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December 22, 2017

Mr. John Helmer, Contract Planner  
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**Subject: Comments on the Draft Environmental Impact Report for the 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:

The California Department of Fish and Wildlife (Department) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Safari Highlands Ranch Project (Project) and Citywide Sphere of Influence Update received on October 16, 2017. The comments provided in this letter are based on information in the subject document and associated materials; multiple meetings and discussions with County of San Diego (County) and City of Escondido (City) staff, and representatives of the Project applicant, including a site visit on May 24, 2017; our knowledge of sensitive and declining plant and animal species and vegetation communities in the County; and our participation in regional conservation planning efforts.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code, and administers the Natural Community Conservation Planning (NCCP) program. In 1998, the Department and the U.S. Fish and Wildlife Service (Service) (collectively the Wildlife Agencies) approved and permitted the County's Multiple Species Conservation Program Subarea Plan (SC-MSCP) for unincorporated lands in south San Diego County. In addition, the County signed a Planning Agreement with the Wildlife Agencies for the development of the North County Multiple Species Conservation Program Plan (NC-MSCP), and this NCCP/HCP is currently in development for unincorporated lands in northern San Diego County. The City of Escondido also participated in the NCCP/HCP program and prepared a draft Subarea Plan under the Multiple Habitat Conservation Program (MHCP) Subregional Plan that was circulated for public review in May 2001; however, the City's Subarea Plan was never adopted by the City Council or submitted to the Wildlife Agencies for permitting and is therefore considered inactive.

The Project site consists of approximately 1,098 acres located in unincorporated northern San Diego County, just north of the San Diego Zoo Safari Park and east of Cloverdale Road. The entire Project site is located within the County's jurisdiction and straddles the SC-MSCP/NC-MSCP boundary; however, the site is immediately adjacent to the boundary of the City of Escondido within the City's General Plan Specific Plan Area #4, and the Project proposes to annex all 1,098 acres into the City, subject to the Local Agency Formation Commission's (LAFCO's) approval. The Project would include the development of 550 single-family residential units in seven neighborhoods across approximately 327 acres, a community center, a new 1.9-



acre City fire station, a 66.8-acre system of new public and private streets, and an on-site storm water control system including 10 drainage basins. Public and private recreation facilities on site include 6.0 acres of private parks and recreation areas (pools, tennis courts, etc.) and 9.3 miles (7.3 acres) of public trails. Primary access to the Project site would be provided by a single entrance along Safari Highlands Ranch Road, a new road proposed to intersect Rockwood Road between Old Ranch Road and Vistamonte Avenue. Two additional new roads, one connecting to Stonebridge Road in the north and one connecting to Zoo Road in the south, as well as upgrades to the existing connection roads, have been proposed to provide emergency access to the site.

The Project site is located in the westernmost portion of the mountains that form the northern boundary of San Pasqual Valley, an east-west oriented valley between the City and the unincorporated community of Ramona. The Project site is undeveloped, with on-site topography composed mostly of rolling hills and valleys dominated by rock (granodiorite) outcroppings, with elevations ranging from approximately 400 feet above mean sea level (AMSL) to approximately 1,800 feet AMSL. Various dirt roads and trails traverse the Project site and these are the only areas on site characterized as disturbed habitat. Surrounding land uses to the north, south, and east include large-lot, single-family residential development, agricultural uses, and both designated open space and undeveloped private property. In addition, the San Diego Zoo Safari Park is located directly south of the project. Large residential communities and other development dominate the landscape to the west of the Project site.

The proposed Project would permanently impact 346.9 acres on site, including 186.6 acres of coastal sage scrub (CSS) and coastal sage scrub-chaparral transitional habitat, 148.18 acres of chaparral, 1.81 acres of oak woodland, 0.74 acre of riparian habitat, 0.09 acre of ragweed mesic meadow, and 2.2 acres of non-native grassland. Permanent impacts off site would total 31.82 acres and include impacts to coastal scrub sage, chaparral, riparian habitats, and non-native grassland. A portion of the off-site impacts will occur on lands within the City of San Diego's MSCP Subarea Plan and non-MSCP lands. The applicant proposes to mitigate these impacts through the designation of 629.09 acres of on-site biological open space and the purchase of an additional 31.41 acres off site. Furthermore, the applicant proposes to establish 128.6 acres of Home Owner Association (HOA) maintained open space, located within Fuel Modification Zone (FMZ) II.

