



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

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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

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

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

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).

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.

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

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.

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.

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

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.

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

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

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.

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.

## **Greenhouse Gasses**

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.

## **Trails Master Plan**

### **Chapter 1 Introduction**

- 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.

-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**

-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**

-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.

-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.

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

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.

-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 BVCER. 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

shown. We understand the concerns by the Wildlife agencies about the trails through the BVCER. 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 BVCER. Ignoring this will just make it worse- and result in more damage to the cultural, historic and natural resources of this valley.

- 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**

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

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.

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.

7A, 7F and 7 G – 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.

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.

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.

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.

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.

-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.

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.

-9G and 12A – Cost must be for entire road- not just the trail. Shouldn't this just include the trails portion of the costs?

- 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.

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

-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**

-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.

- 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.

-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.

-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**

-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.

-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.

-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.

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

## **Chapter 8 Funding**

-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. TAYLOR<sup>1</sup> AND RICHARD L. KNIGHT<sup>2</sup>**

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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).