



Chelsea Oakes, Manager  
Land Use and Environmental Planning  
County of San Diego  
Via [mscp@sdcounty.ca.gov](mailto:mscp@sdcounty.ca.gov)

May 13, 2020

RE: Comments on ICF Report: Options for North County Multiple Species Conservation Plan

Dear Ms. Oakes:

Thank you for this opportunity to provide input regarding ICF's report on options for the North County Multiple Species Conservation Plan (NC Plan). We are writing on behalf of the Conservation Committee of the Sierra Club, San Diego Chapter, and our North County MSCP Task Force.

The San Diego Chapter of the Sierra Club has been involved in the development of the NC Plan since its inception, and we have supported the County's efforts to complete the NC Plan. We are pleased that the County has retained ICF to provide options and guidance for moving forward with the NC Plan. We have reviewed the ICF report and participated in the virtual meeting on April 30 with ICF and County staff.

We are writing to you in lieu of completing the Stakeholder Survey because the Sierra Club – San Diego Chapter supports only one option for the completion of the Plan, which is Option #5, "Revised North County Plan." According to the ICF report, this option is clearly superior to the others as it results in a NC Plan that optimizes the protection of wildlife and habitat in North San Diego County. Option #5 also provides benefits to the County and developers, such as reduced costs of processing projects and regulatory assurances.

Chapter 3 of the ICF report, "Evaluation of the Current Plan and Recommendations," discusses a number of issues that need to be addressed if the County decides to complete the NC Plan as an HCP/NCCP. We would like to point out the following:

1. In-lieu Fee Program

An in-lieu fee program could be included in the NC Plan if there are firm conditions that the in-lieu fees will be used for acquisition of properties only in the North County Planning Area and that there are limitations on its use. For example, there should be time constraints for the use of the funds; acquisitions must be restricted to the NC Planning Area; and acquisitions must provide equivalent

environmental assets. Land acquisitions must be commensurate with impacts: habitat mitigation must be in rough proportion to habitat and species impacts and consistent with mitigation ratios.

If the County relies on mitigation banks, only those in the North County Planning Area should be used. To accomplish this, the County should encourage the establishment of North County Planning Area mitigation banks.

## 2. Changes to the Covered Species List

### a. Golden Eagle

The golden eagle should be included in the NC Plan because it has landscape-scale conservation implications, and it has been dramatically declining in San Diego County and Southern California. We recommend that Warner Springs Ranch be included in the NC Plan to improve the conditions for the golden eagle to be included as a covered species in the NC Plan.

### b. Engelmann Oak

We believe that the Engelmann Oak should be included in the NC Plan as it is a keystone species that supports numerous other species.

## 3. Trails and Recreation in Sensitive Habitat Areas

Sensitive species thrive best in fully protected areas. Trails and recreational activities for the public are often incompatible with the goals of HCPs/NCCPs and should be minimized to the fullest possible extent in the NC Plan. Acquisition and management of open space lands for trails and other outdoor recreation should be prioritized separately from the NC MSCP.

## 4. Rancho Guejito

Rancho Guejito should be included in the NC Plan. It could be included as a "Major Amendment Area," an unplanned/unpermitted portion of the North County Preserve area, subject to future negotiations.

## 5. Stakeholder Advisory Group

We recommend that the County retain/establish a Stakeholder Advisory Group and include it in the Plan development process at key intervals.

## 6. Regional Funding Source

Funding is key to the success of the Plan. The regional funding source envisioned in the 1998 MSCP Regional Plan has never been established. Funding mechanisms for the costs to acquire and manage the Preserve in perpetuity must be established as an integral part of the NC Plan.

## 7. Defensible Space

The Plan must ensure that all vegetation management for wildfire safety and defensible space occurs within project footprints and does not extend into the Preserve.

## 8. Alternatives to the PAMA Approach to the Assembly of the Preserve

The ICF report suggests that the PAMA approach is not the optimal way to assemble the Preserve. We are unclear as to what approaches to Preserve assembly would be effective substitutes. We request further information on this issue.

## 9. Organization of County Staff for Implementation of the Plan

We support an assigned staff and a separate and dedicated team for implementation. We do not think this program is best located within the Parks and Recreation Department, due to the competing objectives of a Preserve system for wildlife conservation and the Department's mission to provide recreation for the public.

We hope our comments on the ICF report on NC Plan options will be helpful. We reiterate that we fully support Option #5, the full HCP/NCCP, with possible revisions.

Please feel free to contact us if you have any questions or concerns.

Sincerely,

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