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*Comment Received From: Cathleen Pryor
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The project will interfere with the restoration of natural habitat

This is the 2026 work plan for the Center for Natural Lands Management, a nonprofit devoted to restoring native habitat to attract native species of insects, birds, and animals, provide for their needs, protect their nests and dwellings. The CNLM provides a valuable service in this ravine. They have spent years and produced positive results after long workdays hiking up and down the slopes eradicating invasive plants, spreading seeds for native plants, weeding, and monitoring the activity of the wildlife.

All of their efforts could be ruined by 13 acres of concrete, topped with metal shipping containers radiating heat, the din of 300?, 500? more? air-conditioning units loudly churning air for 24 hours a day, and the noise of the electrical substation and the operation of the facility. We need to know what is planned.

Installing a Battery Storage Facility in this ravine of any type that needs mechanical cooling would disrupt the wildlife we are trying to preserve. Jobs depend on restoring this valley. Endangered or threatened species rely on the preservation of this little valley.

The Center for Natural Lands Management has contracted with the City of San Juan Capistrano and the Laguna Heights Community Association and been granted easements to restore hundreds of acres of land. Their progress so far has been remarkable. We want that to continue.

Please deny this application.

Additional submitted attachment is included below.

ANNUAL WORK PLAN FOR THE FISCAL YEAR 2026
(October 1, 2025 – September 30, 2026)

PACIFICA SAN JUAN PRESERVE (S053)

Provided to:

United States Fish and Wildlife Service

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&

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30 September, 2025

I. Introduction

The Pacifica San Juan Preserve (Preserve) is a component of the Pacific Point Project (Project) located in the City of San Juan Capistrano, Orange County, CA. The Preserve is comprised of two areas: “On-site,” a 9.6-acre area owned by the Pacifica San Juan Homeowners Association (PSJHOA), and “Off-site,” a 33.2-acre area owned by the Laguna Heights Community Association (LHCA), both located in San Juan Capistrano (Figure 1). Two Conservation Easements (CEs) were granted to the Center for Natural Lands Management (CNLM) in 2016, one for each area (CNLM and LHCA 2016; CNLM and Pacific Point Development Partners, LLC 2016a). The California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS; collectively “Regulatory Agencies”) are both third-party enforcement beneficiaries for the CEs. At the time the CE was granted, a significant portion of the Preserve was dominated by non-native plant species; since then, the Preserve has been restored to create native coastal sage scrub (CSS) habitat. CNLM assumed long-term management of the Preserve in March 2023, at the end of the construction/restoration sequence and following the determination by the Regulatory Agencies that the restoration had successfully met the terms of their respective permits.

The On-site area is adjacent to 2,000 acres of open space, most of which is already permanently protected and is referred to as the Southern Open Space (Derek Ostensen and Associates 2015). Despite being near this larger tract of open space, the On-site area is in an urbanized area, with homes along its eastern and southern boundaries. There is a paved access road separated by a fuel modification zone along the western boundary. The On-site area is part of the Draft Orange County Southern Subregional Habitat Conservation Plan and the Orange County Natural Community Conservation Planning (NCCP) area (County of Orange and USFWS 2006).

The Off-site area is within the 1,000-acre Northwest Open Space (NOS), most of which is permanently protected and managed by the City. The NOS is comprised of patches of native and non-native habitat. Oso Creek is located below this area of the Preserve. The Off-site area has a trail, ornamental vegetation, and homes along its western boundary, and native and non-native habitat along its other boundaries.

On-site and Off-site Perpetual Management Plans (PMPs; Ostensen and Associates 2015a; Ostensen and Associates 2015b) were finalized in 2015 to address mitigation needs associated with the Project, including the protection of the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*; CAGN). CNLM is responsible for perpetual management of the Preserve and the endowment for such has been fully funded.

