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In Reply Refer to:
FWS/CDFW- 2022-0035929-HCP-TA-07

September 22, 2025
Sent Electronically

Sandi Sawa
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City of Santee
10601 Magnolia Avenue
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Subject: Santee Multiple Species Conservation Program (MSCP) Subarea Plan and Draft Environmental Impact Report for the Santee MSCP Subarea Plan (SCH# 2023030471), San Diego County, California

Dear Sandi Sawa:

The U.S. Fish and Wildlife Service (Service) and California Department of Fish and Wildlife (Department), collectively referred to as the "Wildlife Agencies," have reviewed the Draft Environmental Impact Report (DEIR) for the Santee Multiple Species Conservation Program (MSCP) Subarea Plan, dated August 2025. The Wildlife Agencies have been coordinating with the City of Santee (City) and project proponents on development of the Santee MSCP Subarea Plan for many years and provided comments on the Notice of Preparation (NOP) of a DEIR in a joint letter dated April 17, 2023. The comments provided herein are based on prior planning efforts, information provided in the DEIR and the August 2025 Santee MSCP Subarea Plan Public Review Draft (Subarea Plan), and our knowledge of issuance criteria under section 10(a)(1)(B) of the Federal Endangered Species Act (Act or ESA) of 1973, as amended, and the Natural Community Conservation Planning (NCCP) Act (Fish & G. Code § 2800 *et seq.*). Although the NCCP Act was revised in 2002 by Senate Bill 107¹, Natural Community Conservation Plans (NCCPs) such as the Santee Subarea Plan that were under development prior to the 2002 revisions conform to the NCCP Act as it read in 2001 (Fish & G. Code § 2830(b)).

These comments are meant to complement the work completed during previous coordination efforts and to ensure the Subarea Plan and DEIR meet issuance criteria for State and Federal permits pursuant to the NCCP Act and ESA. The comments below are the Wildlife Agencies' major comments, with more specific and additional comments provided in Attachment 1. We are confident the issues raised herein are resolvable through discussion and clarification without requiring changes to the conservation strategy.

¹ Statutes 2002, Chapter 4, Sections 1 and 2, Page 81 (S.B. 107). Minor changes were subsequently enacted as part of S.B. 2052 (Stats. 2002, Ch. 133, §§ 1 and 2, p. 568).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fishes, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Act (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. For purposes of the California Environmental Quality Act (CEQA), the Department is a Trustee Agency with jurisdiction over natural resources affected by the project (Guidelines §15386²) and is a Responsible Agency over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA) and Fish and Game Code Section 1600 *et seq* (Guidelines §15381). Pursuant to the NCCP Act, the Department also oversees the development and implementation of NCCPs and issues NCCP permits.

The City of Santee is located east of the City of San Diego and north of the City of El Cajon in central San Diego County. The City is a participating jurisdiction within the larger San Diego County MSCP Subregional Plan (Subregional Plan), sometimes referred to as the “umbrella plan.” The Subregional Plan is a comprehensive, landscape-level plan to preserve San Diego’s unique, native habitats and wildlife for future generations. It was completed in 1998 and crosses municipal boundaries in a unique, regional conservation effort that streamlines the environmental permitting process for development projects in its jurisdictional area by ensuring compliance with the ESA and NCCP Act. The Subregional Plan is implemented by participating jurisdictions through individual MSCP Subarea Plans. The Santee Subarea Plan must be consistent with and fulfill the goals, requirements, and conservation strategies outlined in the 1998 Subregional Plan.

The proposed permit area for the Subarea Plan (Plan Area) encompasses approximately 10,311.3 acres within the City’s jurisdictional limits and two conservation areas totaling 171.1 acres located outside of the City that provide mitigation for the Fanita Ranch Hardline Project (depicted in Attachment 2). Approximately 398.7 acres within the City are identified as “Not a Part” and are excluded from the Plan Area, including certain lands not under the jurisdiction of the City (e.g., Padre Dam Municipal Water District) and properties that have elected to be excluded from planning efforts. The Subarea Plan provides a framework to protect, enhance, and restore the habitats for 20 identified plant and animal species (Covered Species; see Attachment 3) and serves as the basis for the City to obtain a Federal section 10(a)(1)(B) permit and State NCCP permit for a term of 35 years. The DEIR analyzes the potential impacts of issuing Federal and State incidental take permits for the proposed Covered Species related to adoption and implementation of the Subarea Plan, execution of the Implementing Agreement, and associated General Plan, Zoning, and Land Use Regulation changes. As the Subarea Plan does not authorize or approve individual Covered Activities, the DEIR does not fully evaluate these activities, and they will undergo separate environmental review as required by State law.

