



May 14, 2020

Ms. Chelsea Oakes
San Diego County
Department of Planning and Development Services
5510 Overland Ave, 3rd Floor
San Diego, CA 92123

RE: North County MSCP Status Review and Options Assessment

Dear Ms. Oakes,

Thank you for the opportunity to comment on the North County MSCP status review and options assessment.

San Diego County's regional focus on habitat protection has resulted in the creation of a still-expanding, extraordinary, habitat preserve system—albeit with some shortcomings, such as uncompleted subarea plans, weak regional management, and inconsistent oversight across planning areas. Even so, the preserve system is a tremendous accomplishment that will have lasting impacts for generations. The complementary creation of the San Diego Management and Monitoring Program (SDMMP), to help provide technical assistance and coordination of regional conservation efforts, has strengthened our understanding of the County's unique ecosystems, and improved the chances that the preserve system will be successful in the long-term. San Diego County should be proud of the role it has played in developing and implementing NCCPs across the region, and The Escondido Creek Conservancy is especially appreciative that the County has invested significant financial resources over the past decade in this endeavor.

Support for Option 5, Complete the North County MSCP (HCP/NCCP)

The Escondido Creek Conservancy (Conservancy) strongly supports the completion of the North County MSCP—Option 5. Finishing the plan will continue the advancement of regional conservation in an adaptive-based conservation framework. We appreciate the work completed to date and included in the 2017 draft plan and look forward to an opportunity to improve the draft before final adoption.

Building Resiliency into the Preserve System

The North County MSCP is especially important to the Conservancy as the planning area overlaps with the Escondido Creek watershed, the Conservancy's primary area of work. Because of the uncertainty of climate change and how the PAMA is defined in the draft North County Plan, the Conservancy is concerned the PAMA, as currently defined, will not lead to long-term protection of habitat corridors and linkages, *within* the North County MSCP planning area, and *between* NCCP planning areas. We offer the following suggestions to address these concerns:

- ✓ **Climate Adaptation:** San Diego State University (SDSU) and the Climate Science Alliance have developed recommendations (attached) to provide technical support to strengthen connectivity and climate adaptation in the North County plan, such that the plan is based on the best available science on functional landscape connectivity, climate vulnerabilities, and climate

adaptation strategies, such as carbon farming. We urge the County to contract with SDSU and the Climate Science Alliance as part of the North County MSCP plan completion and include their recommendations in the final plan. Both organizations have unique expertise that will help strengthen the final North County MSCP and improve its chances of long-term success.

- ✓ **Engelmann Oak:** We reject the recommendation to remove the Engelmann oak as a covered species in the plan and believe it should be maintained. Engelmann oak woodland is an important and infrequent habitat in North County San Diego, with limited distribution in Southern and Baja California. As a California Native Plant Society 4.2 taxon, and a non-listed state or federal species, conservation on the species level is essentially unenforced. Thus, the Conservancy suggests that the Engelmann oak be retained as a North County MSCP-covered species to warrant preservation on a habitat level, as an important ecotone and integrative landscape element.
- ✓ **Farm/Ranch Land Buffers, and Consistency with Farmland Conservation Planning:**
 - Many of the corridors in the PAMA are narrow because many habitat areas in North County are bifurcated by other uses. These narrow connections limit the chances that wildlife corridors will be successful long-term, thus undermining the purpose of the MSCP. Fortunately, farming and ranching can be compatible with wildlife conservation, and could become an important tool in the North County plan. We recommend that farms and ranches, and other suitable areas adjacent to the PAMA, be evaluated as conservation buffers, and these buffer areas be given a designation reflective of their role in supporting the plan. This designation would help farmers and ranchers access conservation funds, which they could use to buy down the cost to continue agricultural operations, or to help sell their land-for conservation (if they choose). Currently, agricultural lands compete poorly for habitat grant funds.
 - The Greater San Diego RCD is currently developing a grant proposal to the California Department of Conservation that, if awarded, will lead to the development of the first comprehensive San Diego County Farmland Conservation Plan. Planning for the completion of the North County MSCP and this RCD-led farmland conservation plan should be coordinated at the highest levels so the plans will align and be mutually successful.

Governance

One of the most striking missed opportunities in existing NCCPs and otherwise “protected” public lands, such as storm drains and flood control channels, is that many preserved areas are inadequately maintained, especially concerning the control of invasive species. Hundreds, if not thousands, of acres of wildlife habitat are lost every season, not from bulldozers, but from lack of care and attention to the fundamentals of habitat management. Our concerns go beyond biological monitoring, which has improved with the assistance of the SDMMP program, to the day-to-day care and attention that should be applied to all preserves so we can say sincerely, and with a straight face, that MSCP land is well-

managed and will thrive in perpetuity. Regrettably, this lack of attention has also increased the risk of fire throughout the region, as invasive, non-native plants are often more flammable than native plants.