The loss of CSS and sage-scrub chaparral would also impact the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; gnatcatcher). In addition to permanent impacts, the Project will temporarily impact 121.52 total acres on site, including impacts to CSS and CSS-chaparral transitional habitat, chaparral, oak woodland, riparian habitats, ragweed mesic meadow, and non-native grassland, and 1.37 total acres off site, including impacts to CSS and mulefat scrub. The applicant proposes to restore the temporarily impacted areas through the development and implementation of a Habitat Revegetation Plan (HRP).

The proposed Project site is located within the Pre-Approved Mitigation Areas (PAMA) of both the SC-MSCP and the draft NC-MSCP. Additionally, the southern section of the property is also considered a Biological Resource Core Area (BRCA) due to its location within PAMA of the SC-MSCP, specifically within the Metro-Lakeside-Jamul segment. Section 4.2.2 of the SC-MSCP states that, "conservation will be employed to the maximum extent practicable within these sensitive resource areas" (County of San Diego 1997). Similarly, the umbrella plan for the SC-MSCP Subarea Plan, the City of San Diego's Multiple Species Conservation Program (MSCP)

Subregional Plan, identifies the Project site as being within the Hodges Reservoir/San Pasqual Valley Core Biological Resource Area. According to the MSCP, these core areas are "areas generally supporting a high concentration of sensitive biological resources, which, if lost or fragmented, could not be replaced or mitigated elsewhere" (City of San Diego 1998). The MSCP Subregional Plan identifies twelve "core" reserves of very large blocks of gnatcatcher-occupied coastal sage scrub that should be conserved, including one in Escondido/San Pasqual Valley. The Project site is a substantial component of this core reserve area, as evidenced by its location, the large and contiguous block of moderate to very high quality gnatcatcher modeled habitat (i.e., favorable slope, aspect, elevation, and vegetation composition), and the presence of multiple gnatcatcher territories both on and adjacent to the site.

In addition to core areas, the MSCP identifies linkage areas that connect Core Biological Resource areas within the MSCP area or provide connections to habitat outside the MSCP area. Three of these linkages include connections to San Pasqual Valley and are in proximity to the Project site. Likewise, the NC-MSCP portion of the property is also located within or adjacent to two draft NC-MSCP wildlife movement corridors, which facilitate wildlife movement through the NC-MSCP plan area and contiguous natural landscapes.

We offer the following comments and recommendations to assist in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the Project is consistent with annexation requirements for lands within the SC-MSCP and draft NC-MSCP plan areas.

1. Effects on Regional Conservation Planning. Our primary concern is that the proposed Project is not consistent with planning and conservation goals identified for the County's approved and draft regional conservation plans. As detailed in the Department's response to the Notice of Preparation (NOP) of the DEIR, both the Implementing Agreement for the approved SC-MSCP and the Planning Agreement for the draft NC-MSCP address the process and requirements for the annexation of lands within the County's jurisdiction to another jurisdiction. Both documents state that an agreement must be reached between the County, the annexing jurisdiction, and the Wildlife Agencies to ensure that—amongst other things—any development of the annexed lands proceeds in accordance with planning and conservation goals identified for the SC-MSCP and draft NC-MSCP. In our review, we have found that the proposed Project design, proposed avoidance and mitigation measures, and associated open space preserve configuration fall short of meeting key conservation planning goals. This is further described below.
2. Impacts to CSS and California Gnatcatchers. The proposed Project design would permanently impact two of the five gnatcatcher territories on site. Two additional territories are considered to only be temporarily impacted in the DEIR. To mitigate for these impacts, the Project proposes to conserve approximately 339 acres (60%) of the CSS on site, including 189.06 acres of assumed gnatcatcher occupied habitat. An additional 31.41 acres of CSS off site would be conserved in order to fulfill the 1.5:1 mitigation ratio requirement for Project impacts to CSS and to meet the 64% CSS conservation target established for lands within the Metro-Lakeside-Jamul segment of the SC-MSCP. According to the DEIR, only 265.1 of the 561.95 acres of CSS on site are assumed to be gnatcatcher-occupied, which is based on the use of a 1,000 ft. AMSL limit for gnatcatcher suitable habitat. However, gnatcatcher occupancy has been