One objective of the Subarea Plan is to streamline the environmental permitting process for Covered Activities identified by the Subarea Plan that may result in incidental take of species

² CEQA’s implementing regulations, commonly known as the CEQA Guidelines (Guidelines), are found at California Code of Regulations, title 14, section 15000 *et seq.*

listed pursuant to the ESA and CESA. Proposed Covered Activities include planned development (i.e., the Fanita Ranch Hardline Project), future development activities, operations and maintenance of City infrastructure and facilities, and preserve management and monitoring. The Subarea Plan identifies approximately 2,263 acres of suitable habitat for Covered Species for future conservation to offset approximately 1,125 acres of impacts from Covered Activities. A main component of the Subarea Plan's conservation strategy is the establishment and in-perpetuity management and monitoring of a preserve system (Managed Preserve) that supports viable populations of native plant and animal species and their habitats. Per the DEIR, the Managed Preserve is designed to integrate and connect to existing protected open space within the Plan Area and greater Subregional Plan area to support overall preserve design and connectivity.

We offer the following comments and recommendations to assist the City in finalizing the Subarea Plan and DEIR. As a reminder, the Service may request changes to the Subarea Plan as the Service prepares to publish its Environmental Assessment in the Federal Register for environmental review as required by the National Environmental Policy Act. Similarly, the Department may also request additional changes to the Subarea Plan necessary for issuance of an NCCP Permit. The Department as a Responsible Agency must also make CEQA findings as part of its discretionary decision to authorize take of species whose conservation and management are provided for in the Subarea Plan. Therefore, the Department will rely on the adequacy of the Subarea Plan EIR when analyzing permit decisions pursuant to the NCCP Act (CEQA Guidelines, § 15096). As such, comments below related to the adequacy of the DEIR are specific to the Department.

1. Covered Activities: The description of some Covered Activities, along with the associated avoidance, minimization, and mitigation measures, lack sufficient detail. The Subarea Plan should identify and quantify impacts for all Covered Activities and clearly indicate how impacts to Covered Species and their habitats will be avoided, minimized, and/or mitigated to ensure Covered Species are adequately conserved and managed. Section 5.5 of the Subarea Plan outlines measures to address impacts to habitats, ecological linkages and corridors, wetland protections (including vernal pools), Narrow Endemic species, and species-specific conservation standards. However, the following activities lack sufficient clarity regarding coverage and mitigation to support a less than significant conclusion as outlined in Section 4.2.3 of the DEIR on potential adverse effects to biological resources:
 - a. *San Diego River Subunit Impacts and Mitigation*. The proposed mitigation for impacts within the San Diego River Subunit is unclear and appears insufficient to offset the anticipated impacts. Thus, the DEIR does not provide sufficient information to evaluate that impacts to Threshold BIO#3 (*Impacts to state or federally protected wetlands*; Section 4.2.3.3 of DEIR) are less than significant. The Subarea Plan anticipates 37.6 acres of impacts to habitat (31.6 acres of which is riparian/wetland habitat) within the San Diego River Subunit from City-implemented Covered Activities (e.g., street and drainage projects, new trails, defensible space). The City proposes to offset these impacts through increased in-perpetuity management and monitoring of 145 acres of existing City-owned preserves. These include Mast Park West, Mast Park East (Mission Creek), and the

Walker Preserve. The main concern for the Wildlife Agencies is that these properties were acquired using grant funding, through dedication by project proponents, or in the case of Mast Park West, through dissolution of The Environmental Trust bankruptcy (i.e., this land was already used for mitigation).

To reduce impacts to a level below significant, the EIR and Final Subarea Plan should quantify the impacts from City-implemented Covered Activities by activity type and subunit. This will enable us to meaningfully evaluate and analyze the anticipated impacts and the types and amounts of mitigation proposed to offset those impacts. We also recommend the Final Subarea Plan include a summary of enhancement and restoration activities that will be implemented which quantifies the acreage of habitat enhanced and/or restored in the Managed Preserve to show the comparison between potential impacts and proposed enhancement/restoration activities.

In addition, Figures 4.5 and 4.7 of the Subarea Plan depict Covered Activities impacts within the Walker parcel that was purchased with State and Federal funds. Further coordination with the City is required to determine if proposed activities are consistent with the subgrant agreement. Lastly, as a reminder, any impact to waters, wetlands, and riparian habitat within the Plan Area will remain subject to Federal and State regulatory programs³, as applicable, which may require additional mitigation above and beyond that which is required under the Subarea Plan.

