

## APPENDIX E

### PUBLIC COMMENTS

This appendix contains copies of the letters received during the public review period (28 September to 27 November 2006) for the Public Review Draft of the MCB Camp Pendleton INRMP and responses to those comments. Copies of the Public Review Draft INRMP were placed in libraries in San Clemente, Oceanside, and Fallbrook and on the Base's website during the review period. Letters were received from 4 individuals or organizations. Opportunities for additional public comment are identified in Section 1.2.3 of the INRMP. Please note that letters from reviewers may have references to sections within the Public Review Draft of the document that were moved or deleted during preparation of the final document.

Following the letters from reviewers are Camp Pendleton's responses to the comments. The reader should refer to the list of Acronyms and Abbreviations for terms that are not spelled out within the responses.

Reference Number for Letter <sup>1</sup>	Reviewer
1	James W. Royle, Jr., Chairperson, Environmental Review Committee, San Diego County Archaeological Society
2	Kevin Lafferty, Research Ecologist, USGS Western Ecological Research Center
3	Ron Freeman, Supervisor-Natural Resources Environmental Management (South), San Diego Gas & Electric
4	Tina J. Terrell, Forest Supervisor, USDA, Cleveland National Forest



# San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 October 2006

1

To: Assistant Chief of Staff, Environmental Security  
Attn: Ken Quigley  
Marine Corps Base Camp Pendleton  
Box 555008  
Camp Pendleton, CA 92055-5008

Subject: Draft Revised Integrated Natural Resources Management Plan (INRMP)

Dear Mr. Quigley:

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

We note that, in general, definition of the management for cultural resources is handled via another document. To the extent that this document cites and highlights the need to also be aware of cultural resources, we commend the treatment of cultural resources in the INRMP.

One minor item we noticed occurs on page 1-15, in the first paragraph under "Archaeological and Cultural Resources", where it states: "The Base will have surveyed and documented locations of all visible archaeological sites by the year 2003." The paragraph should be updated.



Thank you for this opportunity to provide our comments on the draft revised INRMP.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.". Below the signature, the name and title are printed: "James W. Royle, Jr., Chairman" and "Environmental Review Committee".

cc: SDCAS President  
File

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# 2

Camp Pendleton Integrated Natural Resources Management Plan October 2001

Comments on Ch3 Natural Resources

3.2.3.13

First paragraph, last sentence

The FWS delisting proposal was dropped (so this reference should be deleted). The final recovery plan is now available.

A

Second paragraph: Should add that populations on Pendleton are genetically distinct from the rest of the species (Dave Jacobs UCLA).

B

Third paragraph. It is worth mentioning that Habitat at French is poor in dry years (because the lagoon becomes hypersaline). Also, Santa Margarita is inappropriate habitat in years where it remains open to tidal flushing all year round.

C

Table 3-8  
Update with

Year	San Mateo	San Onofre	Los Flores	Hidden	Aliso	French	Cocklebur	Santa Margarita
2002	+	+	+	+	+	-	+	-
2003	+	+	+	+	+	-	+	-
2004	+	+	+	+	+	-	+	-
2005	+	+	+	+	+	+	+	-
2006	+	+	+	+	+	+	+	-

D

Kevin Lafferty, PhD  
US Geological Survey



November 27, 2006

Commanding General (AC/S Environmental Security)  
Attention Ken Quigley  
Box 555008  
Marine Corps Base  
Camp Pendleton, CA 92055-5008

RE: Integrated Natural Resources Management Plan Review

Dear Mr. Quigley:

San Diego Gas & Electric appreciates the opportunity to review and comment on Marine Corps Base Camp Pendleton Integrated Natural Resources Management Plan (INRMP). SDG&E is submitting comments for consideration. The attached pages contain excerpts copied from the INRMP and have an accompanying "response" from SDG&E.

We realize the critical importance of the Marine Corps mission at Camp Pendleton and the ongoing development, review, and implementation of the INRMP. SDG&E understands its position as a major easement holder with the Department of Defense. It is important to SDG&E to remain in communication with AC/S Environmental Security and continue to strive for better coordination and cooperation when performing the vital operations and maintenance of gas and electric facilities which are present Camp Pendleton. SDG&E facilities are critical to supplying energy to the San Diego and southern Orange County as well as Camp Pendleton.

SDG&E look forward to many years of collaborating with AC/S Environmental Security as they provide sustained support for the military mission and implement the Integrated Natural Resource Management Plan.

Respectfully,

Ron Freeman  
San Diego Gas & Electric  
Supervisor – Natural Resources  
Environmental Management - South

*Executive Summary*

**Introduction**

Page ES-4, Lines 29-34.

