

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use



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DEPARTMENT OF PLANNING AND LAND USE

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May 31, 2007

Bureau of Land Management, El Centro Field Office
Attn: Erin Dreyfuss, Acting Environmental Coordinator
1661 S. 4th Street,
El Centro, CA 92243

**Re: Comments on Bureau of Land Management Eastern San Diego County
Draft Resource Management Plan and Environmental Impact Statement**

The County of San Diego has received and reviewed the Bureau of Land Management (BLM) Eastern San Diego County Draft Resource Management Plan (RMP) and Environmental Impact Statement dated February 2007, and appreciates the opportunity to comment. In response to the document the County has comments that identify potentially significant environmental issues that may have an effect on the unincorporated lands of San Diego County.

The lands in BLM Planning Area that are under the jurisdiction of the County of San Diego are subject to planning efforts associated with the County's General Plan 2020 and the East County Multiple Species Conservation Program (ECMSCP) Plan. The County Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and Department of Parks and Recreation (DPR) staff have completed review of this document and offer the comments listed below.

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GENERAL PLAN 2020 ROAD NETWORK PLANNING

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1. As part of the County's General Plan 2020 update, road network planning for each unincorporated area community has taken place through an extensive public and stakeholder participation process. Road network planning has included identification of circulation element roads, road classifications, proposed road downgrades and upgrades, fire access roads and other minor and major roads for the communities located adjacent to the proposed BLM RMP boundaries.

It is important that planned road networks including construction, expansion, realignment, maintenance, or other improvement actions be recognized as allowed uses in the RMP. Maps and information identifying the existing and proposed County circulation networks within communities encompassing the RMP project area are available from SANGIS. Although the proposed road networks are not yet adopted, they should provide a general overview of the road network plans for communities within the RMP area. The following link is to the proposed Circulation Element (CE) Framework which identifies proposed CE Road Standards including the planned number of lanes, right of way widths and other standards proposed for each road classification (http://www.sdcounty.ca.gov/cnty/cntydepts/landuse/planning/GP2020/pubs/p_c_jul06/e.pdf - Summary Table 1).

2. The circulation and transportation items discussed in the RMP mainly pertain to internal roads and designations where off-road activity is permitted. However, development of individual off-road vehicle parks may necessitate the preparation of traffic impact studies at the time that the development is proposed if County roads are intended to be used to access the BLM park and/or recreation areas. Where the BLM land is located near the international border, roads for use by the border patrol agents should be identified as allowable uses in the RMP. In addition, please address the physical impacts that maintenance roads could have to biological resources (i.e. increase in the potential for non-native species, soil erosion) and discuss potential mitigation measures for slope stabilization.

FIRE SUPPRESSION

3. A significant portion of the BLM land is prone to wildland fires. The County owns and manages several County Open Space Preserves (County Preserves) that are adjacent to the BLM lands, including Volcan Mountain, Heise Park, Agua Caliente Springs Park, Mountain Springs Park and In-Ko-Pah Park. The RMP discusses fuel management activities as allowable uses within the RMP. Fire access roads are a matter of public safety and are necessary to allow for preventative maintenance (i.e. fuels removal) and to

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control the spread of wildfires. It is recommended that the RMP include a fire management plan that identifies the location of fire access roads and identifies appropriate coordination with the fire agencies that serve the area. The County of San Diego Departments of Planning and Land Use (DPLU) and Parks and Recreation (DPR) would also like to be notified of any prescribed burns adjacent to private lands and/or preserves managed by the County Department of Parks and Recreation.

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RECREATION**General Comments:**

4. Five County Open Space Preserves (County Preserves) totaling 4,515 acres are located in the BLM Eastern San Diego County Planning Area, including Volcan Mountain, Heise, Agua Caliente Springs Park, Mountain Springs Park, and In-Ko-Pah Park. The Preserves directly adjacent to BLM owned land include Volcan Mountain and Agua Caliente Springs. DPR will limit its comments to potential impacts to the use and enjoyment of these Open Space Preserves.

Recreation activities allowed within the BLM Special Recreation Management Areas located in the Planning Area include camping, Off Highway Vehicles' (OHV) use, equestrian use, target shooting, hunting, mountain biking, hiking and backpacking, wildflower and wildlife viewing, rock hounding, and pleasure touring. Hunting is not allowed in County of San Diego Preserves. As stated in the County of San Diego Department of Parks and Recreation Regulations under Article 2, Sec. 41.117 Weapons and Fireworks, "No person shall use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park." Since hunting on federal lands within the State of California is regulated by California Department of Fish and Game (CDFG), DPR recommends that BLM and CDFG inform hunters of this regulation in locations adjacent to County Preserves.

Non-motorized trails are made available throughout the Countywide Preserve system and are utilized by hikers, mountain bikers, and equestrians. As stated in the County Community Trails Master Plan, one of the Countywide Goals is to "Consider both public and private lands for trail implementation." Several BLM Recreation Management Zones are located adjacent to County Preserves. DPR would like to review and coordinate with BLM any proposed extensions of non-motorized trails into County Preserves within the Planning Area.

Specific Comments:

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5. The County DPR has specific comments for the proposed Sawtooth Wilderness Semi-Primitive Recreation Management Zone (RMZ), Sawtooth Wilderness Primitive RMZ, and Chariot Canyon RMZ as DPR facilities are adjacent to these areas.