- b. *Defensible Space in Existing Open Space.* Defensible space is a proposed Covered Activity under certain conditions. However, the Subarea Plan contains contradictory descriptions of where these activities would occur. Thus, it is unclear whether the DEIR's conclusion that impacts to sensitive natural vegetation communities are less than significant (Threshold BIO#2; Section 4.2.3.2 of DEIR) is supported by substantial evidence. The Subarea Plan states that new defensible space is not allowed within the Managed Preserve except when conducted by the City in the San Diego River Subunit. As mentioned above, further coordination is required to determine if proposed Covered Activities, including defensible space, are consistent with the subgrant agreement for the Walker Preserve. The Subarea Plan also states impacts within Existing Protected Open Space (i.e., lands previously acquired for conservation or mitigation within the Plan Area but are not included in the Managed Preserve) are not included as a Covered Activity (Section 4.3.4 of the Subarea Plan). However, Figure 4-7 of the Subarea Plan (Attachment 4) depicts defensible space within Existing Protected Open Space along Sycamore Creek as a Covered Activity. To substantiate the finding that impacts to Threshold BIO#2 are less than significant, the EIR and Final Subarea Plan should resolve

³ The Department has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake, pursuant to section 1600 *et seq.* of the Fish and Game Code. For any such activities, the Project applicant must provide written notification to the Department to determine whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities.

these inconsistencies and clarify whether and how defensible space is allowed and mitigated in these areas.

- c. *Essential Public Projects*. The Subarea Plan is not clear on how impacts associated with Essential Public Projects (EPPs) would be mitigated. Thus, the DEIR does not provide sufficient information to evaluate that impacts to Threshold BIO#2, BIO#3, and BIO#4 (*Impacts to wildlife movement and habitat connectivity*; Section 4.2.3.4 of DEIR) would be less than significant. While impacts to the Managed Preserve must generally be avoided and minimized, the Subarea Plan allows up to 3.5 acres of EPP impacts over the permit term. To reduce Threshold BIO#2-4 to a level below significant, the EIR and Final Subarea Plan must clarify that EPPs will demonstrate that (1) avoidance is infeasible, (2) impacts have been minimized to the maximum extent practicable in accordance with Section 5.5 of the Subarea Plan, and (3) impacts will be mitigated in-kind in habitat type and quality through expansion of the Managed Preserve per the Uniform Mitigation Ratios provided in Table 5-13 of the Subarea Plan. In addition, without further specificity regarding the location or nature of proposed EPPs, these activities should be subject to Wildlife Agency review and approval.
 - d. *Proposed Trails in the Fanita Ranch Preserve*. The trail system for the Fanita Preserve depicted in Figure 4-3 of the Subarea Plan does not align with the conceptual trail plan coordinated with the Wildlife Agencies during Resource Management Plan (RMP) preparation. The trail system in Figure 4-3 does not support the finding that impacts to sensitive natural vegetation communities and special status plant and animal species (Threshold BIO#2 and BIO#1; Section 4.2.3.1 of DEIR) are less than significant. As previously discussed with the City and Fanita Ranch project proponents, the trail system must be compatible with the conservation goals and objectives of the Fanita Preserve and adhere to the trail siting criteria outlined in the Subarea Plan. The Final Subarea Plan and EIR should include an updated trail map for the Fanita Ranch Preserve, based on a Wildlife Agency-approved public access plan associated with the Fanita RMP.
2. Preserve configuration: To meet Federal and State permit issuance criteria, the proposed Managed Preserve must provide sufficient habitat for Covered Species in a configuration that supports their persistence in-perpetuity and is conserved commensurate (i.e., in rough step) with impacts from Covered Activities. We recommend revisions to the EIR and Final Subarea Plan as described below to reduce impacts to a level below significant.
- a. *San Diego River Conservation and Connectivity*. The Subarea Plan, as currently drafted, does not demonstrate adequate conservation and function of the San Diego River corridor within the Plan Area to support a less than significant CEQA conclusion for Threshold BIO#4. This section of the San Diego River provides essential habitat for Covered Species such as least Bell's vireo (*Vireo bellii pusillus*) and serves as a critical linkage and wildlife movement corridor to conserved lands to the east and west. The river is heavily urbanized along both the northern and southern boundaries. Continued development within the river corridor and adjoining habitat is likely to cumulatively impair the function of this regionally important linkage. To meet permit issuance criteria

and reduce impacts to connectivity to a level below significant, the Final EIR must demonstrate how Subarea Plan implementation will maintain the ecological linkage along the San Diego River at the western end of the Plan Area. We suggest further coordination with the City of San Diego and the area of Carlton Oaks Golf Course identified as “Not a Part” (Attachment 5).