**Statement:** Similar to local municipalities, the Base provides military service members and their families with support facilities and services, including housing, water and sewage service, solid waste disposal, medical and dental services, schools, child care, employment assistance, and recreation opportunities. Camp Pendleton currently has more than 5,000 buildings and structures, 500 miles of roads, and nearly 1,000 miles of utility lines base wide.

**Response:** SDG&E has approximately 150 miles of the utility lines referenced above and 134 miles of access roads on Camp Pendleton and these utility lines serve San Diego County and portions of Orange County.

A

*Chapter 1 - Introduction*

**1.2. INRMP COORDINATION, EVALUATION, AND UPDATES**

**1.2.1. Reviews and Updates**

Page 1-7, Lines 5-10.

**Statement:** To accomplish these annual reviews, Camp Pendleton's Natural Resources Department will coordinate the review, evaluation and update of Camp Pendleton's INRMP. The Natural Resources Department will obtain input and guidance from individuals representing other departments and critical interests of Camp Pendleton to ensure the INRMP reflects involvement of a cross section of land users and land managers at Camp Pendleton.

**Response:** SDG&E appreciates the opportunity to participate in the review of the INRMP.

B

*Chapter 1 - Introduction*

**1.4. NATURAL RESOURCES MANAGEMENT GOALS**

**1.4.3. Camp Pendleton Natural Resources Management Program Goals**

Page 1-19, Lines 17-20.

**Statement:** Natural resources management goals specifically adopted by Camp Pendleton are as follows:

- Encourage regional plans and incentives that address conservation of native biodiversity, ecosystem sustainability, and watershed management issues to help ensure and protect the long-term viability of both Camp Pendleton's military mission and its natural resources.

**Response:** Though this is mentioned later in the document, the use of the SDG&E Subregional Plan on Camp Pendleton may not only achieve this goal, but streamline the process of approval for SDG&E Operation and Maintenance activities.

C

*Chapter 2 - Mission, Land Use and Regional Setting*

**2.3.2.5. Utilities and Fencing**

Page 2-24, Lines 36-43.

**Statement:** These utilities are separate from those owned and operated by leaseholders on Base (see Sections 2.3.3.3 and 2.3.3.4).

While underground and aboveground utility lines are located throughout the Base, most utility facilities are located within cantonment areas. Aboveground telephone and fiber optic cables typically follow major roads throughout Camp Pendleton. Within the last several years, there has been significant effort to route and locate underground utility lines within the footprint of existing roads and trails to reduce disturbance to natural areas.

**Response:** The statement that most utility facilities are located within cantonment areas maybe correct for Base utilities. However, it is not a correct statement relative to San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SCG). The majority of the transmission, distribution, and gas lines, as well as the substations are not within cantonment areas.

D

Chapter 2 – Mission, Land Use and Regional Setting

2.3.3. Real Estate Agreements and Leases

Page 2-28, Lines 35-40; Page 2-29, Lines 1-25

**Statement:** A number of long-term leases and easements have become part of the land use on the Base. Base real estate agreements (e.g., leases, easements, assignments) cover approximately 5,000 acres of the Base (not inclusive of leased acreage within cantonment areas). These agreements include easements for public utilities and transit corridors; leases to public educational and retail agencies; State Beach leases; and agricultural leases for row crop production and seed collection. Recently renewed leaseholder agreements require that each leaseholder comply with any and all applicable federal and state regulatory laws. Some of the real estate agreement acreage is also available to training (e.g., utility corridors, and State Beach land). An estimated 3,600 acres of leased land is not available for training.

Future requests for non-military projects and leases on Camp Pendleton will be evaluated, with regards to potential impacts to the Base. Not only will proponents need to identify impacts from construction, but also identify long-term and daily impacts to the Base. Lease reviews will envision Base interests 100 years from now and be implemented by requiring proponents to meet the following conditions:

- Proposals must be environmentally non-degrading;
- Proposal cannot adversely affect training;
- Proposal cannot degrade Camp Pendleton quality
- Proposal must ensure safety of operating forces and
- Construction must be consistent with Base architecture.

Lessees are required to manage the natural resources on the lands leased for their use, consistent with the philosophies and supportive of the objective of the Camp Pendleton INRMP and ICRMP. Each major lessee is required to generate and submit a natural resources management plan for their leased lands for approval by the Base within one year of establishment of their lease or renewal. Lessees are also required to identify any activity that may affect federally regulated resources (listed species, wetlands, waters of the U.S., etc.) and provide information and mitigation that may be required to support consultation with the applicable regulatory agency.

