

Wildlife and Habitat Conservation Coalition

Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.

June 1, 2020

Chairman Steve Vaus and SANDAG Board of Directors
SANDAG
Via Email



RE: Wildlife Habitat Conservation Coalition SUPPORT for management of Rancho Lilac by the San Diego Habitat Conservancy

Dear Chair and Members of the Board,

The undersigned members of the Wildlife Habitat Conservation Coalition (WHCC) request that SANDAG proceed to execute the final contract with the San Diego Habitat Conservancy (SDHC) to manage the Rancho Lilac mitigation site.

This site has many considerations and a long history of negotiations between SANDAG, wildlife agencies, and CalTrans that may not be immediately apparent to the SANDAG Board. The site was purchased as part of the conservation package that expedited permits for improvements of SR-76, primarily for protection of significant, sensitive species and habitat resources on this site. In addition, the site contains archeological sites and 27 historic buildings, and is listed as a historical landscape. Finally, the contractor will be responsible for tenant management and removal of hazardous materials.

The following partial list of requirements in the RFP reveals the complexities of this site.

- *Experience in historic preservation and cultural resource management (both prehistoric and historic cultural resources).*
- *Experience in the development of resource management plans for the adaptive management of biological and cultural resources.*
- *Understanding of the potential for income generating activities to supplement endowment monies such as grant fund raising.*
- *As appropriate to the site, ranching and farming knowledge and experience as it applies to mitigation sites such as invasive plant control through prescribed grazing or burns, controlling water flow regimes, cattle ranching, harvesting, animal pest invasions and ownership of equipment.*
- *Knowledge of techniques to efficiently control vandalism, dumping, arson, domesticated pets, and invasive species.*

All of these requirements were fully and appropriately addressed in the SDHC's responses to the RFP and there are no valid reasons why SANDAG should not execute the contract to ensure that the required Habitat Management Plan (HMP) is prepared and implemented in a timely manner.

We would like to highlight the following important points.

1. Under the provisions of the *TransNet* Extension Ordinance, the SR 76 projects were one of three transportation improvements under the RTP that was to provide a "environmental net benefit" to species and habitat.
2. The County declined their first-right-of-acceptance so the project went to an RFP process. To pull the plug now on the highest-scoring, fully qualified respondent would be an unfair process and would dissuade other qualified entities from responding to RFPs in the future. A process that was outlined, agreed to, known to all, and should be respected.
3. As is the case with all mitigation or 'environmental net benefit' lands, their management must be resources driven. This is critical to achieve the protection and enhancement of habitat that is required through the regulatory system for mitigation of impacts. Once SDHC secures the contract, it will prepare the HMP based on science and resources on the ground, which is as it should be.
4. There are significant sensitive resources on this site, including endangered and other sensitive species and other resources noted above.
5. While the RFP does not specifically mention trails, recreation, or any public access, trails are not precluded. The HMP should discuss these. It may be that certain kinds of trails and/or recreational uses should not be allowed in certain areas of the site, but could be allowed in others without negatively affecting the biological and other resources. The HMP should provide analyses that help decide this. As was stated in the hearing, the HMP is the appropriate time to address this issue.
6. The community outreach element of the HMP intended for direct outreach to neighbors surrounding the site and to the broader community of Valley Center is the appropriate means for coordinating with surrounding land owners and recreationists on trail planning, if any, involving Rancho Lilac.
7. While it may seem counter-intuitive, even 'non-consumptive' recreational uses (e.g., hiking, biking, horseback riding) can negatively affect wildlife and habitat and, in some cases, the effects can be severe. The current special issue of the *California Fish and Wildlife Journal* (<https://wildlife.ca.gov/Publications/Journal/Contents>) addresses some of these effects and solutions to them. However, recreation must be well

planned and perpetually managed. We request that, in the event that recreation and/or additional trails are allowed within habitat or sensitive areas or their zones of influence, the Dept of Fish and Wildlife and US Fish and Wildlife Service be asked not only to review the HMP (per page 31 of the RFP) but also to approve any trail and recreational plans that may affect sensitive resources. Perhaps the requirement of a Resource Management Plan could be negotiated to be added or as part of the HMP to address concerns of the trail users. But, the most important issue is that all decisions about uses and management be based on the protection of the resources.

In conclusion, not acting to approve this contract undermines SANDAG's RFP/RFQ processes. If there were no competent responders to the RFP for Rancho Lilac in 2016, then SANDAG should have recirculated another RFP soon after that decision was made - at which time the County could have submitted its proposal. However, SANDAG has negotiated an agreement with its highest-scoring, qualified land manager over an extended period.

Again, we strongly urge the Board to support and endorse the need for science and resource driven actions when it comes to habitat and we believe the SDHC is the best and only justifiable choice in this case.

Thank you for your consideration of our comments.

Sincerely,

Pamela Heatherington, Environmental Center of San Diego
Dan Silver, Endangered Habitats League
Frank Landis, California Native Plant Society
Suzi Sandore, Sierra Club North County Group
George Courser, Sierra Club San Diego Chapter
Cody Pettersen, San Diego Democrats for Environmental Action
Bill Tippets, Southwest Wetlands Interpretive Association
Laura Hunter, Escondido Neighbors United
Diane Nygaard, Preserve Calavera
Joan Herskowitz, Buena Vista Audubon Society
Dave Hogan, The Chaparral Lands Conservancy
Michael Beck, Endangered Habitats Conservancy

Cc

Hasan Ikhata, Executive Director

Kim Smith, Senior Environmental Planner