Additionally, the Subarea Plan depicts approximately 109 acres of County of San Diego-owned land in the San Diego River floodway as “Future Development Areas” (Attachment 4), contrary to earlier drafts of the Subarea Plan that identified the area as “Future Conservation Opportunity”. It is not clear in the Subarea Plan whether development in this area would be allowed by the County of San Diego, as the Subregional Plan depicts this area as 90-95 percent conserved (Figure 1-2 of the DEIR). To be consistent with the Subregional Plan and given the importance of this section of the San Diego River corridor for riparian-associated Covered Species conservation objectives for wildlife movement and connectivity, we recommend the City coordinate with the County of San Diego to review roles and responsibilities for Covered Activities impacts for these lands, including the following:

- The City has identified proposed Covered Activities on County land in the San Diego River Subunit; if these activities proceed, the impacts will be addressed as Covered Activities under the City’s Subarea Plan.
- If the County proposes activities that will impact County-owned land in the San Diego River Subunit, impacts will be addressed consistent with the City’s Subarea Plan and the Subregional Plan, which depicts this area as 90-95 percent conserved.
- The City and County will work together to provide for the conservation and management of the County-owned land in the San Diego River Subunit in a manner consistent with the City’s Subarea Plan and the Subregional Plan.

The EIR and Final Subarea Plan should be updated with those roles and responsibilities to support a less than significant CEQA conclusion for Threshold BIO#4.

- b. *Fanita Ranch Impact and Preserve Phasing.* To meet Federal and State permit issuance criteria, the Subarea Plan must ensure that conservation of Covered Species and associated habitats occur in rough step (i.e., proportionally) to impacts from Covered Activities. Additionally, a more detailed description of the Fanita Ranch preserve phasing is needed to support a less than significant conclusion for Threshold BIO#1 and BIO#2. Per Section 5.3.1.1 of the Subarea Plan, the Fanita Onsite Preserve and Offsite Conservation Areas will be assembled in four phases, in conjunction with the development phases; however, Section 5.3.1.1 insufficiently demonstrates the required rough proportionality for species-specific conservation. The EIR and Final Subarea Plan should include a schedule of Preserve and Conservation Areas assembly to demonstrate that take of species and conservation for Covered Species are occurring roughly proportional to buildout of Covered Activities. For example, the analysis should include

whether the required cactus wren habitat restoration within the onsite preserve will be implemented during an early conservation phase to ensure receiver sites are available prior to impacts to occupied cactus wren habitat within the project footprint.

3. Wildlife Agency Concurrences and Approvals: The Subarea Plan identifies certain implementation actions that require approval by the City and/or coordination with, or approval by, the Wildlife Agencies. Below are instances where Wildlife Agency approval is not clearly required by the Subarea Plan but is requested in the Final Subarea Plan so that the Wildlife Agencies can monitor whether the Subarea Plan and all adopted mitigation measures are fully implemented as discussed and analyzed in the DEIR.
 - a. *Conservation Easements and Restrictive Covenants*. Per the Subarea Plan, all lands within the Managed Preserve must be perpetually conserved by recordation of a conservation easement or equivalent legal instrument including the Wildlife Agencies as third-party beneficiaries. A Conservation Easement (CE) template and a Restrictive Covenant (RC) template, each to be approved by the Wildlife Agencies, will be appended to the final Subarea Plan. However, any preserve-specific CE or RC will require specific approval from the Wildlife Agencies prior to recordation. We recommend the Final Subarea Plan and Implementing Agreement state that Wildlife Agency approval is required prior to CE and RC recordation.

In addition, Covered Activities proposed within lands protected by an existing recorded CE or RC (i.e., several City proposed trails within the San Diego River Subunit) that are prohibited by that CE or RC will require an amendment to the existing CE or RC prior to the initiation of impacts.

- b. *Habitat Loss Incidental Take Permits*. Certain Habitat Loss Incidental Take (HLIT) permits should require Wildlife Agency concurrence to ensure goals and objectives of the Subarea Plan can be met. Per the Subarea Plan, all Covered Activities would be required to obtain an HLIT permit that will quantify impacts to biological resources and define the required project-specific avoidance, minimization, and mitigation measures. HLITs would be processed and approved by the City and provided to the Wildlife Agencies as part of the annual report for the Subarea Plan. However, as is standard in other MSCP Subarea Plans (i.e., City of Chula Vista MSCP), there are certain instances where Wildlife Agency concurrence with an HLIT is required.

The Final Subarea Plan and upcoming HLIT Ordinance must clarify under which instances Wildlife Agency concurrence on a HLIT permit will be required, such as: (1) where development thresholds in the Subarea Plan would be exceeded (e.g., deviation from the 30/70 development to conservation criteria in the Upland Standards Areas); (2) where a Covered Activity deviates from the conservation standards outlined in Section 5.5 of the Subarea Plan; (3) whenever a biologically superior option is proposed; and (4) for any Essential Public Project within the Managed Preserve. In those instances, the City will notify the Wildlife Agencies in writing of the proposed HLIT and provide 30 days for a response. If the Wildlife Agencies do not concur with the proposed HLIT, the City

and Wildlife Agencies will confer to revise the HLIT and reach mutual concurrence.