measured up to 1,500 ft. AMSL (higher in other counties), and 1,200 ft. AMSL was used as the upper threshold for identifying "high" quality habitat in the gnatcatcher habitat evaluation model. Therefore, we disagree with the estimate of impacts to gnatcatcher-occupied CSS presented in the DEIR.

The proposed mitigation for impacts to CSS and gnatcatcher focus primarily on meeting ratio requirements and percent conservation goals. We acknowledge the importance of these target conservation goals and the Project applicant's efforts to meet them; however, purely meeting the numerical acreage requirement does not necessarily ensure that biological value and functionality are maintained. Therefore, we recommend that the Project also emphasize the conservation of the on-site gnatcatcher core (the existing five or more territories), and conservation of the high and very high modeled habitat capable of supporting a gnatcatcher population for the long-term.

A number of conservation and planning goals correspond with the various above-described designations that overlay the proposed Project site, the most important of which relates to CSS and gnatcatcher. As stated above, 561.95 acres of CSS occur on site, almost entirely within the SC-MSCP portion of the property. 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. According to the NCCP Conservation Guidelines (CDFG 1993), habitat that supports a local population of five or more pairs of gnatcatchers should be considered significant. Currently, the Project site supports at least five gnatcatcher territories. In addition, conserved open space associated with the Vistamonte development, located south of and immediately adjacent to the Project site, and San Pasqual Battlefield Historic State Park, located just north of State Route 78 and southeast of the Project site, both support three or more gnatcatcher territories. It should be further noted that the scrub habitat in this area is recovering from a severe wildfire event that occurred in 2007 (Witch Fire) and completely burned the site. Preliminary results from a gnatcatcher post-fire recovery study suggest that CSS and subsequent gnatcatcher population recovery in burned areas has been taking place across a longer time scale than previously thought (B. Kus, USGS. Pers. comm. 2017). Therefore, as the habitat quality continues to improve, this area may be expected to support a greater number of gnatcatcher territories in the future than currently occur. Additionally, it has been found that the high and very high modeled habitat was much more likely to be found to be occupied by gnatcatchers than low and medium quality modeled habitat (Winchell and Doherty 2008). Furthermore, surveys in Orange County found that high quality CSS with comparatively low slopes were more reliably occupied by gnatcatchers and were more likely to support a high density of gnatcatchers which are more likely to persist through periods of ecological stress such as prolonged drought (Hamilton 2006). Hamilton (2006) concluded "Therefore, in order to establish a habitat reserve system capable of maintaining California Gnatcatcher populations over the long term, the available evidence suggests that planners should make it a priority to preserve shallow-sloped areas that are vegetated with appropriate coastal sage scrub assemblages." Considering the above information and with a principal goal of maintaining a long-term viable core gnatcatcher population in San Pasqual Valley as envisioned in the MSCP Subregional Plan, the Department recommends that development largely be designed to avoid impacts to sage scrub below the 1,200-foot elevation contour and corresponding



milder slopes, thereby avoiding impacts to most of the "high" and "very high" modeled habitat, as well as the gnatcatcher locations that have been identified on site.

3. Wildlife Movement and Preserve Design. As described above, the Project is located within, or in proximity to, several SC-MSCP and draft NC-MSCP linkages/wildlife movement corridors. The purpose of identifying these areas was to ensure that they would be targeted for conservation in order to maintain functional wildlife movement throughout the region. Furthermore, three local wildlife movement corridors have been identified on site. As such, the proposed Project design should reflect the significance of the Project site for wildlife movement and apply standard preserve design principles to ensure maximum functionality of the on-site open space.

