

A-3 California Department of Fish and Wildlife

Comment Letter A-3



State of California – Natural Resources Agency
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August 14, 2017

Ms. Ashley Smith
County of San Diego
Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Comments on the Draft Environmental Impact Report, General Plan Amendment, Specific Plan, Rezone, Tentative Map, and Draft Habitat Loss Permit for the proposed Newland Sierra Project, County of San Diego, California (Log No. PDS2015-ER-15-08-001; SCH No. 2015021036. Project Numbers: PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597)

Dear Ms. Smith:

The Department of Fish and Wildlife (Department) has reviewed the Draft Environmental Impact Report (DEIR), General Plan Amendment, Specific Plan, Rezone, Tentative Map, and Draft Habitat Loss Permit (HLP) for the proposed Newland Sierra Project (Project) received on June 15, 2017. The comments provided in this letter are based on information in the documents provided; multiple meetings and discussions with San Diego County (County) staff and representatives of the Project applicant; Megan Jennings' April 2017 Merriam Mountains Wildlife Connectivity Review (Jennings 2017a) and an August 2017 Landscape Connectivity Issue Review of the DEIR (Jennings 2017b); our knowledge of sensitive and declining plant and animal species and vegetation communities in the County; and our participation in regional conservation planning, including working with the County, various consultants, and stakeholders involved with the County's draft North County Multiple Species Conservation Program (NC-MSCP) planning effort.

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. The County has signed a Planning Agreement with the Department and the U.S. Fish and Wildlife Service (Wildlife Agencies) for the development of the draft NC-MSCP, and this NCCP/Habitat Conservation Plan (HCP) is currently in development for unincorporated lands in north San Diego County.

The Project site consists of 51 parcels totaling approximately 1,985 acres located west of Interstate 15, north of Deer Springs Road, and east of Twin Oaks Valley Road within the Twin Oaks Valley and Hidden Meadows communities of the North County Metropolitan Subregional Plan area (southern portion) and the Bonsall Community Planning area (northern portion) of the unincorporated San Diego County (County). The Project would include the development of

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2,135 dwelling units, 81,000 square feet of general commercial uses, a six-acre school site, approximately 36 acres of parks, and 1,209.1 acres of biological open space. Overall, the master-planned community would consist of seven planning areas focused around a town center located off of Deer Springs Road in the southeastern corner of the site and include an extensive trail system including: 6.9 miles of multi-use pathways along the main road; 8.9 miles of internal pathways and trails within neighborhoods; 2 miles of multi-purpose trails through the open space area; and 1.5 miles of secondary trails through the open space area. Access to the Project site would be provided by two main access points along Deer Springs Road, with an additional access point provided at Camino Mayor off of Twin Oaks Valley Road.

The Project site is located within the northern portion of the Merriam Mountains range, a narrow 8.5-mile-long chain of low mountains generally running north-south with a variety of east-west trending ridgelines and scattered peaks. The property is primarily undeveloped with on-site topography composed mostly of hills and valleys dominated by rock (granodiorite) outcroppings, moderate to steeply sloping terrain, and elevations ranging from approximately 660 feet above mean sea level (AMSL) near the northwestern end to approximately 1,750 feet AMSL in the west-central portion of the Project site. Various dirt roads and trails that provide access to each parcel and service roads for existing water infrastructure traverse the Project site. An abandoned quarry is located in the northwest portion of the Project site and an abandoned private landing strip is located in the north-central portion. Surrounding land uses to the north, west, and south of the Project site include large-lot, single-family residential development, agricultural uses, and conserved open space.

The Project site is also located within a core habitat area within the Pre-Approved Mitigation Area (PAMA) of the draft NC-MSCP. Merriam Mountains represents one of only two remaining large blocks (typically 500 acres or greater) of natural habitat in the PAMA west of Interstate 15. Vegetation on the Project site consists predominately of southern mixed chaparral, with interspersed patches of Diegan coastal sage scrub, coast live oak woodlands, and southern willow scrub. The South Fork of Moosa Canyon also runs from the northern to northeastern area of the Project site. In addition, the habitat evaluation maps of the draft NC-MSCP indicate that habitats on and adjacent to the Project site are "moderate," "high," and "very high" habitat quality. Areas to the north, south, east, and west of the site are also identified as PAMA in the draft NC-MSCP.

