, an open space measure passed in 2006 unrelated to trails funding). Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

P-5 The comment is a concluding paragraph stating that the TMP is incomplete in its current form. The comment is noted, and the reader is referred to responses P-1 through P-4 above regarding the purpose, structure and content of the Trails Master Plan.

From: Kris Wright <kriswrt222@gmail.com>
Sent: Friday, May 05, 2017 4:23 PM
To: kenvi.crawford@carlsbadca.gov; Chris Hazeltine; Mike Pacheco; Kasia Trojanowska; City Clerk
Subject: Master Trails
Attachments: Letter Master Trails 050517.docx

Attached is my signed letter. I understand the deadline is at 5pm today.

thank you.
Kris

--
Kris Wright
kriswrt222@gmail.com

Office of City Clerk
City of Carlsbad
1200 Carlsbad Village Dr.
Carlsbad, CA 92008

May 5, 2017

Re: Master Trails

To whom it may concern:

Q-1 []

I was glad to see the new version of the Carlsbad Master Trails published recently. I truly believe that our trails system is essential to our daily lives and of course encourages us all to enjoy our beautiful weather.

Q-2 []

I was, however hoping to see more details with the Master Plan, such as a list of priorities and their funding sources. I do know that with Prop C there is allocated approx. \$5M in order to complete our trail system.

Q-3 []

As a citizen of Carlsbad, I would like to see a detailed report as to which trails would be funded and their timeframes along with a goal for each year. In addition, I would like to see our current balance of our Prop C money so that we can prioritize our trail system, for example connect two segments or provide trails in a quadrant that is especially in need.

Q-4 []

Q-5 []

I believe the Carlsbad Master Trails plan will include an area near my house, which is the Kelly Dr. and Agua Hedionda trail extension. It would be nice to know the cost and the timeline involved. This helps me know as a citizen, where our money is allocated and plans for the future.

Thank you.

Kristine Wright
4902 Via Arequipa
Carlsbad, CA 92008

Letter Q – Kristine Wright, May 5, 2017

- Q-1 The comment expresses the commenter’s pleasure at seeing the release of the draft TMP and belief that a trails system is essential to our daily lives. The comment is noted.
- Q-2 The comment requests that the plan include more information regarding prioritization and funding sources for trails. Commenter also notes her understanding that approximately \$5 million has been allocated to complete the trails system, as authorized by Proposition C.

Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers’ best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it’s in the taxpayers’ best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

- Q-3 The comment requests that the TMP include goals as to when trails would be completed. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for

public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules. Please also see response to comments Q-2.

Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

- Q-4 The comment reiterates a desire to use Proposition C authority to prioritize trails development. Please see response to comment Q-2.
- Q-5 The commenter requested information about planned trails near her home. Trails in the vicinity of Agua Hedionda are part of the Subarea 7, described in Chapter 4 Trail Network. Individual future connections are identified and described in Chapter 5 Trail Development Implementation Plan. Also see response to comments Q-2 and Q-3.

From: Kevin Crawford
Sent: Thursday, May 04, 2017 8:31 PM
To: Marisa Lundstedt <Marisa.Lundstedt@carlsbadca.gov>; Chris Hazeltine <Chris.Hazeltine@carlsbadca.gov>
Subject: Fwd: TMP

FYI

Sent from my iPhone

Begin forwarded message:

From: J Cannon <blancofelis@earthlink.net>
Date: May 4, 2017 at 8:28:38 PM PDT
To: Matt.Hall@carlsbadca.gov, Keith.blackburn@carlsbadca.gov, Cori Schumacher <cori@corischumacher.com>, Michael Schumacher <Michael.schumacher@carlsbadca.gov>, Mark.Packard@carlsbadca.gov, Kevin.crawford@carlsbadca.gov, chris.hazeltine@carlsbadca.gov
Subject: TMP

Dear Mayor, City Council, City Manager and Staff—

R-1 [The revised Trails Master Plan is full of wonderful ideas and vision—many of the things I have been wishing for Carlsbad for many years are included. A more extensive connected trails system, safer dedicated bike lanes and trails, and to keep open space a priority for creating a beautiful backdrop to the wonderful Carlsbad lifestyle.

R-2 [I did not have a driver's license until I was 30 years old. I preferred to ride a bike to work and to generally get around the county on my time off. With increasing density and ensuing higher traffic levels, as well as increased distracted driving due to cell phone use, I chickened out after having a several close brushes with oblivious and aggressive drivers. I hung up my bike and got a driver's license and never got back in the saddle again. I miss the rides and the fitness level that biking provides—but I believe the roads are too dangerous to ride anymore. At the rate things are going, I believe I will be an long gone before the Coastal Rail Trail system ever connects our coastal cities, or that Carlsbad will ever have any truly safe dedicated bikeways around town.

R-3 [I do a lot of walking and again find that there are few trails off the main roads that actually go anywhere that I need or want to go, or don't have to get into a car to get to a trailhead.

Am always amazed that in traveling to cities in most every state of the union, I find many

R-3
cont.

enviable urban trail systems that allow bicyclists and pedestrians to safely get to work, go into town for fun, and get to outer park systems, away from the main drag...and I always wonder why we—a city in a year-round sunny climate—lack similar alternative meaningfully interconnecting avenues.

R-4

It frustrates me when year after year, the subject gets discussed but no actual City plan ever gets implemented that creates any real system of citywide interconnected trails and destinations. Why is this such a low priority? Why is the City refusing to use the money that citizens voted to use for open space and trails?

R-5

We are so behind, nationwide, as a city when it comes to planning and actually creating practical, safe, interconnecting pathways for those who would prefer to walk or bicycle.

R-6

What can we do as citizens to encourage the City of Carlsbad to take this vision seriously and not feel that it--as well as setting aside open space--is a matter to be handed off to developers?

Respectfully,
Janell Cannon

Letter R – Janell Cannon, May 4, 2017

R-1 The comment is an introductory expression that the TMP contains wonderful ideas and vision for providing a more extensive connected trails system, improving bike and pedestrian safety, and keeping open space as a priority. No response is necessary.