II. Summary of Goals, Objectives, and Anticipated Activities

This work plan describes the anticipated activities of CNLM on the Preserve throughout Fiscal Year (FY) 2026 (October 1, 2025 to September 30, 2026) based on conditions defined in the PMPs and Conservation Easements. Specifically overarching management objectives for the Preserve are as follows:

- Protect and manage sensitive native habitats, wildlife, and ecosystem processes on the Preserve for the benefit of local and regional conservation goals;
- Conduct CE compliance monitoring and regular patrols to ensure continued protection of the habitat;

- Maintain existing public access along authorized trails, while preventing unauthorized access or public use that could damage the Preserve's conservation values;
- Contribute to the preservation, restoration, and expansion of the endangered or threatened species and their habitats that are present on the Preserve;
- Contribute to the preservation, restoration, and expansion of non-listed sensitive species that contribute to biodiversity; and
- Maintain communications with the landowners, Regulatory Agencies, and third-party beneficiaries to ensure effective management.

CNLM activities anticipated in FY 2026 include:

- Monitor, Enforce, and Defend the Conservation Easements
 - Conduct CE compliance monitoring
 - Conduct regular patrols of the Preserve
 - Photo-document the condition of conservation values on the Preserve
 - Document and follow up on any CE violations observed
- Monitor biological conditions on the Preserve
 - Survey for CAGN as needed
 - Opportunistically survey for potential presence of coastal cactus wren (*Campylorhynchus brunneicapillus*; CACW) least Bell's vireo (*Vireo bellii pusillus*; LBVI) and other species of concern, as resources allow
 - Conduct CSS vegetation monitoring
 - Opportunistically survey for and document other wildlife and plant taxa on the Preserve
- Maximize area and quality of habitat for endangered or threatened species
 - Map, monitor, and control invasive non-native plant species
 - Encourage expansion of native plant species
 - Collect and disperse native seeds and cactus propagules on-site, as needed
- Public Services
 - Maintain communication with landowners, the City and Regulatory Agencies regarding ongoing management efforts
 - Maintain the public access trail within the On-site area
 - Conduct community outreach and education activities
 - Patrol the public access trails
- Reporting
 - Provide an annual report detailing management activities on the Preserve to the Regulatory Agencies and landowners

A schedule of the activities described in this plan is provided in Table 1.

III. Conservation Easement Compliance Monitoring

The purpose of compliance monitoring is to ensure that natural conditions and conservation values are being maintained in accordance with those described in the CE. Permanent monitoring and photo points (Figures 2 and 3) were established in 2016 by CNLM and are visited annually to record and photo-document the condition of the CE through time. CNLM staff visit these monitoring points annually, typically in the fall after the bird nesting season has concluded for the year. Additional CE monitoring will occur in conjunction with other management activities throughout the year by CNLM staff. A summary of the CE conditions will be provided in the annual summary report (see Section VII below for details).

IV. Biological Monitoring

Vegetation Monitoring

CNLM will conduct long-term vegetation monitoring to measure the condition of CSS habitat within the Preserve. In FY 2026, CNLM anticipates five rapid assessment plots (two On-site and three Off-site) will be monitored following the California Native Plant Society relevé method. These plots are anticipated to be monitored on a rotating basis every five years. Opportunistic botanical monitoring will occur throughout the year, and any new species occurrences will be recorded and mapped.

Coastal California Gnatcatcher

During bird breeding season (15 February – 31 August), presence/absence surveys for coastal CAGN will be performed by CNLM prior to, during, and after management activities in the habitat to avoid impacts on CAGN. Locations of all CAGN detected will be mapped and nest locations will be avoided until the nest has fledged.

General Wildlife Monitoring

Wildlife cameras will be set up in strategic positions and locations (game trails, den sites, etc.) throughout the Preserve to capture images and video of resident and/or transient wildlife. CNLM anticipates deploying at least one camera in each area, On-site and Off-site. Species found on the Preserve will be recorded.

