



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



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December 7, 2017
Sent by email

Mr. John Helmer
Contract Planner
City of Escondido
201 North Broadway
Escondido, CA 92025

Subject: Draft Environmental Impact Report for the proposed Safari Highlands Ranch Project and Citywide Sphere of Influence Update, City of Escondido, California (City Case File No. SUB 15-0019; ENV 15-0009. SCH No. 2015091039)

Dear Mr. Helmer

We, the U.S. Fish and Wildlife Service (Service), have reviewed the above referenced Draft Environmental Impact Report (DEIR) dated October 16, 2017, prepared for the City of Escondido (City). The comments provided herein are based on information in the subject document and associated materials; our knowledge of sensitive and declining plant and animal species and vegetation communities in San Diego County (County); and our participation in regional conservation planning efforts. We previously responded to the Notice of Preparation (NOP) for the subject project in a letter dated October 9, 2015.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*).

On March 17, 1998, we issued a section 10(a)(1)(B) permit pursuant to the Act for the County's Multiple Species Conservation Program (MSCP) Subarea Plan (Subarea Plan). The Subarea Plan is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species and the preservation of natural vegetation communities within the southwestern subregion of the County. The MSCP and associated Subarea Plan also address the loss of covered species and their habitats due to the direct, indirect, and cumulative impacts associated with land development. The Subarea Plan and its associated Implementing Agreement and section 10(a)(1)(B) permit are the means by which the County has obligated to assemble a regional preserve and to mitigate for impacts to covered species and their habitats.

In addition, we, the County, and the California Department of Fish and Wildlife entered into a planning agreement (Agreement; revised and amended 2014) for development of the North

County Multiple Species Conservation Program (NCMSCP) to address regional conservation needs and future planned development in north San Diego County. The Agreement includes an interim review process for the signatories to ensure that projects do not compromise conservation goals and objectives prior to the completion of the NCMSCP.

The 1,100-acre project site is located within unincorporated San Diego County (County) along the southeastern boundary of the City of Escondido. The southern ~700 acres of the project site are located within the Metro-Lakeside Jamul segment of the County's approved Subarea Plan and the northern ~400 acres of the project site are within the County's draft NCMSCP boundary. The proposed project is located within the Pre-approved Mitigation Area (PAMA) of the Subarea Plan and the draft NCMSCP. In both the Subarea Plan and the draft NCMSCP, the PAMA is the area targeted to assemble a regional preserve and conserve covered species.

The proposed project includes the annexation of the entire project site into the City of Escondido and the subsequent construction of 550 single-family residential units, a community center, City fire station site, public and private streets, an onsite storm water control system including 10 drainage basins, 9.3 miles of public trails, and fuel modification zones. Implementation of the proposed project would permanently impact 367 acres, including 197 acres of coastal sage scrub (CSS) and coastal sage scrub-chaparral transitional habitat. An additional 63 acres of CSS will be maintained and thinned within the proposed Fuel Modification Zone (FMZ) II. The project applicant proposes to mitigate these impacts through the designation of 629 acres of onsite biological open space and the purchase of an additional 31 acres of CSS off site. No mitigation is proposed for impacts within the FMZ II.

Based on our review of the DEIR, the proposed project is not consistent with the conservation goals of the Subarea Plan or the Interim Review Process Procedures outlines in Exhibit B of the Planning Agreement for the NCMCP. The project site encompasses one large contiguous block of high quality and very high quality native habitat that currently supports a significant population (5 pairs or more) of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*, gnatcatcher) and Englemann Oak (proposed for coverage under the NCMSCP), which are targeted for conservation in the Subarea Plan and the NCMSCP.

In the context of the Subarea Plan, the proposed project site is located within the Hodges Reservoir-San Pasqual Valley "core" biological resource area. Core areas are the foundation for the regional preserve network and are defined as "areas generally supporting a high concentration of sensitive biological resources, which, if lost or fragmented, could not be replaced or mitigated elsewhere." In reference to the biological resource core areas, the Subarea Plan (section 4.2.2) highlights their importance by stating "Conservation will be employed to the maximum extent practicable within these sensitive resource areas".