Lastly, the Wildlife Agencies have not had a chance to review the latest draft of the HLIT Ordinance. Significance of impacts under CEQA and the basis of our permit issuance assumes that all Covered Activities and commensurate mitigation are carried out subject to the provisions of the Subarea Plan which ensures the fulfillment of the conservation strategy outlined in the Subarea Plan. Any proposed changes to the HLIT Ordinance that may alter the conservation strategy outlined in the Subarea Plan could result in the need to re-circulate the draft EIR. Please provide the latest version of the HLIT Ordinance for our review.

- c. *Preserve Managers.* Government Code Section 65967(c) requires the Department to exercise due diligence when approving entities to manage and steward mitigation lands. As the Managed Preserve provides mitigation for impacts from Covered Activities, the Department must exercise this due diligence by approving Preserve Managers. There is currently a lack of consistency in the Subarea Plan on whether selection of individual Preserve Managers for the Managed Preserve is subject to approval by the Wildlife Agencies. Section 5.3.1.2 requires Wildlife Agency approval of Preserve Managers other than the City Preserve Manager for private preserves in the Upland Standards Areas. Chapter 7 references only City approval of Preserve Managers. We recommend revising the Final Subarea Plan to clarify that Wildlife Agency approval of Preserve Managers, including the City Preserve Manager, is required.
4. Funding: As a Permittee under the Subarea Plan, the City is responsible for ensuring that adequate funding will be available to implement the Subarea Plan and appropriate processes will be in place to ensure the management and monitoring requirements are met. The Subarea Plan does not include sufficient information to meet Federal and State permit issuance criteria regarding funding assurances. A lack of clarity and detail regarding funding may lead to uncertainty on whether the proposed mitigation can be implemented and therefore whether it will effectively lessen impacts to a level below significant. Absent these details, the Subarea Plan lacks sufficient information to meaningfully evaluate whether Threshold BIO#1-4 of the DEIR would be mitigated to a level below significant. Therefore, additional information is requested to be included in the Final Subarea Plan, as outlined below.

Funding assurances should be based on estimates of the costs for implementation (e.g., City positions, development of RMPs, management and monitoring of the Managed Preserve) and how those costs will be funded (e.g., City General Fund, private project proponents, endowments). The Wildlife Agencies request the following information be added or clarified in the EIR and Final Subarea Plan: (1) reasonable estimates of costs for implementation of the RMPs for City managed preserves and responses to each Changed Circumstance, including contingency costs, both during the Permit term and in-perpetuity; (2) the basis for any cost estimates used in the funding analysis; (3) distinction between one-time costs and costs during and post permit term; and, (4) confirmation of adequate perpetual conservation funding for the Managed Preserve (amounts, sources, and structure), to include adaptive management and contingency funds. Additional specific comments on Table 8-2 (*Subarea*

Plan Implementation Actions Requiring Funding) of the Subarea Plan are included in Attachment 1.

5. Implementing Agreement: The draft Implementing Agreement (IA) outlines several implementation details that may be infeasible or lack sufficient detail to provide adequate conservation assurances. Additionally, the draft IA has numerous inconsistencies with the Subarea Plan including outdated and/or incorrect information. The IA must provide sufficient detail to support the Department's ability to make required Findings under the NCCP Act, including that the Subarea Plan ensures the conservation and management of Covered Species and habitats over the Permit Term and beyond. Furthermore, the IA must clearly articulate the roles, responsibilities, and enforceable commitments to ensure the Subarea Plan will be implemented as intended. Please be aware that the Service no longer signs Implementing Agreements for most plans. Therefore, the document will need to be updated to reflect that change. The comments below are the Department's major comments, with more specific and additional comments provided under separate cover.
 - a. *Future Environmental Review Under CEQA (Section 9.3.4)*. The IA incorrectly states that, "with respect to the implementation of a Covered Activity, CDFW will not require, recommend, or request the imposition of additional or more stringent minimization or mitigation measures directed at the protection or conservation of Covered Species **or their habitats**" (emphasis added) when the Department acts as a lead, responsible, or trustee agency under CEQA. In approving an NCCP, the Department can only assure the plan includes adequate mitigation and conservation for covered species pursuant to the NCCP Act. However, conservation standards and requirements vary by program and there are instances where CDFW, as a responsible agency administering other programs, such as CESA and Fish and Game Code Section 1600 *et seq*, may require additional or more stringent measures beyond what is required under an NCCP. For example, in the event a CESA-listed species that is not covered under the Subarea Plan overlaps the same habitat as a Covered Species, the Department may require mitigation for impacts to the listed species under CESA that is additional to that required under the Subarea Plan.
 - b. *Subarea Plan Managed Preserve Management (11.3) and Regional Habitat Management Technical Committee (11.5.1)*. These sections contain remnant language from outdated past drafts and should be revised accordingly. Section 11.3 references the Framework Management Guidelines and area-specific management directives which are not currently components of the Subarea Plan. Section 11.5.1 commits the City to join the Regional Habitat Management Technical Committee, which no longer exists due to a lack of a Regional Funding Source. The San Diego Management and Monitoring Program (SDMMP) coordinates a regional land manager working group that functions similarly to the HMTTC in a limited capacity. The Department requests that this section be updated to reflect the current conditions and reference the SDMMP land managers group or other equivalent regional land management group as presently exists in lieu of the HMTTC.
 - c. *Funding Responsibilities of the City (Section 15) and Annual Reporting and Public Workshop (16.1)*. Section 15 implies that the Subarea Plan's funding estimates are based