R-2 The comment states that roadways have become too dangerous for cyclists because of higher traffic levels and distracted and aggressive drivers. The comment also laments that it will take too long to realize the vision for a completed Coastal Rail Trail and to have truly safe, dedicated bikeways around town. Table 5.2 Trail Implementation Summary provides an estimated implementation date for each trail segment including Coastal Rail Trail.

Per the General Plan Mobility Element (2015), the community’s vision includes better pedestrian and bicycle connections between neighborhoods, destinations and different parts of the community; and a balanced transportation system rather than a singular focus on automobile movement. A livable streets vision is a fundamental shift in how the city will plan and design the street system – recognizing the street as a public space and ensuring that the public space serves all users of the system (elderly, children, bicycles, pedestrians, etc.) within the urban context of that system (e.g. accounting for the adjacent land uses). Admittedly, this will take time, and the TMP represents an important advance toward realizing this vision.

R-3 The comment notes that there are few trails off the main roads that actually go anywhere, unlike what commenter has experienced elsewhere in the country. The Trails Master Plan has been developed in response to similar observations. The focus of the Trails Master Plan is to recommend additional trail links that will help to complete the trail network that has been steadily increasing in mileage and functionality. Accommodating a variety of trail users in a safe and environmentally sensitive manner; identifying existing and future trail development; and integrating transportation related facilities as part of the trails system are key components of the plan.

R-4 The comment expresses frustration at what appears to be a low priority for constructing trails, even when voters have authorized the expenditure of such. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: The City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

- R-5 The comment reiterates that the City of Carlsbad is way behind other communities when it comes to planning and constructing interconnected pathways. Please see response R-2 above.
- R-6 The comment asks, what can citizens do to encourage the city to take seriously the vision for better trail connectivity and open space? One way is that citizens can advocate for the approval and implementation of the Trails Master Plan. Once the Trails Master Plan is approved, city staff will utilize it to make budgeting and capital funding recommendations, prioritize the construction of identified trail segments, and manage the citywide trails system to ensure its future availability and sustainability for the community.

From: Chris Hazeltine
Sent: Friday, May 05, 2017 12:51 PM
To: Kyle Lancaster; Kasia Trojanowska
Subject: FW: Trails

Fyi..

From: Ronee Kozlowski [<mailto:Ronee7@aol.com>]
Sent: Friday, May 05, 2017 12:49 PM
To: Chris Hazeltine <Chris.Hazeltine@carlsbadca.gov>
Subject: Trails

S-1 [] Dear Mayor, City Council, City Manager, and Staff:
I am a concerned citizen and a Carlsbad taxpayer.
The new version of the Carlsbad Trails Master plan provides little details to
priorities, timing, plans, goals, and vision for Carlsbad residents. We would like
to see:
S-2 [] A prioritized list of trails projects for Carlsbad to include timeframes, budgets and
funding sources for those prioritized projects.
S-3 [] Quantifiable trails goals, such as "Add one mile of trails to the existing trail
system each fiscal year for the next 20 years."
S-4 [] A plan for the specific spending of the \$5 million allocated for Open Space and
Trails in Measure C in 2002.
S-5 [] As taxpayers, we would like to see our trail system expanded and expect a plan to
show us how we're going to get there.

Kindly,

Ronee Nicholson

Sent from my iPad

Letter S – Ronee Kozlowski Nicholson, May 5, 2017

S-1 The comment introduces several concerns that are itemized below, and states that the plan appears to be more like a framework for developers and others to provide funding to potential projects. The City of Carlsbad draft Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

Vision: Trails should provide options for walking, hiking, running, and biking that support community connectivity, sustainable transportation, and access to open space- all while encouraging healthy lifestyles, social interaction, appreciation of natural processes, support for economic vitality and connections to neighborhoods, businesses, and popular destinations.

Goal 1: Create a Connected and Complete Trails System

Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Goal 3: Identify Existing and Future Trail Development

Goal 4: Integrate Transportation Related Facilities as Part of the Trails System

S-2 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets and funding sources for the prioritized projects. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

S-3 The comment requests that the TMP contain quantified objectives by which to measure progress in trail construction. Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

S-4 The comment requests that the TMP specifically call for expenditure of General Fund money as authorized by voters' 2002 passage of Proposition C. Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: The City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

S-5 The comment is a concluding paragraph stating that taxpayers want their trails system expanded and that the TMP needs to show how to get there. The comment is noted, and the reader is referred to responses S-1 through S-4 above regarding the purpose, structure and content of the Trails Master Plan.

From: Chris Hazeltine
Sent: Friday, May 05, 2017 12:37 PM
To: Kyle Lancaster; Kasia Trojanowska
Subject: FW: Trails Master Plan

Fyi...

From: Hope Nelson [<mailto:hopen51@att.net>]
Sent: Friday, May 05, 2017 12:35 PM
To: Chris Hazeltine <Chris.Hazeltine@carlsbadca.gov>; Mike Pacheco <Mike.Pacheco@carlsbadca.gov>; Kasia Trojanowska <Kasia.Trojanowska@carlsbadca.gov>; Cori Schumacher <Cori.Schumacher@CarlsbadCA.gov>; Keith Blackburn <Keith.Blackburn@carlsbadca.gov>; Manager Internet Email <Manager@CarlsbadCA.gov>; Mark Packard <Mark.Packard@carlsbadca.gov>; Matthew Hall <Matt.Hall@carlsbadca.gov>; Michael Schumacher <michael.schumacher@carlsbadca.gov>
Subject: Trails Master Plan

Dear Mayor, City Council, City Manager and Staff:

- T-1 As a concerned citizens and voters in Carlsbad, we are concerned about the Carlsbad Trails Master Plan.
 We are gratified to see trails as outlined in the 85/15 Plan as well as the Citizens' plan presented in June 2016. We are dismayed that no priority level has been assigned along with no start/completion dates or cost estimates.
- T-2 As taxpayers and residents, we expect the Trails Master Plan to include a list of projects, priorities, budgets and timeframes. Carlsbad should have specifically assigned goals and the tools to measure progress and hold accountability. We expect to have a plan that shows
- T-3 explicitly and in easily understood terms, what the residents can expect.
- T-4 We hope to see our trail system expanded and expect to see a plan showing us how this will happen.