As currently designed, the proposed project would increase fragmentation within the larger block of habitat, directly impact a core population of gnatcatchers, and further constrain wildlife movement within an area targeted for conservation by the County in their Subarea Plan. In order to meet the conservation goals of the Subarea Plan, we recommend that the project be

re-designed to conserve additional CSS in a configuration that minimizes impacts to the onsite gnatcatcher population and retains the site's biological value within an identified core resource area as was anticipated. The preserve design (PAMA) for the Subarea Plan is based on the same preserve design principles that were outlined in the southern California Natural Community Conservation Planning Guidelines; therefore, we encourage these same principals be used to revise the proposed project footprint:

- Larger preserves are better: Large blocks of habitat containing large populations of the target species are superior to small blocks of habitat containing small populations.
- Keep preserve areas close: Blocks of habitat that are close to one another are better than blocks of habitat far apart.
- Keep habitat contiguous: Habitat that occurs in less fragmented, contiguous blocks is preferable to habitat that is fragmented or isolated by urban lands.
- Link preserves with corridors: Interconnected blocks of habitat serve conservation purposes better than do isolated blocks of habitat. Corridors or linkages function better when the habitat within them resembles habitat that is preferred by target species.
- Preserves should be diverse: Blocks of habitat should contain a diverse representation of physical and environmental conditions.
- Protect preserves from encroachment: Blocks of habitat that are roadless or otherwise inaccessible to human disturbance serve to better conserve target species than do accessible habitat blocks.

Additionally, the Subarea Plan (Section 4.2.1) also includes specific goals and criteria for the conservation of core and linkage areas within the Metro-Lakeside-Jamul segment that builds off the broader principles summarized above. Two criteria that are specifically relevant to this project that we recommend be followed are:

- Provide for the conservation of spatially representative (e.g., north of I-8 vs. south of I-8) examples of extensive patches of coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.
- Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

As proposed, the project design is inconsistent with the principles and criteria used to develop the Subarea Plan because all three movement corridors identified on site would be impacted (one would be completely blocked while the other two bisected) and the largest tract of the proposed onsite open space would essentially be surrounded by development. In addition, the proposed onsite preserve is comprised largely of lower quality habitat on steep, dry slopes; includes numerous small, fragmented areas of open space; and is subject to over 19 miles of edge effects. These direct and indirect impacts of fragmentation and edge effects associated with the proposed

project (development, roads, and recreational practices) on the viability of the proposed onsite open space and the ability for wildlife movement through the site have not been adequately addressed in the DEIR.

Section 4.3.2.1 of the County's Subarea Plan states that... *The habitat value of a biological resource core area is significantly degraded if 25 percent of the biological core area (500 acres or more in size) is impacted.* Approximately 562 acres of CSS occur on site, almost entirely within the Subarea plan boundary. The CSS on site is located within a contiguous block of primarily *moderate, high, and very high quality* gnatcatcher modeled habitat that extends off site to largely undeveloped lands north, south, and east of the project site. Currently, the project site supports at least five gnatcatcher territories. The project, as proposed, will impact more than 25 percent of the CSS, as well as the other native habitat on the property, and degrade the existing wildlife corridors through the site; therefore, the conclusion in the DEIR that the proposed project would result in less than significant impacts to the MSCP and the County's existing Subarea Plan is not supported

The 400 acres of the project site located within the draft NCMSCP PAMA represents one of the few remaining opportunities to establish a core habitat area for the NCMSCP preserve. It also supports extensive Englemann oak woodland that will be impacted by the proposed project. The current project design would detrimentally affect the future NCMSCP preserve in a manner similar to the proposed project's impact on the existing Subarea Plan. Although the County is still developing specific goals and objectives for the NCMSCP, we anticipate that similar preserve design principles will apply across the landscape to ensure that the two subarea plans work together to ensure conservation of the native habitat and species they are designed to protect. Therefore, we recommend that the northern portion of the project be re-designed to minimize impacts to the large block of chaparral, Engelmann oak woodland, and wildlife corridors.

Given the overall high biological value of the site, we recommend that the project be reconfigured in accordance with the above described standard preserve design principles to provide a larger amount of conservation on site and to more closely meet the targeted 75 percent conservation goal of the PAMA within the existing Subarea Plan and meet the preserve design principals for the future NCMSCP preserve.

We appreciate the opportunity to provide comments on the subject project and look forward to further coordination with the City and County on this project. If you have questions regarding this letter, please contact me at (760) 431-9440.

Sincerely,

G. Mendel Stewart
Field Supervisor

Cc:

Mark Wardlaw, County of San Diego

Peter Eichar, County of San Diego

Gail Sevrens, California Department of Fish and Wildlife