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Hunting is a recreational use allowed under Alternatives B, D, and E in Sawtooth Wilderness Semi-Primitive RMZ, Alternative C in Sawtooth Wilderness Primitive RMZ, and Alternatives B, C, D, and E in Chariot Canyon RMZ. These RMZs are adjacent to both Volcan Mountain and Agua Caliente Open Space Preserves. Public access is allowed on the western side of Volcan Mountain, but not on the eastern side adjacent to the proposed Chariot Canyon RMZ. Public access is also not available within the southern area of Agua Caliente Preserve adjacent to the proposed Sawtooth Wilderness Semi-Primitive and Primitive RMZ's. As stated above, discharging of firearms into a County Preserve is not allowed (County of San Diego Department of Parks and Recreation Regulations under Article 2, Sec. 41.117 Weapons and Fireworks).

As discussed under all five alternatives, no non-motorized trails are designated within the Chariot Canyon RMZ located adjacent to Volcan Mountain Preserve. Sawtooth Wilderness Semi-Primitive (Alternatives B, D, and E) and Sawtooth Wilderness Primitive (Alternative C) RMZ's propose three non-motorized routes of travel that end at the southern border of Agua Caliente Preserve. DPR requests that if in the future BLM is interested in constructing non-motorized trails in the section of Chariot Canyon RMZ adjacent to Volcan Mountain Preserve or extending their three existing non-motorized trails into Agua Caliente Preserve, that it coordinate with DPR.

GENERAL PLAN 2020 PROPOSED LAND USES

6. The County's proposed General Plan 2020 (GP2020) land uses for private land located in the BLM Planning Area are available from SANGIS. Residential land uses were endorsed by the Board of Supervisors in May 2004 and the non-residential land uses were endorsed in June 2005. It is recommended that the BLM RMP discuss the effect that the proposed BLM RMP could have on planned land uses in the County's jurisdiction.

PROPOSED UTILITY CORRIDORS & ENERGY DEVELOPMENT

7. BLM proposes a change in the Visual Resource Management (VSR) classification for the McCain Valley area which would allow for new public facilities and/or infrastructure, such as windmills, to provide for new sources of energy.

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The EIS should fully evaluate the potential visual impact of allowing certain public facilities/infrastructure associated with energy and communication. Windmills, wireless facilities, maintenance roads, and powerlines could have potentially significant impacts to the scenic natural resources. In addition, this infrastructure may detract from the rural community character of the surrounding area and could alter panoramic views of ridgelines, the skyline, and the undeveloped natural landscape.

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8. The EIS should fully evaluate the potential adverse to raptors, bats and avian species from wind turbines.

BIOLOGY

9. The County of San Diego, Department of Planning and Land Use supports development of the El Centro BLM RMP and recognizes the value it will have to preserving biological diversity in the region. Lands within the EL Centro BLM boundaries that have already been acquired for conservation have contributed to the development and viability of the County's Multiple Species Conservation Program (MSCP). Future acquisitions, habitat management, and monitoring of sensitive species within the BLM will further contribute to the implementation of the County's MSCP by protecting sensitive plants, animals, and their habitats.

In 2006, the County held meetings with the El Centro and South Coast BLM Office to coordinate efforts and discuss the status of the County's East County MSCP Plan and the BLM's RMP Plans. In May 2007, the County and the BLM formally entered into a Memorandum of Understanding to coordinate conservation planning efforts for the purpose of developing the preserve design for the East County Multiple Species Conservation Program (ECMSCP) Plan.

The ECMSCP Plan is in the habitat/species modeling phase and a preserve design has not been developed. The County would like to continue to coordinate with the BLM to protect and enhance habitat for Big Horn Sheep and Quino Checkerspot Butterflies as well as the 153 sensitive species that are proposed for coverage in the East County MSCP Plan. The 153 sensitive species can be viewed at the following weblink: www.mscp.san-diego.org (Note: Click on portal preview button on the home page and you will not need to register, then click on the East County MSCP link and then click on biology link to view the species list).

The Comments below are in reference to the BLM proposed RMP Executive Summary Tables.

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10. The County requests clarification about the tree removal in Buck Canyon, Chariot Valley Oriflamme Canyon or McCain Valley areas, per the Vegetative Use Authority Table on page ES-5 (allowed under Alternatives A-E).
11. The County recommends that BLM protect the habitat of sensitive wildlife and sensitive plants in the Planning Area (Alternative A).
12. As discussed in General Plan 2020 Road Network Planning section above, biological impacts from roads should also be addressed.

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OTHER ISSUES

13. The County recommends that mineral extraction should not be permitted in Areas of Critical Environmental Concern (ACECs). Mineral extraction is in conflict with ACEC management goals.
14. The EIS should fully evaluate the potential adverse effect that geothermal development in Jacumba and Agua Caliente could have on the environment, including but not limited to, visual impacts from placement of new equipment and or structures and possible environmental impacts to soil and groundwater.

DISPOSAL OF BLM LAND

15. The County recommends that the BLM retain lands that are currently managed for ecological preservation especially where the BLM lands may be a cornerstone for open space land that contains sensitive biological and/or cultural resources.

The County of San Diego appreciates the opportunity to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Kimberly Zuppiger at (858) 694-3499 or e-mail kimberly.zuppiger@sdcounty.ca.gov.

Sincerely,



GARY L. PRYOR, Director
Department of Planning and Land Use

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