upon the cost estimates within the MSCP Subregional Plan, which are nearly 30 years out of date and do not reflect current costs of habitat acquisition, management, and monitoring. This Section should be updated accordingly as per Comment 4 above. Additionally, Section 16.1 should specify that detailed financial reporting is a required component of the Annual Report such that the Wildlife Agencies can effectively monitor compliance and provide guidance to the City on implementation of the Subarea Plan.

- d. *Biological Monitoring (Section 16.4)*. This section contains outdated information based upon incorrect assumptions of the MSCP Subregional Plan and therefore does not ensure the biological monitoring and adaptive management required for permit issuance. We request that this section be revised to reflect current conditions. Specifically, this section states that biological monitoring will be funded through a regional funding program, a provision of the Subregional MSCP that has yet to be established. All biological monitoring required by the Subarea Plan must have assured funding. Additionally, Section 16.4 states that the Wildlife Agencies will assume primary responsibility for coordinating a regional biological monitoring program that collects and analyzes data to provide information and technical assistance to Participating Local Jurisdictions. While the Wildlife Agencies remain committed to providing technical expertise and guidance to MSCP permittees, we do not have the capacity to coordinate the biological monitoring program. The City is responsible for meeting all permit issuance criteria, including collecting and analyzing all biological monitoring data collected pursuant to the Subarea Plan within the Plan Area. Monitoring data should be shared with regional conservation partners to meet the MSCP Subregional Plan's goal of implementing a cohesive, region-wide conservation strategy.
6. Changed Circumstances: Within the context of the Subarea Plan, a Changed Circumstance is defined as a change in circumstance affecting a Covered Species or geographic area within the Plan Area that can be reasonably anticipated by the City and Wildlife Agencies and for which planned responses are identified. Including planned responses to Changed Circumstances in the Subarea Plan allows the City to account for and address foreseeable changes impacting the Managed Preserve from a management and monitoring perspective. To further support the success of Subarea Plan implementation, the Wildlife Agencies suggest expanding Changed Circumstances to include recreational changes.
- a. *Increased Recreational Intensity in Managed Preserve*. Changed Circumstances currently identified by the Subarea Plan include fire, flood, prolonged drought, and an increase or spread of invasive species. Section 8.7.2 of the Subarea Plan provides risk assessments, threat reduction measures, and planned responses for each circumstance. In addition to those circumstances, recreational activities are another known threat to Covered Species (as cited in Sections 3.4 and 3.5 of the Subarea Plan). Per Section 4.3.3, conditionally compatible uses identified in the Subarea Plan would be monitored, patrolled, and managed to ensure they are consistent with the conservation of biological resources. However, recent years have demonstrated an increase in recreational pressure on other MSCP preserves resulting in increased impacts to conserved lands and species. To more explicitly account and plan for this foreseeable change in circumstance, the Wildlife

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Agencies recommend the Final Subarea Plan include increased recreational intensity in the Managed Preserve as a Changed Circumstance with an associated risk assessment, threat reduction measures, and planned responses (e.g., increased patrols, trail closures, limited access to sensitive or recovering areas, restoration, or expanded public outreach).

7. Proposed Introduction of Riverside fairy shrimp and San Diego mesa mint: Table 5.1 of the Subarea Plan references an introduction program for these species to the Fanita Ranch Onsite Preserve. These species are not known to occur in the Plan Area and introduction of any species, whether Covered or non-Covered, would require the development of a translocation plan and approval by the Wildlife Agencies. Section 4.2.9.1 of the Subarea Plan (*Preserve Management Activities*) considers allowance for translocation within Preserves for unavoidable impacts in close coordination with the Wildlife Agencies.

We appreciate the City's continued coordination and collaboration with the Wildlife Agencies over the past year to develop a draft Subarea Plan for public review and we look forward to continuing to work with the City to finalize the Santee MSCP Subarea Plan in a manner that will meet permit issuance criteria. If you have questions or comments regarding this letter, please contact Heather Schmalbach⁴ of the Department and Samantha Padilla⁵ of the Service.

