



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



In Reply Refer To:
FWS-16B0010-16CPA0003

OCT 09 2015

Mr. Jay Petrek
Assistant Planning Director
City of Escondido
Planning Division
201 North Broadway
Escondido, California 92025

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Safari Highlands Ranch (City Case # SUB 15-0019, ENV 15-0009), City of Escondido, County of San Diego, California

Dear Mr. Petrek:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR), dated September 11, 2015. The comments provided herein are based upon information provided in the NOP and associated reference materials, our knowledge of sensitive and declining vegetation communities, and ongoing regional habitat conservation planning in the County of San Diego (County).

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

The 1,100-acre project site is located along the southeastern boundary of the City of Escondido within the unincorporated area of the County. The southern half of the project site is within the County's approved Multiple Species Conservation Program Subarea Plan (Subarea Plan) and the northern half of the project site is within the County's draft North County Multiple Species Conservation Program (NCMSCP). 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. The entire project site is proposed to be annexed into the City of Escondido.

On March 17, 1998, the Service issued a section 10(a)(1)(B) permit pursuant to the Act for the Subarea Plan. The Subarea Plan is a comprehensive, long-term habitat conservation planning program that addresses the needs of multiple species and the preservation of natural vegetation communities within the southwestern subregion of the County. The MSCP also addresses 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, the County, Service, and the California Department of Fish and Wildlife entered into a planning agreement (Agreement; revised and amended 2014) for development of the NCMSCP to address regional conservation needs and future planned development in north San Diego County. The Agreement includes an interim review process to ensure that projects do not compromise conservation goals and objectives prior to the completion of the NCMSCP.

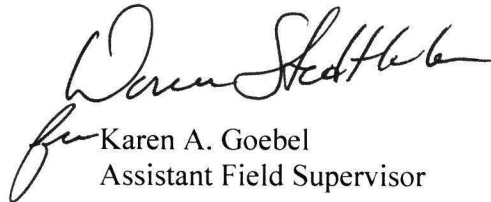
Based on our review of the NOP and the associated documents, our primary concern is that the proposed development design and the proposed annexation of lands currently within PAMA are not consistent with the planning and conservation goals of the Subarea Plan and draft NCMSCP. The County has identified a target level of conservation for lands within PAMA (both the Subarea Plan and draft NCMSCP) at 75 percent; however, the project, as proposed, would achieve only about 63 percent conservation. We acknowledge that the 75 percent conservation is an average across the preserve, where some areas will be conserved at higher levels and others at lower levels. This level of conservation is our starting point as we review each proposed project that is located within the PAMA boundaries. We then factor in other variables including the importance of the project area to identified biological core and linkage areas within the preserve and the presence of critical biological resources.

The proposed project site is located within the Hodges Reservoir-San Pasqual Valley Core Resource Area of the Subarea Plan, and the draft NCMSCP Planning Unit 8 (Daley Ranch-Lake Wohlford Core Area). The project site encompasses a large contiguous block of high quality and very high quality native habitat that currently supports the coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and other sensitive species targeted for conservation in both the Subarea Plan and the NCMSCP. In addition, the proposed project site provides a core block of live-in habitat for the gnatcatcher that connects PAMA in the Subarea Plan to high value habitat within the draft NCMSCP PAMA. Conservation of contiguous blocks of habitat is essential because studies suggest that the gnatcatcher, in particular, is highly sensitive to the effects of habitat fragmentation and development activity (Atwood 1990; ERCE 1990 (Ogden) unpublished data). As currently designed, the proposed project would increase fragmentation of natural habitats including, but not limited to, coastal sage scrub within the Subarea Plan (i.e., Hodges Reservoir-San Pasqual Valley Core Resource Area) and the draft NCMSCP Planning Unit 8.

We recommend that the DEIR address the impacts to the Subarea Plan and draft NCMSCP preserve systems (i.e., PAMA) that would result from the proposed annexation and subsequent development of the project. The DEIR should also include an analysis of project alternatives that are consistent with the conservation goals for the PAMA (i.e., 75 percent conservation of lands designated as PAMA), and that would maintain a large block of un-fragmented habitat on site.

We appreciate the opportunity to comment on the NOP and request that we be provided a copy of the DEIR when it becomes available. If you have questions regarding our comments or would like to schedule a meeting to discuss the proposed project or potential alternatives, please contact Michelle Durflinger at 760-431-9440, extension 356.

Sincerely,



Karen A. Goebel
Assistant Field Supervisor

cc:

Gail Sevrens, California Department of Fish and Wildlife, San Diego, CA

Mindy Fogg, County of San Diego Planning and Development Services, San Diego, CA

LITERATURE CITED

Atwood, J. L. 1990. Status review of the California gnatcatcher (*Polioptila californica californica*). Unpublished technical report, Manomet Bird Observatory, Manomet, Massachusetts. 79 pp.

[ERCE] ERC Environmental and Energy Services (Ogden). 1990. Phase I report, Amber Ridge California gnatcatcher study. Prepared for Weingarten, Siegel, Fletcher Group, Inc. April. 26 pp.