



May 31, 2024

Stephanie Neal
Dept of Planning and Development Services
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RE: North County MSCP: Technical Components of the Conservation Strategy

Dear Ms. Neal:

Endangered Habitats League (EHL) appreciates the opportunity to provide comments. EHL serves on the Advisory Committee for the program, and is dedicated to its success.

The following are questions and comments from reviewer Jerre Ann Stallcup, formerly with Conservation Biology Institute.

- Why are there no maps of species, habitats, important corridors, and existing and proposed conserved areas in the plan? Will maps be included in future revisions of the plan?
- Which areas do the acreages in the text represent? That is, how were the acreages calculated? What areas are assumed to be conserved? Developed? Relative to habitats, species, connectivity, etc.?
- What specific assumptions have been made relative to conservation? Relative to edge effects or indirect impacts caused by recreation? For example, the South County Plan goes into more detail about the levels of protection and assumed impacts. The North County plan will be much more impacted by edge effects and other indirect effects because there are few large blocks of habitat that will be conserved. It is difficult to judge whether species can be covered without reviewing where the impacts will occur and the Framework Resource Management Plan, which is not yet available.
- Which species populations will be conserved? Which may be lost to development or indirect impacts? The SDMMP Management Strategic Plan* notes that some populations are more important than others, based on size, connectivity, genetics, etc. Which populations are critical to continued persistence of the species in the County? Within the species range? How dependent are the MSCP and Orange County plans on these populations in North County, and vice-versa? That is, what is the relative contribution of the North County plan to conservation in San Diego County? in the region? Will this information be included in the future appendices of individual species profiles?

- For example, North County is important to the *regional* conservation of grasslands and oak woodlands (particularly Engelmann oaks) in San Diego County, and these communities and their species should be given special attention in the Plan. The text mentions *either* mitigating impacts to Engelmann oaks or acquiring additional protection. Shouldn't we understand how much will be newly protected?
- What and where are the data gaps and biological information for species proposed to be covered? What specific actions are needed to fill these gaps? These data gaps should be described in the species profiles.
- How will the plan's Management and Monitoring strategy compare to what SDMMMP has been doing for the past 10 years and proposes to do in the future? Why are none of the SDMMMP data and publications referenced in the plan when the document states that this information has been reviewed?
- How does the species modeled habitat referenced in the plan compare to that which SDMMMP has done? Where is the potential/modeled habitat that may be conserved relative to Known Occupied Habitat? developed? How much? Are there specific areas of this modeled habitat that should be surveyed for specific species (this is mentioned in the text but difficult to determine how much of and where the modeled habitat will be surveyed)?
- For example, the text suggests conserving or “creating” new occurrences of Del Mar manzanita and Encinitas baccharis supporting at least 35 individuals? What is the basis for this size population and is the location important, especially if it is isolated and subject to wildfire?
- How does the County's Narrow Endemic Plan policy figure into conservation assumptions for species not proposed for coverage? It is mentioned in the text but not clear where and how it will be applied.
- How will climate change affect the habitats and species proposed for coverage?
- Will the County continue to participate in the SDMMMP monitoring and management for North County? How will the County address management and monitoring costs and staffing?
- How does the proposed plan compare with the Science Advisors' recommendations in 2004/5?

* SDMMMP Management Strategic Plan: [Management Strategic Plan \(sdmmp.com\)](http://sdmmp.com)

Species-specific questions:

- Mojave tarplant and spreading navarretia are not known from the Permit Area, but only in the Plan Area, and it is unclear whether potential habitat occurs in the Permit Area. The Plan Area includes “lands not subject to the County's land use authority and the Plan.” How will take be allowed in the Permit Area, based on occurrences in the Plan Area, where the County doesn't have land use authority?
- Cactus wrens and gnatcatchers—defer to regional SDMMMP analyses to determine if and where coverage is warranted.

- Tricolored blackbirds, shrikes, grasshopper sparrows, Bell's sage sparrows, yellow-billed cuckoos—do these occur in North County in any numbers sufficient to say there are populations, and that there can be take?
- Species that require translocation (burrowing owl). Will take be allowed?
- Species that require reintroduction (SW pond turtle). Will take be allowed?

The following comment is provided by reviewer Robb Hamilton of Hamilton Biological on Landscape Objective 3.3, fire management.

- To aid recovery of the Coastal Cactus Wren, and to mitigate the creation of large swaths of mustard and other weeds in fuel modification clearing zones, recommend implementing large-scale plantings of cactus in fuel-modification zones, particularly when located near extant cactus wren populations.

Other comments (from EHL) are as follows:

- In Z.3 and Z.4, Community and Species Goals, Objectives, and Actions, no rationales are given for the acres targets for communities or species. Presumably, a separate conservation analysis will discuss these issues in terms of populations, numbers of nests, etc.
- EHL is concerned over the adequacy of existing County documents, such as to provide “guidelines and criteria for Preserve Managers to follow in the design and implementation of a public access plan that is consistent with the biological goals and objectives of the North County Plan.” (Section 5.7.9, Recreation and Public Access Conservation Standard) Rather, the NC MSCP should take a fresh look, availing itself of recent research and studies, and modify existing documents or create plan-specific guidance documents.
- We again reiterate the unacceptability of the current clearing exemption for single family homes, which is almost *four football fields*, far beyond any legitimate need for defensible space, out-buildings, stables, etc. (E.g., 5.7.1, on rare and endemic plants, “If a project falls within the specific requirements for the exemptions in the BMO (e.g. single-family home exemptions) the County would apply the exemption and no surveys or mitigation are required.” The result of applying the current exemption could be significant and unmitigated impacts.
- In 5.7.5, Bald and Golden Eagle Conservation Standard, it is implied that simply because similar activities are already occurring, deviations from buffer standards may be allowed for additional activities. (“whether similar activities or disturbances are already occurring within the eagle nest buffer.”) Rather, additional activities beyond baseline will have *cumulative impacts* on top of the baseline, and may well put the level of harm over the tipping point of nest abandonment. The baseline activities should also be considered for elimination.

- In 5.7.7, Wildlife Linkage and Corridor Standards, there are no metrics provided for corridor and linkage widths, for example, for large mammals. (The metrics provided are for roadway crossings.)

Thank you for considering these comments and please let me know of questions.

Yours truly,



Dan Silver
Executive Director