The proposed Project would permanently impact 776.6 acres on site, including 54.5 acres of coastal scrub, 666.9 acres of chaparral, 6.5 acres of coast live oak woodland, 15.3 acres of riparian habitat, and 15.3 acres of non-native grassland. Permanent impacts off site would range from 70.5-73.2 total acres and include impacts to coastal scrub, chaparral, oak woodland, riparian habitats, and non-native grassland. The applicant proposes to mitigate these impacts through the designation of 1,209.1 acres of on-site biological open space and the purchase of an additional 211.8 acres off site. On-site impacts would also permanently impact the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*, gnatcatcher). The applicant proposes to mitigate impacts to coastal scrub (approximately 56.7 acres) and the gnatcatcher through the County's HLP process. In addition to permanent impacts, the Project will temporarily impact 8.7-9.2 total acres on site and 1.29 total acres off site. The applicant proposes to restore the temporarily impacted areas within designated open space via the development and implementation of a Revegetation Plan.



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As detailed in the Department's response to the Notice of Preparation (NOP) of the DEIR, the Wildlife Agencies have met multiple times with the County to discuss the currently proposed Newland Sierra Project. Based on these meetings, the Department provided a number of tenets to guide any "hardline" agreement negotiations for the Newland Sierra Project. It is important to note that in our meetings it was acknowledged that the Newland Sierra project would be evaluated independently of the formerly proposed Merriam Mountains project, which was not approved by the County Board of Supervisors; therefore, the previous Merriam Mountains Wildlife Agency-approved hardline agreement is not applicable to the proposed Newland Sierra Project. We understand that the County intends to include the Newland Sierra Project preferred alternative as a "hardline-area" in the draft NC-MSCP. However, the Department has not completed its review of the draft NC-MSCP nor how the Newland Sierra alternatives would fit in the regional planning effort, and we believe that a County decision to assume the preferred alternative footprint is consistent with the NC-MSCP is premature. 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 the HLP process, Federal and State endangered species laws/regulations, and ongoing regional habitat conservation planning efforts:

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1. The DEIR analyzes eleven alternatives to the proposed Project, including an Existing General Plan Alternative. Under this alternative, the Project site would be developed under existing General Plan land use designations of Village, Semi-Rural, and Rural Lands. According to the Land Use Element of the County's General Plan, approximately 19.6 acres of the existing property are designated Semi-Rural 10 (SR 10), which allows one dwelling unit per 10 gross acres on land with slopes of less than 25 percent, and one dwelling unit per 20 gross acres on land with slopes greater than 25 percent. Approximately 1,907 acres of the existing property is designated Rural Lands 20 (RL 20), which allows one dwelling unit per 20 gross acres. Approximately 4.64 acres are designated General Commercial (C-1), which allows a maximum intensity of 0.70 floor area ratio in areas designated as Village. Approximately 53.64 acres are designated Office Professional (C-2), which allows a maximum intensity of 0.80 floor area ratio in areas designated as Village.

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The DEIR concludes that this alternative would allow approximately 99 single-family residential dwelling units and 2,008,116 square feet of office professional and commercial space with associated roadways, leach fields for septic systems, and Fuel Modification Zones (FMZs), and would decrease open space by approximately 273 acres in comparison to the proposed Project. According to our understanding of the County's Conservation Subdivision Ordinance, which requires 75% avoidance of resources on lands zoned SR 10, and 80% avoidance on lands zoned RL 20, this conclusion is incorrect. These avoidance criteria would result in the avoidance and protection of approximately 1,539 acres of open space on lands zoned SR 10 and RL 20, a 330-acre increase in open space from the proposed Project. The Conservation Subdivision Ordinance also contains specific requirements that relate to the design of the open space on site. According to the County's "Rural Subdivision Design and Processing Guidelines," Projects subject to the Conservation Subdivision Ordinance are required to:

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- A. Conserve the largest blocks possible of fragmented and interconnected open space;

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- B. Avoid creating slivers of open space or fingers of open space that extend in and around development and provide the lowest amount of interface between open space and development – referred to as maximizing the surface area to perimeter ratio;
- C. Create the maximum amount of connectivity between on- and off-site resource areas;
- D. Maintain patterns of diversity within the landscape such as multiple habitat types, varying topography, agriculture, etc.; and,
- E. Preserve particularly unique and/or sensitive resources in the core of open space areas or such that they are sufficiently buffered to achieve the same practical effect.