**Response:** Major lessees should be defined. For example, are SDG&E and SCG considered major lease holders on Camp Pendleton? SDG&E currently prepares Preliminary Environmental Data Sheets for most of the operation and maintenance programs conducted on Base. SDG&E already has completed consultation with the U.S. Fish and Wildlife on impacts to federally regulated species and vernal pools operations and maintenance activities within our service territory. How does this fit in with the INRMP? **E**

Chapter 2 – Mission, Land Use and Regional Setting

Page 2-31, Lines 30-44; Page 2-32 Lines 1-2

2.3.3.4. SDG&E Company (Sempra Energy)

**Statement:** SDG&E, through its parent company Sempra Energy, holds more than 153 acres of leased land agreements with the Base. Most of these leases are jointly operated and managed in concert with the Southern California Edison Company, including the SONGS and various transmission and communication corridor easements, and associated support facilities.

**Response:** SDG&E believes the 153 acres is incorrect. The transmission lines easements total are approximately 1300 acres. SDG&E and SCE do not have joint leases except for SONGS. The leases for the transmission lines are independent and specific to each utility. Separate operation and maintenance activities are also conducted by each utility. **F**

Chapter 2 – Mission, Land Use and Regional Setting

REGIONAL ISSUES AFFECTING CAMP PENDLETON'S MISSION

Page 2-46, Lines 42-46; Page 2-47, Lines 1-8

**Statement:** Rampant regional urbanization and development to support current and anticipated population growth ultimately have the potential to constrain the Base's ability to train Marines. The individual and cumulative effects of these regional issues represent encroachments that can impact the Base's ability to accomplish its mission. In this context, encroachment is defined as any non-DoD action that has the potential to impede or interfere with Camp Pendleton's responsibility for the military readiness of Marines that train there. Continually proposed, nonmilitary projects adjacent to or within Camp Pendleton's borders must be acknowledged by Base planners, military trainers, and the surrounding developing communities, as part of actual or potential encroachment. **For example, leases and easements and particularly, aboveground utilities such as the SONCS, SDG&E, I-5, and railway lines reduce the land available for military use and challenge the conduct of realistic military training activities. Obvious constraints exist for amphibious landing exercises along the Base's entire western boundary, in particular.**

**Response:** Please qualify the last two sentences. SDG&E acknowledges the transmission lines may reduce the land available for some training missions. However, that reduction is insignificant because only a small area (measured in square feet) is occupied by a tower. The area between the tower spans are unoccupied land and available for use. The current SDG&E easement agreements do not prohibit or prevent use by the military. The SDG&E access roads are also used by the military in the various Training Areas. SDG&E transmissions lines are not located west of I-5. The majority of the SDG&E transmission lines are approximately 2.5 miles east of area from Gold to White Beach.

G

Chapter 2 – Mission, Land Use and Regional Setting

2.5.2. Public Utilities

Page 2-50, Lines 4-11

**Statement:** Easements for public utilities (and access roads/corridors to maintain those utilities) are located throughout the Base. These facilities include supporting structures for power lines, telephone lines, cellular towers, radio repeaters, fiber optic cables, and pipelines (see Sections 2.3.3.3 and 2.3.3.4). **While each easement may not seem significant in its own right, when taken in aggregate they restrict or constrain amphibious, ground and aviation training opportunities. The physical structures located in these easements (e.g., power poles and telephone poles) pose restrictions on ground and air movement.**

**Response:** The third sentence is a very broad statement. How do power poles and towers restrict or constrain amphibious or ground movement? SDG&E does not have any structures west of I-5 that would interfere with amphibious activities. See comment above.

H

Chapter 5 - Access, Recreation, Education

5.1.2. Real Estate Agreements: Leases, Easements, etc.

Page 5-5, Lines 3-14

**Statement:** OBJECTIVE: Ensure that all real estate agreements are compatible with Camp Pendleton's military mission and consistent with Camp Pendleton's natural resources management and public access policies. Camp Pendleton allows recurring use of over 5,000 acres of the Base to non-military organizations through leases, easements, outgrants, permits, etc. These agreements include easements for public utilities (e.g., SONCS, SDG&E pipelines, and telephone cables); transit corridors (e.g., I-5); leases to public, recreational, and educational organizations (e.g., San Onofre State Beach, Boy Scouts of America, and Fallbrook and Occochee School Districts); and agricultural leases for row crop production, seed collection, and grazing (see Section 2.3.3).

**Response:** All SDG&E operation and maintenance activities comply with specific Categorical Exclusions issued by the Base or with our Subregional Natural Community Conservation Plan.

