

From: [Turner, Jennifer@Wildlife](mailto:Turner.Jennifer@Wildlife)
To: [DALTON, KELLY M.](#)
Subject: Fly Field Closure
Date: Monday, March 20, 2023 11:51:09 AM
Attachments: [Draft FVP Flying Field Closure Report March 2023.docx](#)

Hello Kelly,

In response to our conversation a few weeks ago and our most recent email exchange, CDFW would be supportive if the City was to eliminate the model aircraft flying activity in Fairview Park. As a State Trustee Agency for natural resources sees the current activities at Fairview Park as potentially adverse to a variety of sensitive plant and wildlife species as well as valuable habitat types, including vernal pools, coastal sage scrub, and riparian vegetation. Currently, the designated model aircraft flying area directly overlaps with these habitats.

Sensitive wildlife species are found in and adjacent to the designated flying area, including burrowing owl (*Athene cunicularia*; CDFW Species of Special Concern (SSC)), white-tailed kite (*Elanus leucurus*; Fully Protected), northern harrier (*Circus hudsonius*; SSC), coastal California gnatcatcher (*Polioptila californica californica*; SSC, Federal Endangered Species Act (ESA) listed-threatened), San Diego fairy shrimp (*Branchinecta sandiegonensis*; Federal ESA listed-endangered), and Riverside fairy shrimp (*Streptocephalus woottoni*; Federal ESA listed-endangered). Sensitive plant species in and adjacent to the flying area include San Diego button celery (*Eryngium aristulatum* var. *parishii*; California Endangered Species Act listed-endangered, Federal ESA listed-endangered, California Rare Plant Rank (CRPR) 1B.1), Orcutt's grass (*Orcuttia californica*; Federal ESA listed-endangered, CRPR 1B.1), , prostrate navarretia (*Navarretia prostrata*; CRPR 1B.2), and small-flowered microseris (*Microseris douglasii* ssp. *platycarpha*; CRPR 4.2).

CDFW would like to express our support for full closure of the flying field due to impacts to sensitive biological resources. Small, unmanned aircraft have high potential to disturb sensitive avian species and can cause physiological stress and decreases in reproduction and survival (Mulero-Pázmány et al., 2017). We are especially concerned about impacts to raptor species which forage on the mesa near the flying field and may mistake a model craft for a competing predator. Smaller birds such as coastal California gnatcatcher may also identify craft as birds of prey; similar instances with other species have occurred locally. For example, in 2021, a drone crash led to the abandonment of approximately 1,500 elegant tern nests at CDFW-owned-and-managed Bolsa Chica Ecological Reserve, only seven miles northwest of Fairview Park. We are concerned that continued operation of the flying field could lead to similar direct and indirect impacts to sensitive avian resources there.

Fairview Park supports one of the last coastal terrace vernal pools complexes in Orange County. Conservation and management of the San Diego fairy shrimp and its habitat in Fairview Park and other vernal pool complexes in the Los Angeles Basin-Orange Management Area is one of the criteria identified for recovery of the San Diego fairy shrimp in the U.S. Fish and Wildlife Service's Recovery Plan for Vernal Pools of Southern California. Vernal pools in Fairview Park also support several plant species that are locally rare (City 2008; Chung 2010). Model aircraft activity at the flying field results in degradation of vernal pool habitats at Fairview Park when uncontrolled landings and associated vegetation trampling occur. For the above reasons, CDFW would be in support of a closure which

would eliminate this source of pedestrian disturbance for the sensitive habitats present on site.

If you have any questions or comments regarding this email please contact me directly.

Sincerely,

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