These requirements are consistent with the preserve design principles outlined in the Planning Agreement, the NCCP Conservation Guidelines, and the NCCP Act of 2003. The avoided lands shall be protected with an easement dedicated to the County or a conservancy approved by the Director of County Planning and Development Services. Under the application of the Conservation Subdivision Ordinance as described above, the Existing General Plan Alternative would maximize on-site open space and lead to the most biologically sound preserve design alternative. If our understanding is correct, although we have not yet seen a resulting project footprint, it is very possible that we would recommend the adoption of this alternative.

- 2. The DEIR also analyzes three alternatives recommended by the Wildlife Agencies in our NOP responses. These alternatives would minimize project impacts to the draft PAMA; provide for a large, contiguous block of open space in the eastern and northern portion of the property, thereby contributing to assemblage of the San Marcos-Merriam Mountains Core Area; and maintain connectivity between on- and off-site areas designated as draft PAMA and other conservation efforts outside the NC-MSCP planning area. Retaining a core block of habitat on-site as well as connectivity for wildlife throughout the Project site is a primary concern to the Department. There are very few areas remaining in the draft NC-MSCP Plan Area that support blocks of native vegetation that are greater than 500 acres. In addition, as discussed in both of Megan Jennings' connectivity reviews, the proposed Project site's location within the Merriam Mountains serves as a critical stepping-stone between north-south coastal sage scrub patches along the I-15 (Jennings 2017a and 2017b). The proposed Project location is also important for east-west movement between the Merriam Mountains and the San Marcos Mountains. The Department concurs with Jennings' assessment that the project design (including local roads and fire-fuel clearing) and mitigation as proposed do not adequately address direct and indirect Project impacts to the conserved habitat, connectivity, and wildlife movement. The Department recognizes that the NC-MSCP is already severely challenged due to relatively small conserved habitat blocks and often very narrow corridors which would be expected to facilitate wildlife movement. Due to its size and relatively intact habitat, the subject property offers significantly better opportunity to accommodate wildlife movement. However, as proposed, the Project



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design is expected to further adversely affect wildlife movement throughout this western portion of the anticipated NC-MSCP preserve, and compromises the ability to create a resilient reserve system in the area. Additionally, the Project site is located within or adjacent to two draft NC-MSCP wildlife movement corridors and the proposed design is inconsistent with general planning tenets for such corridors. Given the importance of the Project site for wildlife habitat and connectivity, the Department continues to recommend selection of a scaled-back alternative that would limit fragmentation and edge effects within the PAMA in the draft NC-MSCP, and thus preserve a large core block of habitat.

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Under CDFW/USFWS Land Use Planning Alternative A – one of the three Wildlife Agency recommended alternatives – the Town Center, Terraces, and Hillside planning areas, along with associated access roadways, parks, and other improvements, would be eliminated and instead be open space. The remainder of the planning areas (Valley, Mesa, Knoll, and Summit) would remain as proposed under the Project. The DEIR concludes that Alternative A is the Environmentally Superior Alternative, with the exception of the No Project (No Build) Alternative. In the event that the Existing General Plan Alternative is not adopted, given the wildlife habitat and connectivity benefits discussed above, the Department would also support the adoption of this alternative.

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3. The proposed Project is requesting an amendment to the County's Resource Protection Ordinance (RPO) to allow impacts to RPO wetlands and wetland buffers. The RPO defines wetlands as lands that have one or more of the following attributes: (1) lands that periodically support a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) lands in which the substratum is predominantly undrained hydric soil; or (3) lands where an ephemeral or perennial stream is present and whose substratum is predominately non-soil, and where such lands contribute substantially to the biological functions or values of wetlands in the drainage system. As detailed in Table 3 of the draft Resource Protection Plan, the Project would impact 2.13 acres of RPO wetland and 8.7 acres of wetland-buffer on site, as well as 1.49 acres of RPO wetland and 1.10 acres of wetland-buffer off site. The Project proposes to partially mitigate these impacts through avoidance of other RPO wetlands on site; however, these on-site areas would not be suitable to serve as mitigation credit as avoidance is already required per the RPO. As such, additional off-site mitigation should be required in order to fully mitigate impacts to RPO wetlands and wetland-buffers.

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The Project's proposal to amend the RPO creates a concern regarding the ability to meet the conservation goals and objectives established in the NC-MSCP. The RPO is one of several enforcement tools the County has advocated to ensure the build-out of the NC-MSCP Preserve and the conservation of the NC-MSCP Covered Species. Currently, there is no exemption in the RPO that allows impacts to RPO wetlands without commensurate mitigation. The Department is concerned that allowing exemptions to the RPO on a project-by-project basis severely compromises the effectiveness of this enforcement tool, and brings into question the reliability of this tool to help build the NC-MSCP Preserve. We recommend that the Project be revised to avoid impacts, except those caused by uses permitted under Sec. 86.604 of the RPO, to all RPO wetlands and wetland-buffer both on- and off-site to provide consistency with the existing RPO.