Sincerely,
Hope and Vincent Nelson
17 year residents of Carlsbad
760-804-1945

Letter T – Hope Nelson, May 5, 2017

T-1 The comment expresses gratification about seeing trails as outlined in the 85/15 Plan and the June 2016 citizens plan, but also concern that the TMP does not adequately prioritize trail development. Trail development is an opportunistic and flexible process. Prioritization of developing trail segments is based on several criteria, including: conditions of approval for private development, government transportation initiatives, funding for public projects (both local and regional), and construction by city staff and volunteers. Part of the trail within the Hub Park area could potentially be developed by the city as a capital improvement project, but access to the loop will have to be secured first from SDG&E. Part of the trail outside of the Hub Park area is conditioned by a private development. Upon City Council direction, staff may start the development of the trail within the Hub Park area.

T-2 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets, goals and tools to measure progress. Please see response to comment T-1 above.

Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

T-3 The comment states an expectation that the TMP should be explicit and easy to understand what residents can expect. See responses T-1 and T-2 above.

T-4 The comment expresses hope for an expanded trails system, and a plan for how it will happen. Chapter 4 Trails Network Subarea Recommendations and Chapter 5 Trail Development Implementation specifically address these needs.

From: rich breyer <rpbreyer@gmail.com>
Sent: Friday, May 05, 2017 9:51 AM
To: Matthew Hall; Keith Blackburn; cori.schumacher@carlsbaca.gov; Michael Schumacher; Mark Packard; Kevin Crawford; Chris Hazeltine; Mike Pacheco; Kasia Trojanowska
Subject: Trails Master Plan Concerns

Dear Mayor, City Council, City Manager, and Staff:

U-1

I am a concerned citizen and a Carlsbad taxpayer for over 30 years.

The new version of the Carlsbad Trails Master plan provides little details to priorities, timing, plans, goals, and vision for Carlsbad residents. We would like to see:

U-2

A prioritized list of trails projects for Carlsbad to include timeframes, budgets and funding sources for those prioritized projects.

U-3

Quantifiable trails goals, such as "Add one mile of trails to the existing trail system each fiscal year for the next 20 years."

U-4

A plan for the specific spending of the \$5 million allocated for Open Space and Trails in Measure C in 2002.

U-5

As taxpayers, we would like to see our trail system expanded and expect a plan to show us how we're going to get there.

Regards,
Richard Breyer

Letter U – Rich Breyer, May 5, 2017

U-1 The comment introduces several concerns that are itemized below, and states that the plan provides little details as to priorities, timing, plans, goals and a vision for the City of Carlsbad residents. The City of Carlsbad draft Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

Vision: Trails should provide options for walking, hiking, running, and biking that support community connectivity, sustainable transportation, and access to open space- all while encouraging healthy lifestyles, social interaction, appreciation of natural processes, support for economic vitality and connections to neighborhoods, businesses, and popular destinations.

Goal 1: Create a Connected and Complete Trails System

Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Goal 3: Identify Existing and Future Trail Development

Goal 4: Integrate Transportation Related Facilities as Part of the Trails System

U-2 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets and funding sources for the prioritized projects. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

U-3 The comment requests that the TMP contain quantified objectives by which to measure progress in trail construction. Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

U-4 The comment requests that the TMP specifically call for expenditure of General Fund money as authorized by voters' 2002 passage of Proposition C. Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

U-5 The comment is a concluding paragraph stating that taxpayers want their trails system expanded and that the TMP needs to show how to get there. The comment is noted, and the reader is referred to responses U-1 through U-4 above regarding the purpose, structure and content of the Trails Master Plan.

From: Michelle Breyer <michelle.breyer@smusd.org>
Sent: Thursday, May 04, 2017 4:29 PM
To: Matthew Hall; Keith Blackburn; Michael Schumacher; Kevin Crawford; Chris Hazeltine; Kasia Trojanowska; Cori.shumacher@carlsbadca.gov; Mark Packard; Mike Pacheco
Subject: Our city trail system

To Whom it May Concern:

V-1 Our family has been Carlsbad residents for 30 years. We are still waiting to get a comprehensive plan for the trail system in Carlsbad. In 2002 \$5 million dollars was allocated for our open trail system in Measure C. What has happened with that money and where are our trails?

V-2 The new version of the Carlsbad Trails Master plan is incredibly vague and does not give specific details about what will actually happen (or what should have happened over 10 years ago) It does not give any mention to timelines, lists of projects (prior, ongoing, or future), budgets, or funding sources. Similarly, when the trails and open space are brought up at council meetings we are brushed aside and told just to wait.

V-4 As citizens we would like to see a REAL comprehensive plan with specific and measurable information so that we can see where our hard earned tax dollars are going. We would like to see our open space and trails built AS VOTED ON IN 2002 and not constantly brushed aside for out of town developers looking to rezone and build where our precious open space trails FOR THE RESIDENTS AND TAXPAYERS belong.

V-5 Please begin taking this matter seriously and produce a real plan, with real projects, real timelines, and real budgets. Both of the "parks" designated to be built by my house prior to 2013 have been shelved....the same way the trails have been treated. Please start working for the residents and their priorities instead of greedy out of town developers.

Sincerely,

Michelle Breyer
5213 Milton Road
Carlsbad, CA 92008

Letter V – Michelle Breyer, May 4, 2017

V-1 The commenter states that her family has been residents for 30 years and are still waiting for a comprehensive trails plan. The comment also asks about what has happened since passage of Proposition C. The TMP is intended to be the comprehensive planning document for the citywide trails system. The vision and goals for the plan are laid out in Chapter 2. The TMP analyzes existing conditions, challenges and opportunities (Chapter 3); describes the recommended trails network in detail (Chapter 4); identifies an implementation schedule that estimates cost, timing, and entities responsible for trail construction (Chapter 5); specifies construction standards for the various trail types and related amenities (Chapter 6 and Appendix A); provides guidelines for trail operations, maintenance, safety and enforcement (Chapter 7 and Appendix B); and identifies existing and potential funding sources for trails development (Chapter 8).

Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

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V-2 The comment characterizes the plan as incredibly vague and does not provide details about what has happened or will happen for trails. The TMP identifies existing trails as well recommended future trails. Please see response to comment V-1 regarding the content of the TMP.