The following criteria are included in the southern California NCCP Guidelines and reflect standard preserve design principles, which we believe are applicable for the level of development that was anticipated for this area when the MSCP was being planned:

- A. 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.
- B. Keep preserve areas close: Blocks of habitat that are close to one another are better than blocks of habitat far apart.
- C. Keep habitat contiguous: Habitat that occurs in less fragmented, contiguous blocks is preferable to habitat that is fragmented or isolated by urban lands.
- D. 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.
- E. Preserves should be diverse: Blocks of habitat should contain a diverse representation of physical and environmental conditions.
- F. 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.

The proposed Project design is inconsistent with these principles. The proposed Project design extends the entire north-south length of the site, impacts all three local movement corridors identified on site, and effectively encircles the largest tract of proposed on-site open space within on-site development to the north, south, and east, and adjacent off-site development to the west. The on-site preserve resulting from the current design is comprised largely of lower quality habitat on steep, dry slopes, includes numerous small and fragmented areas of open space, and is subject to over 19 miles of edge effects. The Department does not believe that the DEIR adequately addresses the direct and indirect impacts of fragmentation and edge effects associated with the proposed Project design, including residential development, roads, and recreational practices, on the viability of the conserved on-site open space and wildlife movement through the site. As such, we disagree with the DEIR conclusion that the proposed Project would result in less than significant impacts to wildlife movement. In order to alleviate the constraints on movement and our concerns regarding the long-term viability of the proposed open space, we recommend that portions of the proposed Project be reconfigured in a manner that more closely reflects the standard preserve design principles listed above.



Additionally, recent studies have been performed to identify measures to enhance the ability of smaller wildlife, including reptile and amphibian, species to use undercrossings (Tracey et al. 2014; Ontario Ministry of Natural Resources and Forestry 2016). The Project proposes ten wildlife crossing at key points primarily along the main access road. It has been proposed that the design of five of these would include a minimum openness ratio of 0.75 in order to facilitate movement of larger wildlife. We recommend that measures for smaller wildlife species described in the above cited studies also be included in the design of these undercrossings to ensure they are functional for all sizes of wildlife.

4. PAMA and BRCA Percent Conservation Targets. Both the SC-MSCP and draft NC-MSCP have identified a target level of conservation for lands within the PAMA at 75 percent. A similar goal exists for BRCAs within the Metro-Lakeside-Jamul segment of the SC-MSCP. As stated in Section 4.3.2.1 of the SC-MSCP, which details the project review process for projects within the Metro-Lakeside-Jamul segment, a project would be considered inconsistent with the IA if it would result in significant degradation of the biological value of a BRCA. Biological value is considered significantly degraded if 25 percent of the core area (500 acres or more in size) is impacted (County of San Diego 1997). The Project, as proposed, would achieve about 57 percent conservation of the property, including approximately 60 percent of the land within the SC-MSCP and approximately 53 percent of the land within the NC-MSCP. We acknowledge that the 75 percent conservation target is an average across the PAMA, where some areas will be conserved at higher levels and others at lower levels. We also consider other factors including the importance of the project area to identified biological core and linkage areas within the preserve, as well as the presence of critical biological resources. As discussed above, the proposed Project site is located within several identified biological core and linkage areas, and supports a significant population of gnatcatchers and gnatcatcher-suitable CSS habitat, as well as other sensitive species and habitats. Given the overall high biological value of the site, we again recommend that the project be reconfigured in accordance with the above-described preserve design principles to provide a larger amount of conservation on site and to more closely meet the targeted 75 percent conservation goal. Furthermore, as mentioned above, conservation of the large block of high and very high modeled gnatcatcher habitat in the southern third of the property should be a particular priority of an approved site design.
5. Fire Fuel Impacts. The Project proposes to establish 128.6 acres of HOA maintained open space. This open space would be primarily comprised of revegetated habitat and would be subject to thinning for fuel modification purposes. This acreage is currently analyzed as temporary impact and no mitigation for impacts associated with the maintenance of the fuel modification zone has been proposed. This is inconsistent with current planning practices because fire-fuel management practices (i.e., thinning) can be subject to change; all new developments should be conditioned to include all fuel management zones within the development footprint. Therefore, the fuel management acreage should be added to the development footprint and mitigated consistent with the requirements of other permanent impacts.
6. Oak Tree Impacts. The Department is concerned about proposed impacts and mitigation measures to oak trees, particularly Engelmann oak (*Quercus engelmannii*), which is a County List D Sensitive Plant Species and is proposed for coverage under the



draft NC-MSCP. Five hundred twenty-two (522) individual Engelmann oaks were mapped on the proposed Project site, the majority occurring within the draft NC-MSCP portion of the site. Additional individuals also occur within the oak woodland and oak riparian habitats mapped on site. The Biological Technical Report (BTR) for the proposed Project states that individual Engelmann oaks were mapped as such because they occurred in sparser densities compared to the coast live oaks (*Quercus agrifolia*) on site.