V. Habitat Maintenance

Non-Native Invasive Species

CNLM staff will target the removal and treatment of non-native invasive plant species throughout the Preserve as time and resources allow, prioritizing known infestations of species that pose the greatest threat to native plant communities (Table 2). Species of note include artichoke thistle (*Cynara cardunculus*), mustards (*Brassica nigra* and *Hirschfeldia incana*), Malta star thistle (*Centaurea melitensis*), tree tobacco (*Nicotiana glauca*), and bristly oxtongue (*Helminthotheca echioides*). Non-native plants will be treated mechanically (removed by hand pulling, weed whacking, or by chain saw) and/or chemically as part of CNLM's integrated pest management practices. CNLM staff who apply pesticides will receive pesticide safety training annually, as required by CNLM policy and the California Department of Pesticide Regulation. CNLM staff will map and document invasive plant removal. Newly created openings in vegetation may be seeded with native plant species or cactus propagules collected on the Preserve as resources allow.

In FY 2025 fireweed groundsel (*Senecio linearifolius*) was detected and removed in three locations on the Off-site Preserve (Figure 4). This invasive plant is a regional early detection and rapid response (EDRR) target, an approach of addressing new invasive species and reducing their impact before they can become widespread (Kratville & Valentine 2021). EDRR is most effective when there are a small number of localized populations and eradication, or containment is possible. CNLM staff will continue to monitor known fireweed groundsel occurrences, survey for any new occurrences, and treat any individuals observed.

Seeding

While the restoration of the Preserve has largely been successful in transforming the vegetation into high-quality CSS, pockets of low native plant cover remain. In the first quarter of FY 2026, CNLM staff will spread native shrub and forb seed collected on the Preserve in FY 2025 in these areas, prioritizing areas within or adjacent to high-quality CAGN habitat.

VI. Public Services

Maintenance Activity Coordination

The On-site fence and trail will be maintained by CNLM staff to protect the Preserve from improper use and access. The City maintains the trails, trail fence and roads at the Off-site Preserve. CNLM will continue to coordinate with the adjacent landowners and Orange County Public Works regarding infrastructure that intersects the Preserve. To maintain vehicle access to the Off-site area, CNLM will apply for a continuation of the City-granted encroachment permit.

Patrols

CNLM will conduct regular patrols of the Preserve, focused on ensuring that conservation values are maintained or enhanced. During these patrols staff will document CE violations, trespass, trash, and encampments within the Preserve; take appropriate action to correct observed issues; engage with the public and provide outreach to trail visitors; and deter unauthorized activities before they occur.

Public Outreach

Public outreach will be provided through on-site education with Preserve visitors, updating information on the CNLM website, providing presentations to interested local groups, patrols, and coordinating activities with adjacent residents, landowners, and other interested organizations. CNLM staff will continue to coordinate with the Regulatory Agencies, the City and landowners on relevant stewardship activities.

VII. Reporting

All GIS and biological data collected will be managed and filed appropriately in CNLM's cloud-based system.

An annual report detailing the management and monitoring program implemented during FY 2025 is expected to be provided to the City, landowners, and Regulatory Agencies by 31 December 2025. A draft work plan and budget for FY 2027 is expected to be prepared by 1 October 2026.

VIII. References

CNLM and LHCA. 2016. Conservation Easement, Pacifica San Juan Preserve- Laguna Heights Unit. Recorded February 1, 2016. Signed 28 January 2016 by Laguna Heights Community Association.

CNLM and Pacific Point Development Partners, LLC. 2016a. Conservation Easement, Pacifica San Juan Preserve- Pacifica San Juan Unit. Recorded February 1, 2016. Signed 28 January 2016.

CNLM and Pacific Point Development Partners, LLC. 2016b. Pacifica San Juan Preserve Management and Funding Agreement. Signed 28 January 2016.

California Native Plant Society. 2022. CDFW-CNPS Protocol for the Combined Vegetation Rapid Assessment and Relevé Field Form, November 4, 2022.

County of Orange and U.S. Fish and Wildlife Service. 2006. Southern Orange County Natural Community Plan/ Master Streambed Alteration Agreement/ Habitat Conservation Plan

(Southern NCCP/MSAA/HCP). Part I: Draft Southern NCCP/MSAA/HCP; Part II: Draft Implementation Agreement and Part V: Technical Appendices. July 2006.

Derek Ostensen and Associates. 2015a. 2014 Revised Special 4(D) Rule Perpetual Management Plan (Off-site) for Tentative Tract 14196 Pacifica San Juan (a.k.a Pacific Point) San Juan Capistrano, California. 20 August 2015.