Fundamentally, the problem is one of governance, responsibility, and follow-through; when no one entity can be held accountable, the land suffers. We believe much of the tension around the MSCP is related to lack of clarity on this point. For example, who is responsible to make sure wildlife corridors that cross public and private lands, across multiple jurisdictions, are maintained to support wildlife? Calls or e-mails to planning departments or code enforcement officers often go unreturned, as accountability is poor or nonexistent.

Completing the North County plan provides an opportunity to reconfigure the governance structure of the MSCP in San Diego County to enhance accountability. Good arguments have been posited by The Endangered Habitats League, and others, for a single-purpose MSCP agency like in Riverside County. If that is not possible, we suggest, instead, that a new agency be created within San Diego County government, with staff dedicated to no other purpose than to ensure the success of habitat plans across the region. Better yet, those same staff would also be given authority over storm drains and flood conveyance so those working lands, often supporting potential quality habitat, can be brought into the MSCP preserve system. This would not require new money, as existing staff could be re-assigned.

We appreciate your consideration.

Sincerely,

DocuSigned by:

Ann Van Leer

5/14/2020

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Ann Van Leer

Executive Director

ann@landconserve.com

858-442-0937

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Enclosure: *Recommendations for Connectivity and Climate Adaptation Technical Support*

North County Multiple Species Conservation Plan

Recommendations for Connectivity and Climate Adaptation Technical Support

San Diego State University and Climate Science Alliance

Overview

The proposed North County Multiple Species Conservation Plan (NC MSCP) is intended to provide environmental and economic benefit to north-coastal San Diego County by establishing a landscape scale plan to protect important natural communities, habitats, and species. A key tenet in the development of such a plan is the use of best available science, as stated in the NCCP Act and HCP Handbook. As the County is currently considering options to revise and proceed with the NC MSCP, it is important that any updates to the plan include not only best available science on covered species' habitats for the identification of core preserve areas, but also on connectivity and climate adaptation considerations that should be integrated into the plan.

As described in the recent ICF report to the County on the status and options for proceeding with the North County Plan [bold emphasis added]:

*“Under the MSCP, large blocks of **interconnected** habitat are conserved through acquisition of land by private and public entities and used as mitigation for development. In return, the County receives long-term permits from the USFWS under the Endangered Species Act (ESA) and from the CDFW under the NCCP Act. These permits include regulatory assurances from the Wildlife Agencies that **the terms of the conservation plan would not change in response to unforeseen changes in the environment or the status of the species covered by the plan.**”*

To ensure that the habitat proposed for conservation under the plan is truly interconnected and that potential impacts of changes in the environment over time are minimized to the extent practicable in the plan design, an updated review and integration of connectivity and climate adaptation science are critical for plan revision.

Although the most recent 2017 draft of the NC MSCP did include a discussion of landscape connectivity considerations and climate change impacts, it does not appear that a spatially explicit linkage plan for functional connectivity was incorporated into the preserve design or that climate adaptation actions were considered and integrated into the plan.

Goal

Utilize and further develop the best available science on functional landscape connectivity, climate vulnerabilities, and climate adaptation strategies in the review and revision of the North County MSCP.

Objectives

- 1) Develop a spatially explicit landscape linkage plan that addresses functional connectivity, (i.e., incorporating species' biological and behavioral responses to the landscape) rather

than relying strictly on structural connectivity (i.e., focused only on the physical structure of the landscape)

- 2) Identify opportunities to support and enhance connectivity in the plan area through preserve design
- 3) Assess the vulnerability of the preserve network and covered species to the impacts of increased climate variability climate change
- 4) Identify opportunities to mitigate current and potential future impacts of increased climate variability and climate change through the integration of climate adaptation strategies into the North County MSCP

Recommendations

Connectivity

- Execute fine-scale connectivity modeling for a suite of focal species
 - Leverage existing landscape models developed at the county-extent for [SDSU's SR-67 Connectivity project](#) funded by SANDAG. These would serve as the input surfaces for connectivity models. Previously modeled species include puma, mule deer, bobcat, wrenit, California mouse, and big-eared woodrat.
- Use results of multi-species connectivity models to recommend a linkage strategy within the NC MSCP footprint
 - Review overlap of important linkage areas with areas proposed for conservation
 - Identify barriers to wildlife movement within the NC MSCP to determine where wildlife crossing structures would improve preserve functioning and species persistence
 - Review overlap of important linkage areas with agricultural lands to determine where [management strategies on working lands](#) could complement conservation efforts under the NC MSCP

Climate Adaptation

- Compare and contrast results of fine-scale connectivity modeling with regional [Climate Resilient Connectivity](#) modeling to determine where linkages may need to be prioritized to support climate adaptation
- Review data from [San Diego County Ecosystems Report](#) on the impacts of climate change in San Diego and available information from the [Connecting Wildlands and Communities](#) project to identify specific climate impact vulnerabilities and within the proposed NC MSCP.
- Identify and recommend climate adaptation strategies to incorporate into the NC MSCP that can help mitigate the impacts of climate change on the preserve network.