The Department does not believe the mitigation measures for impacts to both individual coast live oaks and Engelmann oaks to be sufficient. Mitigation measure BIO-7 states that unavoidable construction activities may occur within the 50-foot oak root zone buffer for some trees. We recommend that all individual oaks and oak woodland or riparian habitat that cannot be provided the appropriate buffer be considered impacted and mitigated accordingly. The Project proposes to impact 305, or over 58%, of the 522 individually mapped Engelmann oaks on site, as well as numerous individually mapped coast live oaks. Currently, the DEIR does not propose replacement for any individually impacted oaks. The Department disagrees with this approach because even scattered oaks within other vegetation communities provide valuable habitat to diverse wildlife species. Furthermore, this is inconsistent with City's guidelines regarding oak tree replacement, as detailed in Article 55, Section 33-1069 of the City's zoning code. We recommend that all individually impacted oaks not included in the 25.46 acres of impacts to oak riparian and oak woodland be replaced in-kind at a minimum 3:1 ratio, the same ratio proposed for the impacts to oak woodland and oak riparian habitat. Details on a replacement strategy should be included in the proposed Habitat Revegetation Plan, which we request be submitted to the Department for review and approval prior to issuance of a grading permit. We recommend a minimum 10-year monitoring period for oak mitigation plantings and requiring measurable success criteria to ensure the establishment of a comparable distribution of oaks to that being impacted.

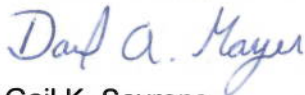
7. Western Spadefoot Toad. According to the BTR, numerous western spadefoot toad (*Spea hammondi*, spadefoot) metamorphs were observed on site along the main access dirt road and the main drainage, presumably dispersing from an off-site breeding pond. The BTR recognizes there is a high potential for spadefoot to occur across the site, and therefore the species has been considered significantly and permanently impacted by the proposed Project. Spadefoot is currently listed as a California Species of Special Concern, and is receiving increased recognition for including essential habitat elements in conserved open space. The Department recommends additional consideration be provided for this species in order to address the need for sufficient breeding and upland habitat, and design features to minimize potential deaths from new roads or other development features. In the event that additional spadefoot breeding pools are found within 500 feet of the development footprint, the Project applicant should consult with the Department to discuss possible relocation, forced dispersal, or alternative avoidance measures.
8. Bat Species. The draft NC-MSCP proposes to cover two bat species, the pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii pallascens*). According to the BTR, focused surveys to locate roosting bats were not performed due to a presumed low potential for bats to forage or roost within trees within the Project site. To ensure that potential impacts to these proposed covered species



have been thoroughly evaluated, we recommend that focused daytime surveys for potential roosting spots, including trees and rock outcroppings, as well as nighttime surveys for foraging behavior, be performed. This information is necessary in order to include appropriate monitoring and management measures in the subsequent Resource Management Plan for the on-site conserved habitat.

We appreciate the opportunity to provide comments on the subject project and look forward to further coordination with the City, applicant, County, and Service on this project in order to meet a project design that is consistent with the goals of past and ongoing regional conservation planning. This is critical in order for the Department to support the approval of the proposed annexation from the County into the City. If you have questions regarding this letter, please contact Carol Williams of the Department at [Carol.Williams@wildlife.ca.gov](mailto:Carol.Williams@wildlife.ca.gov) or (858) 637-5511.

Sincerely,



*For*

Gail K. Sevens  
Environmental Program Manager  
South Coast Region

cc: Karen Goebel, U.S. Fish and Wildlife Service, Carlsbad

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