Derek Ostensen and Associates. 2015b. 2014 Revised Special 4(D) Rule Perpetual Management Plan (On-site) for Tentative Tract 14196 Pacifica San Juan (a.k.a Pacific Point) San Juan Capistrano, California. 3 November 2015.

DiTomaso, J.M., G.B. Kyser et al. 2013. Weed Control in Natural Areas in the Western United States. Weed Research and Information Center (WRIC), University of California.

Kratville, D. and Valentine, N. 2021. Regional Invasive Plant EDRR Targets. California Department of Food and Agriculture and California Invasive Plant Council. October 2021.

IX. Figures & Tables

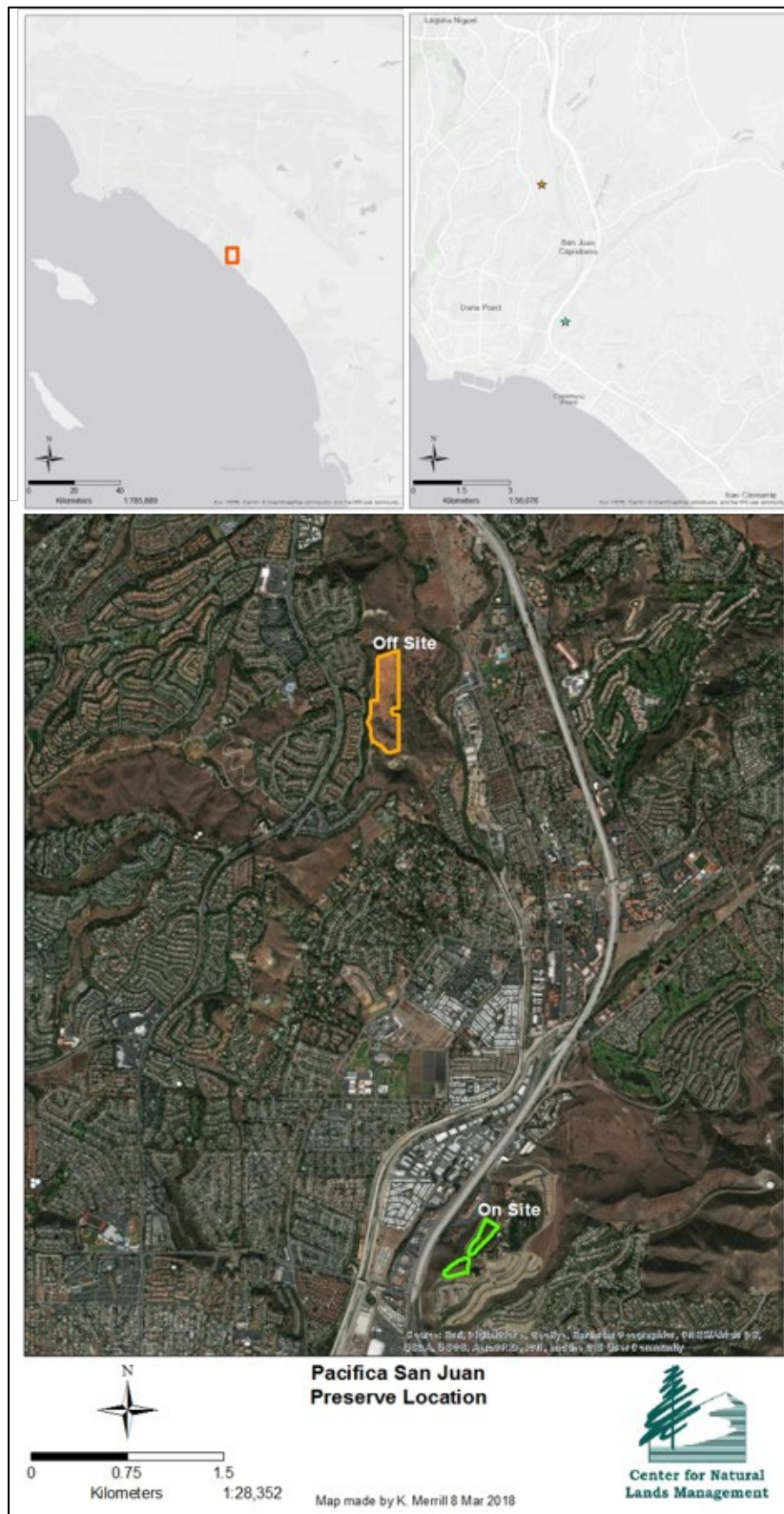


Figure 1. Map of the On-site and Off-Site Preserve areas.