V-3 The comment states that the plan does not mention timelines, list projects, budgets or funding sources. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules. Please see response V-1.

V-4 The comment calls for a plan that contains the information described in comments above. Please see responses V-1, V-2 and V-3.

V-5 The comment urges that trails planning and implementation be taken seriously and not “shelved” as two [unspecified] planned parks were near commenter’s house. See responses V-1 through V-3 above.

----- Forwarded message -----

From: Kevin Crawford <Kevin.Crawford@carlsbadca.gov>

Date: May 4, 2017 6:50 PM

Subject: Fwd: Proposed Trails Master Plan

To: Marisa Lundstedt <Marisa.Lundstedt@carlsbadca.gov>, Chris Hazeltine <Chris.Hazeltine@carlsbadca.gov>

Cc:

Sent from my iPhone

Begin forwarded message:

From: Harry Peacock <bhpeacock@att.net>

Date: May 4, 2017 at 6:30:22 PM PDT

To: "kevin.crawford@carlsbadca.gov" <kevin.crawford@carlsbadca.gov>

Subject: Fw: Proposed Trails Master Plan

Reply-To: Harry Peacock <bhpeacock@att.net>

Harry R. Peacock

On Thursday, May 4, 2017 6:28 PM, Harry Peacock <bhpeacock@att.net> wrote:

W-1

I recently read over the draft Trails Master Plan which I understand needs to have feedback to the City no later than close of business tomorrow. Trying to read the Plan online is a real chore since the maps are so small and the color definitions so similar in many cases it is hard to determine just what kind of trail is going where. A lay person, ie the average citizen has to have a real problem trying to figure out what the city is proposing to do in a simple, straightforward, easy to understand way.

W-2

It seems the new version of the plan provides little in the way of detail into priorities, plans, goals, objectives and a vision which Carlsbad residents can easily relate to in terms of their desires for pedestrian trails and bicycle trails and routes through the city.

W-3

Any plan should contain a priority system of which trails should be developed in some order, which ones are more critical than others in order to connect various areas of the city and those which are designed primarily for neighborhood use.

W-4

The Plan should establish goals for trail additions and improvements in 5 year segments, ie. what is expected to be done in the next five years, then in the five years following that and so forth.

W-5

As I understand it in 2002 Measure C allocated some \$5 million for Open Space and Trails. The Plan should set forth how the \$5 million is being apportioned and what priorities with the available funding will be undertaken in each new five year target program.

W-6

Reciting a long history of the trails in Carlsbad may be nice but the space would have been better utilized to focus on how the new plan is going to further the network which was part of the original plan, how that network may have been modified or expanded over time, what conditions changed to require revisions and how the overall system is proposed to be fitted together to form a coordinated and connected system throughout the City.

W-7

No plan is of any use unless there is a straightforward statement on how the plan is going to be realized including identified funding and clear cut priorities.

W-8

I for one hope this new plan will do all of the above and will contain an executive summary of the plan and how it will be accomplished.

W-9

I moved to Carlsbad in the summer of 2000 because I truly believed that Carlsbad was a special place which had exhibited uniquely visionary thinking by its political leaders and a determination to create consensus on the important issues facing the City and how to resolve them. This is another opportunity for the political leaders of the City to demonstrate that that spirit is still alive and well in Carlsbad.

Harry R. Peacock
7434 Sundial Place

Letter W – Harry Peacock, May 4, 2017

W-1 The comment expressed concern over the readability of the TMP online, citing the small size of maps and colors made it difficult to distinguish the various trail types. Staff reviewed the online version of the TMP on the city’s website and found that, at reduced scales some of the smaller figures and the composite trails map could be difficult to read on a computer screen. The image resolution was good, and map colors were easy to distinguish, in the TMP.

Many readers find it easier to read documents in print. During the public review period, printed copies of the TMP were made available for purchase at the City of Carlsbad’s Planning counter located at the Faraday Center. Additionally, print copies of the plan were distributed to city facilities including City Hall, Senior Center, and the libraries, and are still available for viewing free of charge. The documents available on the website are in .pdf format, allowing for download and printing.

W-2 The comment states that the plan contains little detail as to priorities plans, goals objectives and vision for pedestrian and bicycle trails. The City of Carlsbad draft Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

Vision: Trails should provide options for walking, hiking, running, and biking that support community connectivity, sustainable transportation, and access to open space- all while encouraging healthy lifestyles, social interaction, appreciation of natural processes, support for economic vitality and connections to neighborhoods, businesses, and popular destinations.

Goal 1: Create a Connected and Complete Trails System

Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Goal 3: Identify Existing and Future Trail Development

Goal 4: Integrate Transportation Related Facilities as Part of the Trails System

Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

- W-3 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets and funding sources for the prioritized projects. Please see response to comment W-2 above.
- W-4 The comment requests that the TMP contain quantified objectives by which to measure progress in five-year increments. Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.
- W-5 The comment requests that the TMP set forth how expenditure of General Fund money as authorized by voters' 2002 passage of Proposition C will take place. Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

- W-6 The comment states that space devoted in the plan to recounting the history of trails planning would be better devoted to explain how the city will further the trails network as originally

intended. Section 1.5 Local Planning Efforts will be expanded to include a narrative focusing on expansion of the trail network over the years.

- W-7 The comment states the plan needs to identify funding and clear-cut priorities. Chapter 5 Trail Development Implementation Plan, includes descriptions of each individual project, estimated project cost and development entity. Table 5.2 Trail Implementation Summary, also provides an estimated implementation date for each trail segment. Funding sources are discussed in Chapter 8 Funding Opportunities.
- W-8 The comment requests that the final plan contain an executive summary. An Executive Summary will be added to the final TMP.
- W-9 The comment states commenter's belief in the special nature of the City of Carlsbad and its visionary, consensus-building leadership on important issues. The TMP is an opportunity to demonstrate that spirit is alive and well in the City of Carlsbad. The comment is noted.

From: Pam Drew <Pam.Drew@carlsbadca.gov>
Sent: Thursday, May 04, 2017 7:50 AM
To: Kasia Trojanowska; Joanne Dramko; Bill Vosti
Subject: FW: Trails Master Plan

Fyi...