Sincerely,

**JONATHAN
SNYDER**

Jonathan D. Snyder
Assistant Field Supervisor
U.S. Fish and Wildlife Service

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Date: 2025.09.22 14:28:37
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Glen M. Lubcke
Environmental Program Manager
California Department of Fish and Wildlife

Attachments:

- Attachment 1: Additional Wildlife Agency Comments and Requested Revisions
- Attachment 2: Figure of Santee MSCP Subarea Plan Area
- Attachment 3: Santee MSCP Subarea Plan Proposed Covered Species List
- Attachment 4: Santee MSCP Subarea Plan Future Development Areas
- Attachment 5: Santee MSCP Subarea Plan Preserve Habitat Connectivity and Linkages

cc:

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⁷ Susan_Wynn@fws.gov

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Attachment 1: Additional Wildlife Agency Comments and Requested Revisions

Document/Section	Comment
Subarea Plan/Section 1.1	The Service no longer signs Implementing Agreements for most HCPs. Please update this section and Appendix A to reflect this change. In addition, the following sentence should be added to the subarea plan “The Implementing Agreement cannot alter the terms of the federal permits.”
Subarea Plan/Section 1.1.2	This section makes reference to Federal wetland regulations. We recommend clarifying that coverage of wetland species does not rely on implementation of federal regulations that may change over time but instead is ensured through implementation of the Subarea Plan itself and its implementing ordinance (HLIT). In addition, please delete the following sentence: However, this Subarea Plan requires that the City comply with the wetlands protection measures stipulated in the Clean Water Act 404(b)(1) (40 CFR Part 230).
Subarea Plan/Section 1.1.3	The City of San Diego’s permit was issued in 1997, and the City of La Mesa was issued in 2000. Please update the first sentence to reflect these dates.
Subarea Plan/Section 2.3.4.1	There are inconsistencies between the text and tables in this section that need to be clarified. As an example, the definition for Partially Conserved states that these are grant funded parcels yet Table 2.6 lists both Mast Park parcels in this category. Another example is Railroad Avenue, which has a Conservation Easement and a funded management plan but is listed in the Other Protected Open Space Category. This section references 167.3 acres of City-owned protected open space, and Table 2.5 lists this acreage as “Other Protected Open Space.”: However, it is unclear from Table 2.6 which properties are included in this acreage. Please update Table 2-5 column 2 (Total Acres) to include all the parcels identified in Table 2.6 as “Other Protected Open Space”, not just the City Owned, and update Table 2.6 to identify which parcels constitute the above-mentioned 167.3 acres. In addition, language should be added to the Subarea Plan that the City Preserve Steward will coordinate with landowners and managers of other Protected Open Space to ensure that these lands are managed consistent with the Managed Preserve to the greatest extent practicable. As separate funding becomes available (e.g., grant funds) the City may work with the landowners and managers of Other Protected Open Space to implement additional recommended management.
Subarea Plan/Chapter 3	The recent change in CESA status for Quino checkerspot butterfly (Quino) should be updated throughout the Final Subarea Plan (and

	Final DEIR). As of August 20, 2025, Quino is considered a candidate species for listing under CESA.
Subarea Plan/Section 4.2.8.1	Recommend adding a definition and description of the “Fuel Hazard Reduction Area” depicted on Figure 4-5, including what is a Covered Activity under the Subarea Plan, anticipated impacts, and any associated mitigation requirements. In addition, please clarify how the acreages listed here for the San Diego River Subunit relate to the projected 37.6 acres of impacts described in Section 4.3.2.3.
Subarea Plan/Chapter 4/Table 4-3	We recommend the following revisions to Table 4-3 for clarification of Covered Activities by location: ○ Remove “Recreational Facilities and Maintenance” since it is no longer described as a Covered Activity in this draft ○ Rename “Land Development” as “Planned Development” and leave check under Hardline Development Project column. ○ Add row for “Future Development Activities” and check under Upland Standards Areas and Infill Development Areas. ○ Add footnote that Future Defensible Space Zones in Managed Preserve are limited to City activities in the San Diego River Subunit. ○ Remove general “Operations and Maintenance Activities” and add rows for “Drainage Maintenance” and “Vector Control” (trail maintenance and defensible space maintenance already have their own rows).
Subarea Plan/ Figure 4-7	Please update the legend to remove Riparian/Aquatic Habitats from the Future Development Areas.
Subarea Plan/Section 4.3.4	Although the intent is good, in the absence of a definition for “activities” and “existing open space,” the last bullet is mis-leading as there are several Covered Activities that can occur within existing open space (e.g., defensible space in the San Diego River Unit, EPPs). Please clarify.
Subarea Plan/Section 4.4.2 Figures and Table 4-7	All species-specific figures showing known occurrences and modelled suitable habitat relative to future development areas (Figures 4-8 through 4-27) depict “Future Development Areas” within the San Diego River floodway. As a result, the estimated impact numbers for riparian-associated Covered Species, such as San Diego ambrosia and least Bell’s vireo, are much higher than those in prior drafts of the Subarea Plan reviewed by the Wildlife Agencies. Mapping these areas as potential development, despite the constraints of the floodway and the Subarea Plans conservation standards regarding aquatic, wetland, and riparian habitats, may inaccurately depict potential impacts from Covered Activities. We recommend the Final Subarea Plan revises the figures and impact calculations to more accurately reflect anticipated loss of and