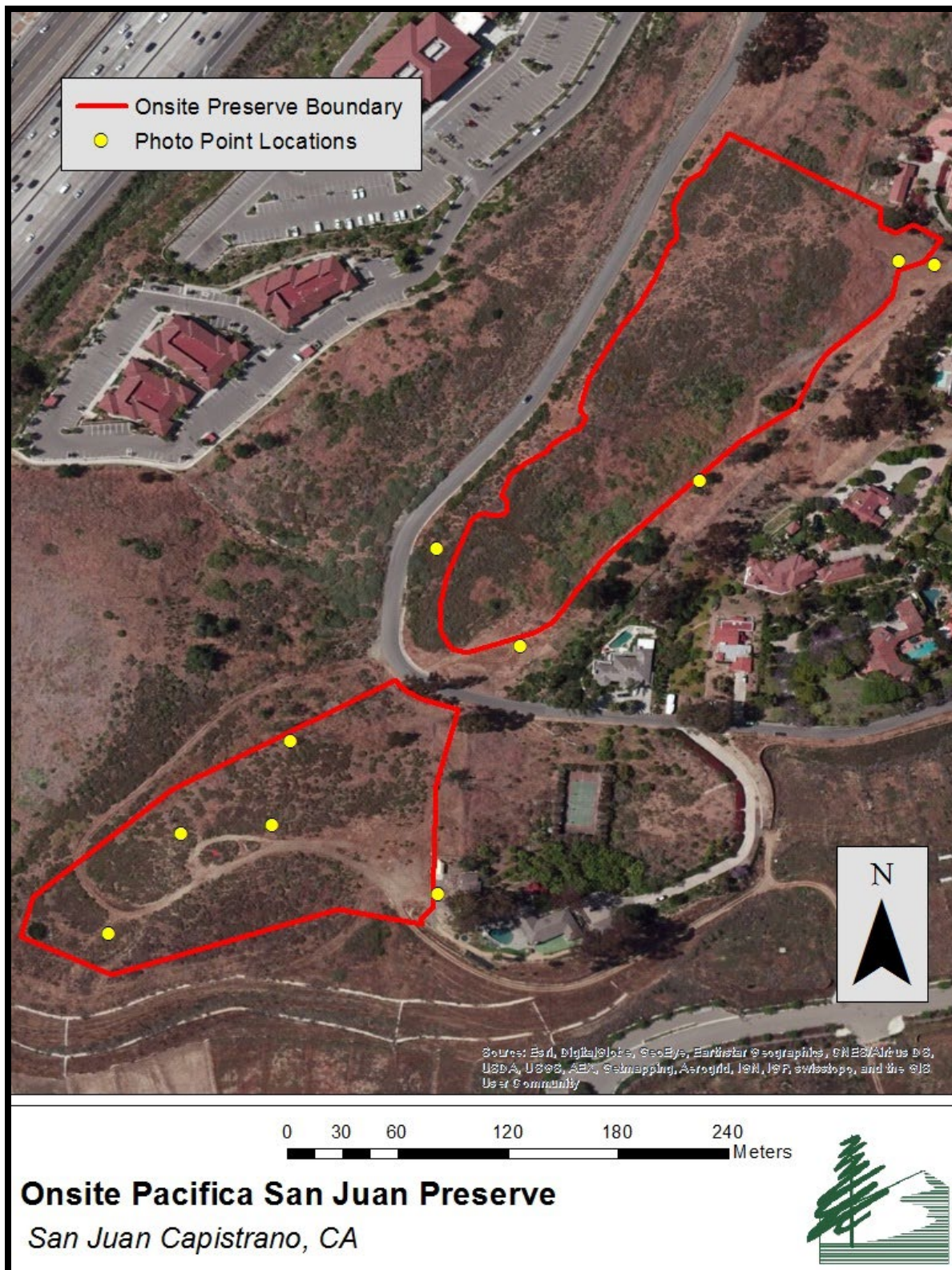


Figure 2. Map of On-site area photo monitoring points.