From: Jan Bandich [<mailto:bandich@att.net>]
Sent: Wednesday, May 03, 2017 10:25 PM
To: Pam Drew <Pam.Drew@carlsbadca.gov>
Subject: Trails Master Plan

Dear Ms. Drew,

I am a concerned citizen and a Carlsbad taxpayer. I love that Carlsbad is dedicated to providing access to trails and nature and a healthy lifestyle. I eagerly read through the Trails Master Plan to see what was planned and to anticipate a schedule of completion on the trails around the Agua Hedionda Lagoon and the proposed Hub Park on the South Shore.

X-1 I was disappointed to find that the updated version of the Carlsbad Trails Master Plan provides little details as to priorities, timing, plans, goals, and vision for Carlsbad residents. I would think a city with eager developers and lots of tourists would generate enough income that a portion could be dedicated to line item budgets to complete these projects. We would like to see a practical approach to making the wish list a reality with:

- X-2 • A prioritized list of trails projects for Carlsbad which includes time frames, budgets, and funding sources for those prioritized projects.
- X-3 • Quantifiable trails goals, such as "Add one mile of trails to the existing trail system each fiscal year for the next 20 years."
- X-4 • A plan for the specific spending of the \$5 million allocated for Open Space and Trails in Measure C in 2002.

X-5 As taxpayers, we would like to see our trail system expanded and expect a plan to show us how we're going to achieve it.

Cordially.

Jan Bandich

May you always have: Love to share, Friends who care, and Health to spare.

Letter X – Jan Bandich, May 3, 2017

X-1 The comment introduces several concerns that are itemized below, and states that the plan provides little details as to priorities, timing, plans, goals and a vision for City of Carlsbad residents. The City of Carlsbad draft Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

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Goal 1: Create a Connected and Complete Trails System

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X-2 The comment requests that the TMP contain a prioritized list of trail projects to include timeframes, budgets and funding sources for the prioritized projects. Completion of the citywide trails system will occur over time through a combination of city-led and city-funded capital projects, as components of other public agency projects, and through conditions of future private developments. TMP Chapter 5, Trail Development Implementation Plan, includes descriptions of each individual trail project, estimated project cost and development entity. Table 5.2, Trail Implementation Summary, also provides an estimated implementation date for each trail segment.

X-3 The comment requests that the TMP contain quantified objectives by which to measure progress in trail construction. Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

X-4 The comment requests that the TMP specifically call for expenditure of General Fund money as authorized by voters' 2002 passage of Proposition C. Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: the City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C. It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

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X-5 The comment is a concluding paragraph stating that taxpayers want their trails system expanded and that the TMP needs to show how to get there. The comment is noted, and the reader is referred to responses X-1 through X-4 above regarding the purpose, structure and content of the Trails Master Plan.

RECEIVED

MAY 04 2017

CITY OF CARLSBAD
PLANNING DIVISION

May 4, 2017 Public Comments on Trails Master Plan

Y-1

This TMP should provide the details to help the State move forward with opening trails in the Buena Vista Ecological Reserve. Access to BV Creek and signage for bird nesting should be provided.

Y-2

Y-3

There is heavy use by bikers, hikers, birders and dog walkers on MANY trails in the Carlsbad Highland Ecological Reserve. Work with the state to show which ones are to be allowed and which ones closed.

Y-4

Please evaluate between the west edge of Alga Norte Park and the Western La Costa Preserve for a nature trail.

Y-5

Dog stations should be provided where Power line easements meet roads.

Find attached petitions signed by 149 regular users of Village H trail 5b for off leash dog walking. This historic use should be grandfathered into the TMP. Off leash dog walkers are an "unserved population" of residents and visitors. Many of our large hotels, timeshares and vacation rentals now allow dogs. This unrecognized user group should have accommodation in our City and this should be included in the update of the Trails Master Plan (TMP).

Benefits for designating existing trail 5b for off leash dogs:

Y-6

- Creates a "sense of community" that is intrinsically linked to this special place. A central gathering place where people of all ages and their dogs intermingle and develop friendships. People who live alone or lack a social network come here for meaningful human interaction, which is a key aspect of a healthy lifestyle.
- Reduces pressure from off leash dogs on sensitive habitat, like Lake Calavera, Carlsbad Highlands Ecological Reserve and BVCER.
- Dogs in fact are less aggressive off leash, they are happier, they socialize better, they exercise more and so do their owners.
- Dog use occurs only during daylight hours so the adjacent wildlife corridor will continue to remain unaffected.

1/210

Y-6
cont.

- Volunteer folks from S.P.O.T (Saving Pets One at a Time) dog rescue brings groups of dogs here in non-peak mid-morning hours.
- The shade of the eucalyptus trees along the trail make this area usable on the hottest of summer day. We maintain this trail.
- The trail is a unique "lap", formed over many years that enables folks to walk for miles. Most dogs are under voice control.
- Reduces Cities carbon footprint because people walk there that might otherwise be driving to areas or cities to meet this need.

Many aspects (listed below) of the TMP, General Plan and Community Vision would be met by designating this existing half mile trail at 5b an off leash dog walking area, as it has been historically used for.

General Plan: Open Space & Conservation Element (2006) A.3 - An open space system that improves the quality of life for the citizens of Carlsbad and provides a variety of Open Space.

3.p.24 Update TMP to reflect changes in need, opportunities & priorities

4.p.40 Multi-Use Ensure that the trail network provides appropriate amounts of resources for each trail type of user group.

4.P.42 - Locate multi-use trails and associated amenities and passive recreational features to minimize impacts to sensitive habitats and other sensitive surrounding land uses, such as residences.

TMP Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Objectives:

Continue to develop multi-use trails that support a variety of users.

2.1.A Vision for the Future ...Supports Community Connectivity and access to O.S., Social Interaction

Goal 3: Identify Existing & Future Trail Development

2.2 Ultimately, the TMP is addressed to residents and visitors of the City of Carlsbad, taking under consideration needs and preferences of the community. Its success is based on the public's input, which is achieved through the public outreach process. Public outreach was conducted in the early stages of the master planning process for this TMP.