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4. The Project is also requesting an exemption to the RPO to allow development on Steep Slope Lands. Section 86.602(p) of the RPO defines "Steep Slope Lands" as "all lands having a slope with natural gradient of 25% or greater and a minimum rise of 50 feet, unless said land has been substantially disturbed by previous grading." The development footprint of the proposed Project includes 148 acres of Steep Slope Lands. RPO Section 86.604.e.1.cc allows encroachment into Steep Slope Lands "to avoid impacts to significant environmental resources that cannot be avoided by other means, provided no less environmentally damaging alternative exists." As discussed above, the enforceability of the RPO is critical to the success of the NC-MSCP. The DEIR analyzes several less environmentally damaging alternatives to the proposed Project, and does not demonstrate that the encroachment is being undertaken to avoid environmental resources. Therefore, we recommend that the Project be modified to remove Steep Slope Lands from the development footprint in order to provide consistency with the RPO.

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5. The draft NC-MSCP has identified a target level of conservation for lands within the PAMA at 75 percent; however, the project, as proposed, would achieve about 61 percent conservation of the property. 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. Because anything less than 75 percent conservation on projects occurring in PAMA will require additional cost to the County to make up for the shortfall, we especially advocate for that level of conservation prior to the completion of the NC-MSCP permit. This level of conservation is therefore our starting point as we review each proposed project that is located within the PAMA boundaries. 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.

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As discussed in the Wildlife Agencies' NOP response letters for the proposed Project, the balance of any portion of the 75 percent conservation that cannot be achieved on site should be met by contributing land that adds value to the Merriam Mountains connection, preferably in this same NC-MSCP planning unit. In order to fulfill the proposed Project's mitigation requirements and provide the remaining balance of 75 percent conservation, the Project applicant has purchased a 211.8-acre property located within PAMA of the draft NC-MSCP, specifically within the far eastern section of the Ramona Planning Unit. We recognize the conservation value of this property as it provides a block of habitat situated near segments of the Cleveland National Forest and San Diego County Parks land, supports high value habitat and sensitive species such as Engelmann oak, and aides in the build-out of the NC-MSCP Preserve. However, this property does not provide comparable habitat to that which would be impacted by the proposed Project, and, importantly, does not offset the loss/reduction of connectivity created by the Newland Sierra project or further the conservation efforts in the Merriam Mountains vicinity pursuant to NC-MSCP. Furthermore, the coastal sage scrub on the proposed mitigation property does not support gnatcatchers and its relatively high elevation is not expected to support gnatcatcher movement, and certainly does not contribute to species or habitat resiliency/functionality in the Merriam Mountains planning unit or along the I-15 corridor.

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6. The Department does not believe that the DEIR adequately addresses potential impacts to wildlife from roads and traffic both within the Project as well as off site from the

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widening of Deer Springs Road and the potential changes to the Deer Springs interchange at Interstate 15. We recommend that wildlife crossing structures as well as associated fencing to reduce mortality and facilitate wildlife movement east-west across I-15 be included as mitigation measures for the project to ensure that the site is permeable to wildlife and to minimize impacts from the roads and traffic. Furthermore, we recommend that roads within the Project also be designed with adequate crossing structures and associated fencing to reduce the potential for wildlife mortality and allow for wildlife movement within the Project boundaries.

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7. The Department does not believe that the DEIR adequately addresses the indirect edge effects from development, roads, and agricultural practices on the conserved open space. For example, Argentine ants would be expected to intrude hundreds of feet from the irrigated urban edge, and this typically leads to the loss of native species such as harvester ants, which is the primary prey of the San Diego horned lizard. This is just one example of why habitat fragmentation caused by additional neighborhoods within the Project (development polygons) reduces habitat quality and suitability for some wildlife species.