Chapter 2 – Mission, Land Use and Regional Setting

2.4.2. Natural Communities Conservation Planning (NCCP) Programs

Page 2-38, Lines 6-23

I

**Statement:** Several Subregional plans have been or are being developed in San Diego County under the NCCP program umbrella. Some of these plans contain subarea plans, specific to political jurisdictions or geographic areas within the plan area, and may be pending completion and permitting or Multiple Species Conservation Plan (MSCP) (cities and unincorporated county areas of southwest San Diego County) developed in 1996; the MHCP that includes seven incorporated cities in north county (completed and approved by the San Diego Association of Governments (SANDAG) in 2003); the North County MSCP Subarea Plan, which includes the unincorporated County lands in the north part of the county; the East County MSCP Subarea Plan (previously to as the County of San Diego Multiple Habitats Conservation and Open Space Plan (MHCOSP)); **SDG&E Company Subregional Plan**; and the San Diego Joint Water Agencies Subregional Plan. Regions to the north and east of Camp Pendleton are also participating in the NCCP program with the development of three NCCP subregion plans in Orange County including the Southern (pending completion), Northern (pending completion), and Central-Coastal NCCPs (permitted in 1996) (Figure 2-25); and also the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) (permitted in 2004). Table 2-2 summarizes habitat conservation planning cities or counties in the vicinity of the Base.

**Response:** How do these Subregional plans interface with the INRMP?

J

Chapter 2 – Mission, Land Use and Regional Setting

2.4.2.3. SDG&E Company Subregional Plan

Page 2-40, Lines 39-44

**Statement:** The NCCP Subregional Plan for SDG&E, extending from southern Orange County to the Mexican border, was the first plan approved in San Diego County (in 1995). The project provides coverage for 110 plant and animal species and emphasizes avoidance of impacts. The plan establishes mitigation requirements that may include re-vegetation or use of up to 240 acres of mitigation credits, set aside in several land parcels purchased by SDG&E as a mitigation bank. SDG&E's fee-owned rights-of-way and easements may play an important role in the NCCP region in providing habitat connectivity in areas where little natural habitat remains.

The SDG&E Subregional Plan covers actions on federal and non-federal lands. For activities within their lease on the Base, SDG&E coordinates directly with the USFWS under the terms of their plan. Should they require access to other Base lands not in their lease, methods of determining ESA compliance would be determined during the Base's decision process for approving activities occurring outside their existing easements.

**Response:** The NCCP does apply to SDG&E operation and maintenance activities on federal and non federal lands. The NCCP covers the Service Territory and is not restricted to specific fee owned or leased easements. The second paragraph seems to imply that the Base is stating that SDG&E operation and maintenance activities within our easements no longer requires the PED/Categorical Exclusion process because of our NCCP? Is that correct?

K

Chapter 2 – Mission, Land Use and Regional Setting  
2.3.2.3. Roads, Trails, Firebreaks, etc.

Page 2-23, Lines 28-29; Page 2-24, Lines 1-11

**Statement:** Primary and secondary roads, parking lots, and culverts are widely distributed across the Base. Primary roads consist of paved and improved roads, while secondary roads are dirt roads with decomposing granite, gravel, or shale as a surface covering. Of the more than 500 miles of roadways that exist on Base, approximately 103 secondary roads exist. In addition, the Base has established an extensive network of 85 firebreaks and 1 fuel break (MCBCP 1998a), totaling nearly 1,300 acres and covering approximately 146 linear miles. A firebreak is any natural or constructed barrier consisting of bladed or disked bare earth used to segregate, stop, and control the spread of fire. A fuelbreak is a natural or constructed barrier that includes mowed or modified vegetation and is used to segregate, slow, and control the spread of fire or provide a control line from which to work. Fuel breaks are wider than firebreaks and unlike firebreaks, are not designed to completely stop a fire. As a result, fuel breaks allow more time for the fire's heat to dissipate before reaching the firefighter.

**Response:** The maintenance of existing access roads is conducted by SDG&E in a manner consistent with the mission of natural resource management on the Base. The following points are indirectly referenced in the INRMP:

- Minimizes erosion on over 134 miles of existing access road of the 500 total miles on Base through an annual maintenance road grading program.
- Minimizes maintenance by the military on over 134 miles of existing access road of the 500 total miles on Base through an annual maintenance road grading program.
- Allows for emergency access to many remote areas of the Base.
- Allows for military ready-access into training areas.