22% of online survey respondents want more trails and open space. Many people would like to walk their dogs off leash, we have an area where this occurs, the TMP needs to reflect this.

Kasey Cinciarelli 2727 Lyons Ct., Carlsbad, CA 92010

Kasey Cinciarelli

760.496.8522

kinciarelli@roadrunner.com

2/10 

~~20~~ OFF Leash Advocates, xlsx page 1/8

NOTE: these are 2 sided copies ★

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

NAME STREET ADDRESS EMAIL

1. Kasuy Cinciarelli Lyons ct kcinciarelli@roadrunner.com
2. Tay Cooper 3485 Ridgecrest Dr taycooper@yahoo.com
3. Dana Shepard danashpard@yahoo.com
4. Melissa Miller Pontiac Dr. sckidtx@gmail.com
5. Emma Hilbourn Stockton Pl ehilbourn@gmail.com
6. Jane Callan 2741 Victoria Ave jane.callan@yahoo.com
7. Rose Kant 2730 York Rd Parkside mommaspump@aol.com
8. Jane Horman 3014 Hawes Hill St jandorman@yahoo.com
9. Hilary Thomas 3411 Santa Clara Way hiltthomas06@gmail.com
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16. Renata Sobiewa 3691 Sienna Monna renata3631@gmail.com
17. Edison Wauke 2638 GLENVIEW DR Fickle Fire ^{Fire} ^{Chowder}
18. Ruby Lieu 4326 STANFORD ST CARLSBAD, CA 92010
19. Paul Housh 2460 CAPE LONCE CB 92016
20. Nicolle Witkatsky 4620 Buslingham Ct invisible.yahoo.com

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email
email

3/10 

23

page 2/8

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

	NAME	STREET ADDRESS	EMAIL
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22	Theresa Melton	2079 Sutter St	Theresa.Melton@yahoo.com
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24	Mike Ann	3466 Richfield Dr	gspk10@gmail.com
25	Brittany Karman	317 Forest Pt	brittany.karman@gmail.com
26	SILVIA MORGAN	4592 Granite Ct	
27	Mac Ann	3582 Granite Ct	
28	WOLFF	3648 Jelly Pt.	WOLFF@WOLHORN.CO
29	ANHORN	3648 Jelly Pt	ANHORN@WOLHORN.CO
30	REDACTED	2712 Almas Ave	LONSSON@LIVE.COM
31	THOMAS FR	3671 CELENDIA	
32	Bonni Agadoni	4721 Galeshead	agadoni@att.net
33	Sotti Donohue	4729 Galeshead	sottid@earthlink.net
34	PETER YATEJ	3618 CHESTER AVE	PETER.YATEJ2@gmail.com
35	Samantha Jennings	3772 Portland Pt	tate006@usm.edu
36	Buckley Angus	4023 Peninsula Dr	YKang@comcast.net
37	Erin Jastrow	4023 Peninsula Dr	jastrow@comcast.net
38	J. Randall Davis	3515 Timberg Ct	jdavis@comcast.net
39	J. Bliss	4005 Trieste	
40	R.E. Bliss	4005 Trieste Dr. 92010	
41	Corey Avilla	4507 1352 Magnolia Ave, 92008	coreyavilla@yahoo.com
42	RACHEL FUNN	2702 Avalon Ave	rachfunn@yahoo.com

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29

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

NAME	STREET ADDRESS	EMAIL
43	Vigliardo's 3529 Hastings Dr Carlsbad	
44	Alan Lewis 4379 Corneil Dr Carlsbad	alan.lewis@carlsbadca.gov
45	Brigitte Lundrigan 141 Cape May Pl Carlsbad	BrigitteLundrigan@yahoo.com
46	Bryant 2832 Hillsboro Ct, CA	ianebryant@carlsbadca.gov
47	Frank 420	
48	Ann Truitt Celinda Dr. 9200	
49	Troy Beveridge 7313 Ap	
50	Jenna Bayl 2343 Lancaster	jennab@carlsbadca.gov
51	Angela Townsend 2844 Andover Ave	angela.townsend@carlsbadca.gov
52	Heather Rubiales 3912 Plateau Place Carlsbad 92010	
53	DAN GIBBIS 506 CORNELL DR CARLSBAD 92011	
54	Jennifer Collins 3215 Vincesado 92010	jcollins@carlsbadca.gov
55	Keri Paddock 3718 Bennington Court 92010	keri@paddockca.com
56	Trettin's 2759 Victoria Ave., 92010	
57	Houses 2836 Andover Ave 92010	
58	Nick + Dawn Muscolino 4371 Yosemite St 92010	
59	Frank + Lisa Kuntz 3530 Sibley Ct 92010	
60	Carlos Nussa 2943 Lexington Cir 92010	
61	MR. + MRS. LANGER 557 W. BOBIE DR 92083	
62	Galleisky 3640 Esplanade St Oside 92056	

5/10

page 4/8

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

over →

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63	Samantha Hayes 4619 Buckingham Ln	samloveschocolatecat@icloud.com
64	Christine Miller 3470 Catalina Carlsbad	cmillerca@icloud.com
65	Greg Campbell Point Reyes Lt Carlsbad CA	
66	Torin Campbell Point Reyes court	
67	Jackson Lewis Vancouver Street	
68	Michael Fullington CATALINA DR.	
69	Mella Webster Sierra	
70	Mark Beveridge 2398 Appian Rd.	markBeveridge@adobe.com
71	Cameron Hart 2740 Auburn Ave.	
72	Terrill Hart 2740 Auburn Ave.	
73	Bruce Gross Beannington Ct	
74	Georgy KAT 2770 York Rd	
75	Diana Sturiale 2742 Glasgow Dr	sturiale@att.net
76	TIM LEWIS 2661 Vancouver	
77	AL GALAVIZ 2675 Sutter	
78	Julie Fennell 4615 Buckingham Ln Carlsbad	
79	Kelly Kendall 4358 Rainier Way Oceanside	
80	Ryan Beveridge 2398 Appian	
81	Frank Tri 1799 Cottonwood Vista 92081	
82	JEFFREY HADLER 2408 GRANADA WAY	
83	FRANK HOPAN (CARLSBAD) CA 92010 4028 PENINSULA DR	
84	Tom Nogr's 3570 Sierra Moroni Ave 92010	
85	4983 Posieden way	stankatz@sbci.net

