

A-1 United States Department of the Interior Fish and Wildlife Service

A-1-1 The comment identifies the documents the United States Fish and Wildlife Service (USFWS) reviewed when preparing the comments that follow. The comment describes the USFWS and its responsibilities under the federal Endangered Species Act, and then summarizes the proposed Project.

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

A-1-2 The comment states the USFWS “recommend[s] the findings and conclusions be revised to focus on the project’s consistency with the Interim Project Preserve Design Principles because the Wildlife Agencies have not conducted our review of the plan and associated conservation analysis of the draft NC-MSCP.” The County does not concur with this comment.

The Planning Agreement (County of San Diego 2008 and 2014) for the North County Multiple Species Conservation Program (NC-MSCP) includes design principles for “Interim Projects” (i.e., projects submitted for approval while the NC-MSCP is in draft form) such as Newland Sierra. The County has determined that the Newland Sierra project is consistent with these principles and that the application of the Habitat Loss Permit (HLP) criteria meets the preserve design principle. The analysis of the proposed project in the context of these principles is provided in Section 2.4.12.5 of the EIR and within the Section 4(d) Habitat Loss Permit findings included as Appendix E to the BTR (Appendix H of the EIR). Therefore, the HLP does focus on the Interim Project Preserve Design Principles as the comment requests. In addition, the draft NC-MSCP identifies conservation goals for the adjacent PAMA planning units, and the Newland Sierra project has been designed to be consistent with these goals. These principles are outlined in Section 2.4.1.2.5 of the DEIR, pgs. 2.4-82 through 2.4-87. The County agrees with the designation of three large blocks of interconnected on-site open space to provide long-term biological benefit to coastal sage scrub and associated plant and wildlife species. Therefore, the County concludes the HLP meets the preserve design principles. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

A-1-3 The comment recommends “consideration of a scaled-back alternative that would minimize project impacts to the proposed PAMA for the NC-MSCP and maintain wildlife connectivity and a large, core habitat area.”

Comment Letter Responses

The County acknowledges the comment and directs the commenter to Chapter 4, specifically Sections 4.10, 4.11 and 4.12, which discusses alternatives recommended by the Wildlife Agencies during the NOP comment period. These alternatives “minimize project impacts to the proposed PAMA ... and maintain wildlife connectivity and a large, core habitat area.” No further response is required as the comment addresses general subject areas (alternatives), which received extensive analysis in the Draft EIR, specifically Chapter 4.0. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- A-1-4** The comment states the USFWS “recommend[s] that the project consider including wildlife crossing structures as well as associated fencing to reduce mortality effects of the roadways and maintain connectivity within the project site as well as this portion of the PAMA.” The County does not concur with this comment.

The Draft EIR determined that impacts to wildlife due to vehicle collisions would be less than significant. Thus, there is no requirement for mitigation measures such as fencing and wildlife crossing structures. The Draft EIR, however, does include mitigation measure M-BIO-8E (Biological Open Space Fencing and Signage), which is intended to prevent disturbance of the open space by unauthorized human activities (p. 2.4-118 and 2.4-119). The fencing required under this mitigation measure may also serve to reduce wildlife movement into roadways. This mitigation measure is part of the overall protection and management of the on-Site open space specified in mitigation measures M-BIO-8A through M-BIO-8E. The County has also determined that habitat connectivity within the project Site and this portion of the PAMA can be adequately maintained without additional fencing or wildlife crossing structures.

- A-1-5** The comment states the off-site mitigation area for impacts to gnatcatcher and coastal sage scrub is “located on the eastern edge of the planning area where gnatcatchers are not expected to be found,” and recommends “that impacts to the gnatcatcher be addressed through conservation of occupied coastal sage scrub as close to the affected area as feasible and preferably within the affected planning unit.”

The 212 acres of off-site mitigation habitat in Ramona is not intended to serve as mitigation for impacts to coastal California gnatcatcher; rather, the off-site mitigation land serves to provide like-kind mitigation for vegetation impacts. Impacts to coastal California gnatcatcher are mitigated through implementation of M-BIO-8A through M-BIO-8E.

Comment Letter Responses

- A-1-6** The comment “requests the opportunity to review and provide comments on the Resource Management Plan, [and] the proposed final language for both the biological open space easements and limited-building-zone easements, prior to approval by County officials.” The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- A-1-7** The comment provides contact information for further coordination. The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.

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