Figure 3. Map of off-site area photo monitoring points



Figure 4. Map of Off-site Preserve fireweed groundsel (*Senecio linearifolius*) survey results

Table 1. Proposed schedule of activities for FY 2026.

Quarter*	Activity
First (Oct-Dec 2025)	Prepare Annual Report for FY 2025
	Conduct annual CE compliance visit and photo-monitoring
	Collect and plant cactus pads for habitat maintenance as needed
	Distribute native plant seed collected from previous year
	Conduct erosion control as needed
	Opportunistically monitor for new species observations
	Conduct preventative maintenance for On-site trail before rains begin
	Monitor for and manage invasive plant species
	Patrol and conduct public outreach activities
	Coordinate with landowners and City as needed
	Apply for the City encroachment permit
	Update and maintain GIS database
	Use wildlife cameras to document wildlife use of the Preserve
Second (Jan – Mar 2026)	Conduct CAGN monitoring
	Opportunistically monitor for new species observations
	Monitor for and manage invasive plant species
	Conduct erosion control as needed
	Patrol and conduct public outreach activities
	Coordinate with landowners and City as needed
	Coordinate access for management activities as needed
	Update and maintain GIS database
	Use wildlife cameras to document wildlife use of the Preserve
	Conduct trail and fence maintenance On-site as needed
Third (Apr – Jun 2026)	Continue CAGN monitoring, as needed
	Conduct CSS vegetation monitoring
	Opportunistically monitor for new species observations
	Collect seeds if annual seed production is substantial
	Monitor for and manage invasive plant species
	Patrol and conduct public outreach activities
	Coordinate with landowners and City as needed
	Coordinate access for management activities as needed
	Update and maintain GIS database
	Use wildlife cameras to document wildlife use of the Preserve
Fourth (Jul – Sep 2026)	Conduct trail and fence maintenance On-site as needed
	Prepare a budget for FY 2026
	Prepare Annual Work Plan for FY 2026
	Monitor for and manage invasive plant species
	Continue collecting seeds if annual seed production is substantial
	Opportunistically monitor for new species observations
	Patrol and conduct public outreach activities
	Coordinate with landowners and City as needed
	Continue CAGN monitoring, as needed
	Update and maintain GIS database
	Use wildlife cameras to document wildlife use of the Preserve
	Conduct trail and fence maintenance On-site as needed

*Bird surveys are done during the bird breeding season, 15 February - 31 August, for most species found on the Preserve. Vegetation community surveys are conducted March - June, after annual forbs have germinated and are more likely to be visible. Any seeding or cactus planting is conducted in the fall to capitalize on the start of the rain year and annual precipitation. Invasive plant management targets plants prior to producing seed to maximize management efficacy.

Table 2. FY 2026 anticipated invasive plant species treatment schedule.

Target Species	Anticipated Treatment Period*
Eucalyptus (<i>Eucalyptus</i> spp.)	October – December
Acacia (<i>Acacia</i> spp.)	October – December
Castor bean (<i>Ricinus communis</i>)	October – December
Tree tobacco (<i>Nicotiana glauca</i>)	October – December
Mustard spp. (<i>Brassica nigra</i> and <i>Hirschfeldia incana</i>)	January – April
Poison hemlock (<i>Conium maculatum</i>)	February – May
Bristly oxtongue (<i>Helminthotheca echioides</i>)	February – May
Malta star thistle (<i>Centaurea melitensis</i>)	March – May
Artichoke thistle (<i>Cynara cardunculus</i>)	May – July

*Treatment periods informed by literature (DiTomaso et al. 2013) and field experience of staff.