page 5/8

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

NAME	STREET ADDRESS	EMAIL
2 James Sturiale	2742 Esplanade Carlsbad, CA 92010	jimsturi@gmail.com
7 Paulette Phillips	4770 Getthead, CA 92010	paulettephillips29@gmail.com
8 Rob Lambert	2604 Winthrop	rlambert74@gmail.com
9 Jocelyn Rankema	5137 STEINBECK CT	jocier@gmail.com
10 Albert A Perkin	3020 Kingston St 92010	alperkin111@gmail.com
11 Amanda Gareis	606 Coral Reef Ave. 92011	Amandagareis@yahoo.com
12 Amber Kaufman	817 Camino Rosa 92011	Kaufman5sd@gmail.com
93. Rose Harris	2746 Auburn, CA 92010	rharris2746@gmail.com
94 Kristen Hart	2740 Auburn Ave. Carlsbad, CA	swarthart22@gmail.com
95	4653 Esplanade, Carlsbad, CA	stuartc@comcast.net
96	NIK-AUTENBERG	nik@autenberg.com
97. Sarah Brinley	3637 Wilshire Ave 92010	Sarahbrinley@gmail.com
98 Peggy Truxaw	2706 Medford Ct, 92010	p.truxaw@hotmail.com
99 Rudi Krenvert	1324 Palisades Dr, 92008	rudi.krenvert@hotmail.com
100 Laura Ember	1266 Stratford 92008	charliestin@yahoo.com
101	2007 PROVES 27... 92010	stott1234@gmail.com

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7/10 10/13

page 8/8

We Urge the Carlsbad City Council to Dedicate S. Side of Village H to OFF-LEASH Dog Area

NAME	STREET ADDRESS	EMAIL
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1/10/10 [Signature]

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page 7/8

9/10 

Letter Y – Kasey Cinciarelli, May 4, 2017

- Y-1 The comment requests that the TMP contain more detail to assist the state in opening trails in the Buena Vista Creek Ecological Reserve (BVCER). Staff has met with CDFW to review potential solutions that would be acceptable to the resource agencies. At this time, however, the area remains currently closed to recreational use, per CDFW regulations.
- Y-2 The comment called for access to Buena Vista Creek and signage for nesting birds. As stated in the previous comment, discussions regarding trail alignment is ongoing. Interpretive signage may be added as part of the trail design in the project development phase.
- Y-3 The comment notes that the Carlsbad Highland Ecological Reserve (CHER) is heavily used by bikers and hikers, and urges the city to work with the state to identify and limit access to authorized trails. The Trails Master Plan shows only one official trail (utility roadbed) in the CHER. The city is cognizant of the popularity of the ecological reserve for recreational use, and as stated above, staff are collaborating with the CDFW on the alignment and program for future trail use and trail closures.
- Y-4 The comment requests that the city evaluate the area between Alga Norte Park and western La Costa Preserve for a nature trail. There are paths through Alga Norte Park that allow for recreational walking/ jogging along the edge of the La Costa Preserve. There are no new trails anticipated within the area, since recreational needs are already met by existing park amenities. Furthermore, the La Costa Preserve is within the city's HMP Hardline Preserve, which would preclude trail development within this area without changing the boundaries of the preserve through an Equivalency Finding process with the wildlife agencies.
- Y-5 The comment states that dog stations should be provided where power line easements meet roads. Dog stations are provided at the utility roads that have been designated as public trails. Typically, they are installed at trailhead where they can be serviced by maintenance crews.
- Y-6 The comment advocates for designating Trail 5B (Village H) for off-leash dog walking. The future Village H Trail is proposed to be a multi-use Recreational Trail Type 2, which allows on-leash dogs, consistent with other trails within the City of Carlsbad.

Furthermore, the San Diego County Code of Regulatory Ordinances, Section 62.669, Restraint of Dogs Required, Subsection (b) (3), indicates:

San Diego County Code of Regulatory Ordinances, Sec. 62.669. Restraint of Dogs Required.

(a) A dog's owner or custodian or a person who has control of a dog shall prevent the dog from being at large, except as provided in subsections (b) and (d) below.

(b) A dog's owner or custodian who has direct and effective voice control over a dog to ensure that it does not violate any law, may allow a dog to be unrestrained by a leash while a dog is assisting an owner or custodian who is:

(3) On public property with the written permission of and for the purposes authorized by the agency responsible for regulating the use of the property.

The Carlsbad City Council has adopted by reference the San Diego County Code of Regulatory Ordinances, via Carlsbad Municipal Code Section 7.08.010. B, which reads:

Carlsbad Municipal Code, Sec. 7.08.010. Adopted by reference.

B. Title 6, Division 2, Chapter 6, of the San Diego County Code of Regulatory Ordinances, as amended by Ord. No. 10036 (N.S.), effective 2/26/10, relating to animal control, is adopted by reference and incorporated as part of this code, except that whatever provisions thereof refer to a County of San Diego board, territory, area, agency, official, employee, or otherwise it shall mean the corresponding board, territory, area, agency, official, employee, or otherwise of the city, and if there is none, it shall mean that the county is acting in the same capacity on behalf of the city. A copy of the referenced ordinance is on file in the city clerk's office.

To date, the City Council has not adopted exceptions to the above code sections for off-leash dogs on city trails. The City Council has also not expressed an interest in considering such exceptions, nor have they directed staff to pursue drafting ordinances that would provide such exceptions. Therefore, the revised draft of the City of Carlsbad Trails Master Plan does not account for trails that would allow for off-leash dogs.

From: Mike Pacheco
Sent: Tuesday, May 09, 2017 10:27 AM
To: Kasia Trojanowska; Kyle Lancaster
Subject: FW: Parks and trails plan.

Here you go!

From: Jodi Good [<mailto:goodjodi007@yahoo.com>]
Sent: Monday, May 08, 2017 5:02 PM
To: Mike Pacheco <Mike.Pacheco@carlsbadca.gov>
Subject: Fwd: Parks and trails plan.