United States  
Department of  
Agriculture

Forest  
Service

Cleveland National Forest  
SO

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File Code: L500  
Date: NOV 8 2000

Colonel J. B. Seaton  
United States Marine Corps  
Marine Corps Base  
Box 555015  
Camp Pendleton, CA 92055-5015

Dear Colonel Seaton:

Thank you for the opportunity to review the Draft Revised Integrated Natural Resources Management Plan for the Marine Corps Base (MCB) Camp Pendleton. The southwestern end of the Trabuco Ranger District shares a common boundary with MCB Camp Pendleton including the majority of the San Mateo Watershed. The Draft document spells out the many common interests we have in natural resource management in this region as well as the formidable problem of managing sustainable natural resources in the fire prone environments of the coastal sage scrub and chaparral that dominate our shared landscapes.

The Cleveland National Forest has recently completed a revision of our Land Management Plan. This plan is available online at: <http://www.fs.fed.us/r5/scfpr/projects/lmp/index.htm>. Management strategies proposed in the Draft Natural Resources Plan are compatible with the Cleveland National Forest's revised Land Management Plan, especially regarding the commitment to continued coordination on fire management issues, management of invasive species and restoration of threatened, endangered and sensitive species that occupy habitats in the San Mateo Canyon area.

Management of the San Mateo Wilderness immediately upstream from lands managed to support military training exercise is a challenge for both of our agencies. The vegetation management strategy proposed in the draft plan is critical to protecting the Wilderness from excessively frequent fire that could degrade the Wilderness resource values over time. Vegetation type-conversion from high fire frequencies was identified as a significant issue for the Forest in general and is especially problematic in our low elevation coastal sage scrub and chaparral habitats.

Our revised Land Management Plan and National Strategic Plan call for an increased emphasis on management of invasive species that threaten long-term function of Forest ecosystems. This is a problem that truly requires closely coordinated efforts across jurisdictions to be effective. Current levels of funding and using tools that are appropriate to the Wilderness environment have made this a particular challenge in this area; however, we continue to support finding creative solutions for reducing the spread of invasive species.



Caring for the Land and Serving People



**RESPONSES TO COMMENTS**  
**on the**  
**MCB Camp Pendleton Integrated Natural Resources Management Plan**  
**(Public Review Draft, August 2006)**

**Letter 1 James W. Royle, Jr., Chairperson, Environmental Review Committee, San Diego County Archaeological Society**

1A Comment noted. Appendix N contains sections excerpted from Camp Pendleton's Base Order P3500.1M (*Range and Training Regulations*) which is being updated. The comment provided has been forwarded for inclusion in the updated Range and Training Regulations. Upon completion of the Range and Training Regulations Appendix N will be updated.

**Letter 2 Kevin Lafferty, Research Ecologist, USGS Western Ecological Research Center**

2A Text in the revised INRMP has been updated.

2B Information that the populations on Camp Pendleton are genetically distinct has been added to the detailed species account (Appendix F, F.22.2).

2C Comment noted.

2D Table has been corrected to include updated information.

**Letter 3 Ron Freeman, Supervisor-Natural Resources Environmental Management (South), San Diego Gas & Electric**

3A Comment noted.

3B Comment noted.

3C Comment noted.

3D The Section has been revised.

3E The Section has been revised.

3F The Section has been revised.

3G The Section has been revised.

3H The Section has been revised. Power poles and towers restrict the aviation aspect of amphibious operations on Camp Pendleton and aviation support of

ground operations. Power lines limit indirect fire weapons use of training areas for live fire into impact areas.

3I Comment noted.

3J Subregional plans and regional land use provide a context for understanding the circumstances under which the Base currently operates and a starting point for understanding its conservation role, as a result of land development trends, regional socio-economics, land planning decisions made by agencies other than the DoD and regional conservation efforts. Understanding regional land uses and conservation efforts also provide a context for predicting future trends. Land use and conservation efforts (or lack thereof) in the region also affect the Base. The Base works with regulatory agencies and developers of subregional plans to ensure that management programs described in the INRMP and the subregional plans are supportive of each other.

3K The Section has been revised. SDG&E still needs to follow the established PED/Categorical Exclusion process. Subregional plans usually only cover compliance with federal and state endangered species laws. Camp Pendleton is responsible for ensuring its lease holders activities are in compliance with all regulations that the Base complies with.

3L Comment noted.

**Letter 4 Tina J. Terrell, Forest Supervisor, USDA, Cleveland National Forest**

Your letter and the on going support of your staff is appreciated. Camp Pendleton remains committed to supporting regional resource management efforts that cross jurisdictional lines and enhance regional resources.

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<sup>1</sup> In chronological order according to date received.