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8. The Project applicant has committed to conserving the biological resources within the on- and off-site open space in perpetuity by recording a Biological Open Space Easement (M-BIO-8B). Open space easements generally prohibit a number of potentially harmful impacts, such as grading, clearing vegetation, and building structures, from occurring within the open space. However, the proposed easement, as described in M-BIO-8B of the DEIR, includes an exception for selective clearing of vegetation by hand to the extent required by written order of the fire authorities, pursuant to the February 26, 1997 Memorandum of Understanding (MOU) between the Wildlife Agencies and the fire districts. This MOU only addresses clearing to reduce fire hazards for structures that existed at the time the MOU was signed; it was not intended to extend to future development and therefore is not applicable to the proposed Project. New developments should be conditioned to include all fuel management zones within the development footprint. Any future fuel modifications that occur within designated open space would be considered impacts and would require additional compensatory mitigation. We recommend the removal of this exception from the proposed open space easement and the reconfiguration of the open space, if necessary, to reduce the potential need for such clearing to occur. Alternatively, if the applicant does not wish to modify the easement language, the Resource Management Plans (RMPs) for the designated open space should include assurances that compensatory mitigation will be provided for any future impacts that occur because of this exception.

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9. The text of the DEIR references several versions of the draft NC-MSCP, including the 2009, 2014, and 2016 versions; however, only the 2009 version is included in the Chapter 5 List of References. We recognize that significant aspects of the draft NC-MSCP, including biological goals and objectives and covered species lists, have changed numerous times throughout the NC-MSCP's development, thus complicating the evaluation of the proposed Project's impact on the plan. Nonetheless, the DEIR should include citations for all documents referenced in the document. The environmental findings that are included in the draft Habitat Loss Permit state that they are based "upon all of the documents contained in the record for this project" not only the 2009 draft.

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The findings include a discussion of the project's consistency with the *Interim Project Preserve Design Principles*. The first couple of principles state that the on-site open space should provide a long-term biological benefit and that no isolated pockets of open space should be used for mitigation credit. As described above under comments 1 and 2, preservation of a core block of habitat in this unit of the PAMA is critical to the success of the NC-MSCP. We remain concerned about the long-term viability of the proposed open space in the southern and eastern blocks of biological open space due to indirect effects from the adjacent development, fuel modification, and access roads as described in the preferred development alternative. As discussed above, the draft NC-MSCP remains in development and the Department has not agreed to the hardline status of the Newland Sierra Project. Therefore, the conclusion that "By identifying the proposed on-site biological open space as a proposed hardline area, the County has determined that the proposed biological open space would provide long-term biological benefit" is premature.

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10. 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 Biological Resources Technical Report (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.

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11. According to the BTR, western spadefoot toad (*Spea hammondi*, spadefoot) has been detected on site on two occasions, both within the old quarry and outside of the development footprint. There are no expected impacts within the quarry area; however, 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. In the event that additional spadefoot breeding pools are found within 500 feet of the development footprint, the Project applicant should consult with us to discuss possible relocation, forced dispersal, or alternative avoidance measures. Surveys are also necessary in order to fully address adaptive management for this species in the Preserve.

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12. The proposed biological mitigation measures require the development of several associated documents, including RMPs, a Relocation Plan for Ramona horkelia (*Horkelia truncata*), a Revegetation Plan for the restoration of temporarily impacted areas, and a Nesting Bird Management, Monitoring, and Reporting Plan. Opportunity for the Department to review and comment on these documents prior to their approval is currently limited to the Nesting Bird Management, Monitoring, and Reporting Plan. We request the opportunity to review and provide comments to the County on all above-mentioned documents, as well as the proposed final language for both the biological

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open space easements and limited-building-zone easements, prior to their approval by the County.

13. M-BIO-1 describes the biological monitoring that will occur on site prior to and during construction activities to ensure adherence to all proposed avoidance, minimization, and mitigation measures. M-BIO-3 states that a final Monitoring Report documenting the monitoring actions will be submitted to the County upon completion of grading activities for each Final Map and prior to final inspection of the rough grading plan. Given the scale of the proposed Project, we request that the Project Biologist, in addition to preparing the proposed comprehensive final report, make monthly updates available to the County and the Wildlife Agencies.

14. The proposed San Marcos Highlands project, which is located to the southwest of the proposed Project and within the 5-mile radius, appears to have been excluded from the cumulative impact analysis. Given the proximity to the proposed Project and the potential wildlife movement and connectivity issues associated with the San Marcos Highlands project, we request that it be included in an updated cumulative impact analysis.

We appreciate the opportunity to provide comments on the subject project and look forward to further coordination with the County on this project. If you have questions regarding this letter, please contact Carol Williams of the Department at Carol.Williams@wildlife.ca.gov or (858) 637-5511.

Sincerely,



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ec: State Clearinghouse
Doreen Stadlander, USFWS

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