Sent from my iPhone

Begin forwarded message:

From: Jodi Good <goodjodi007@yahoo.com>
Date: May 8, 2017 at 3:49:28 PM PDT
To: kevin.crawford@carlsbadca.gov
Subject: Parks and trails plan.

Dear Mr. Crawford,

The following is a copy of my letter to the City Council:

Z-1 [] This letter is concerning the General Parks and Trails Plan. General indeed! There are no cost estimates, priorities, time frames, and no planned projects. The so called "plan" needs to go back to the drawing board and include a list of planned trails, budgets, funding sources, and which parks and trails are of highest priority.

Z-2 [] I, along with many concerned Carlsbad citizens, voted for Open Space and Trails Measure C in 2002. Nothing has happened. The majority of people who voted for and against Measure A in 2016 wanted the "Hub" Trails on the south shore of Agua Hedionda opened. We even presented a specific trail plan for the south shore last year that was voted down by Council. Must we have near law suits filed in order to get parks (Buena Vista Reservoir) built? What happened to the monies set aside for open space and parks allocated by Measure C?

Z-3 []

Z-4 [] I have lived in Carlsbad nearly all of my life. As tax payer and longtime resident, I am asking for you to please come up with something more specific, more detailed. We need a great Parks and Trails Plan that enhances our wonderful city. We cannot and should not wait another 15-20 years.

Thank you for your consideration.

Jodi Pendry Good
2475 Jefferson #403
Carlsbad, CA, 92008
760.518.5017

Sent from my iPhone

Letter Z – Jodi Good, May 8, 2017

Z-1 The comment states that the TMP lacks cost estimates, priorities, time frames, and planned projects. The City of Carlsbad draft Trails Master Plan is intended to be a framework for how city trails will be developed and managed in the future. It was prepared in response to the General Plan Open Space, Conservation and Recreation Element (2015) that calls for a comprehensive Trails Master Plan that addresses:

- Locations of planned future trails
- Strategies to ensure residents have access to a diverse array of well-maintained trails today and for future generations

In turn, the draft Trails Master Plan Chapter 2 articulates a vision and set of goals for a future trails system:

Vision: Trails should provide options for walking, hiking, running, and biking that support community connectivity, sustainable transportation, and access to open space- all while encouraging healthy lifestyles, social interaction, appreciation of natural processes, support for economic vitality and connections to neighborhoods, businesses, and popular destinations.

Goal 1: Create a Connected and Complete Trails System

Goal 2: Accommodate a Variety of Trail Users in a Safe and Environmentally Sensitive Manner

Goal 3: Identify Existing and Future Trail Development

Goal 4: Integrate Transportation Related Facilities as Part of the Trails System

Trail development is an opportunistic and flexible process. Prioritization for developing trail segments is based on several criteria, including: conditions of approval for private and public development; government transportation initiatives; funding for public projects (both local and regional); and construction by city staff and volunteers. Trail segments that will be built by the city can be planned and developed as a capital improvement project, subject to budget approval. In another case, the I-5 Freeway North Coast Bike Trail is part of the Caltrans I-5 widening project, and its construction depends on the schedule for that project. Several other future links are conditioned to be constructed by private development and are dependent on those project schedules.

Z-2 The comment states that nothing has happened since voters passed Proposition C in 2002. Passage of Proposition C allowed the City Council to exceed the \$1 million General Fund spending limit on four projects: The City of Carlsbad Safety Training Center, a new swimming pool complex (Alga Norte Community Park), an extension of Cannon Road, and acquisition of open space and trails. Proposition C did not direct the City Council to spend a specific amount of money on open space and trails by a certain time. Instead, it provided voter authorization to spend more than the \$1 million limit if one or more properties become available and the City Council determines such acquisition for open space/trails purposes is in the taxpayers' best interest. Through the budgetary process as of Fiscal Year 2017-2018, the City Council set aside \$4 million from the General Fund specifically for open space acquisition and another \$1.3 million for trails planning and construction as authorized by Proposition C.

It is worth noting that since the passage of Proposition C, the city has acquired approximately 1,400 acres of open space without spending local taxpayer money. This was accomplished through partnerships with other governmental entities, development approvals for private land owners and non-profit organizations, relieving taxpayers of the cost to purchase and maintain natural open space.

In 2005, after passage of Proposition C, the City Council appointed the Open Space and Trails Ad Hoc Citizens Committee to establish and rank a list of potential acquisitions. Some of the property on that list has been acquired. The Ad Hoc Committee is no longer active, but the city regularly reviews available land – land identified by the committee and other land – to determine whether it's in the taxpayers' best interests to purchase it as open space. By agreement in March 2017, city staff and representatives from North County Advocates have committed to meet at least twice a year to discuss the status of acquiring properties listed in the Proposition C Open Space and Trails Committee Property Analysis ranking chart. Additionally, the city will consider other properties that may become available but are not on the ranked list, utilizing the criteria developed by the Ad Hoc Committee to evaluate their appropriateness for acquisition.

- Z-3 The comment expressed that there is strong support for a trail on the Hub Park lease site, and questions the disposition of Proposition C funding. The Trails Master Plan proposes a Type 2 recreational trail on the south shore of Agua Hedionda Lagoon (Trail Segment 7C). It will begin at the future I-5 bridge (proposed as part of the Caltrans I-5 widening project), extend along the upper bluff on the lagoon's south shore and terminate at Cannon Road's underpass. The trail alignment is diagrammatic and will be refined and verified in the project development phase. Part of the proposed segment loops within the Hub Park area which was leased from SDG&E in 1975 for a total of 99 years. The loop within the Hub Park area can potentially be developed by the City, but it requires a public access easement granted by SDG&E to allow access to the trail. Currently, Hub Park has no egress/ingress within city-managed land to allow for connectivity. Trail development can be conditioned by a private development partially or in whole, and will require further collaboration with adjacent property owners. Upon City Council direction, staff may start the development of the trail within the Hub Park area. Also, see response Z-2.
- Z-4 The comment is a concluding paragraph requesting that the plan be more specific and detailed. Please see responses Z-1 through Z-3 regarding the TMP's purpose, objectives, and content.