	conservation of habitats within these areas of the San Diego River corridor. These same edits should also be made throughout the Final EIR.
Subarea Plan/Section 4.4.2.8	Please update the impact and conservation numbers for willow monardella to match the revised tables. We also recommend adding a reference to the application of Section 5.5.8 (<i>Covered Plant Species Translocation and Restoration Conservation Standards</i>) which would limit impacts to newly discovered populations of this species.
Subarea Plan/Chapter 5/Table 5-1	We recommend the following revisions to Table 4-3 for clarification of the conservation strategy (corrections below based on numbers in Table 4-2 of DEIR and Table 6-6 of Subarea Plan): ○ S-1.1: correct total acres in Managed Preserve = 334.6 acres, not 324.4 ○ S-2.1: total acres in Managed Preserve = 1,607.0 acres not 1,613.3 ○ S-7.3 and S-8.3: add reference to Translocation and Restoration Conservation Standards (Section 5.5.8), which applies to both species ○ S-9.1: the total conservation numbers for this species do not match between Table 4-2 and 6-6 (2,259.6 vs 2,055.4 acres) due to a difference in conservation on the Hardline Preserve (1,763.3 vs 1,592.2 acres) ○ S-9-2: correct citation for species-specific standards = should be 5.5.9.6 instead of 5.6.9.6 ○ S-10.2: add reference for species-specific standards (Section 5.5.9.3) ○ S-16.2: add that 24 occupied features will be conserved over the permit term ○ S-16.4: add references for species-specific standards (5.5.9.2) and vernal pool conservation standard (5.5.7)
Subarea Plan/Section 5.3.1.3	This section needs to be updated as described in the body of the letter above.
Subarea Plan/Section 5.3.1.5	Recommend removing this section on Infill Development Areas. These areas are not part of the Subarea Plan Managed Preserve, so the discussion seems out of place in this section. In addition, this information is redundant with that provided in Section 4.3.2.2.
Subarea Plan/Section 5.3.2	Please include the following definitions in a footnote to this section in the Final Subarea Plan: ○ Ecological linkages under the Plan are swaths of natural land that are conserved to enhance or protect the ability of plants, wildlife, and ecological resources to move among larger natural community/habitat patches. Linkages are typically

	wider connections between core areas where both important plant and animal species live (and move) within functional "live-in" habitat found across the breadth of the linkage, whereas the term wildlife corridor suggests a single conduit for wildlife movement [[Gregory, A., Spence, E., Beier, P. and Garding, E. 2021. Toward best management practices for ecological corridors. Land, 10(2), p.140.]]. ○ Wildlife movement corridors under the Plan are linear landscape features (e.g., a strip of land that differs from the surrounding matrix) that facilitate movement of fauna between core ecological areas. Corridors are typically narrower than linkages and often do not provide "live-in" habitat for many sensitive plant or animal species along its length but are expected to provide functional and viable movement routes for specific target species. [[Hobbs, R.J., 1992. The role of corridors in conservation: solution or bandwagon? Trends in Ecology & Evolution, 7(11), pp.389-392.; Hess, G.R. and Fischer, R.A., 2001. Communicating clearly about conservation corridors. Landscape and urban planning, 55(3), pp.195-208.]
Subarea Plan/Section 5.3.3.3	For third bullet section, correct citations for Nesting Birds Conservation Standards (5.5.1.2, not 5.5.5.2) and re-add Aquatic, Wetlands, and Riparian Protection Standards (Section 5.5.5).
Subarea Plan/Section 5.3.3.5	For CM-21 (Crotch's bumble bee) we request the following revisions be included in the Final Subarea Plan: ○ Remove the following sentence from the end of the second bulleted paragraph: "There are no approvals required from the City of Wildlife Agencies or additional coordination requirements." ○ Move the following sentence from the end of the third bulleted section to the end of the first paragraph of the section (after Baseline surveys will and periodic monitoring will be performed within the Onsite Preserve Areas): "If project activities occur outside of the Colony Active Period, then pre-construction surveys for active bee nest colonies and avoidance measures are not required." ○ Update with results of baseline surveys conducted in 2025.
Subarea Plan/Chapter 5/Figure 5-8	Some Uplands Standards Areas are mistakenly mapped as Infill Development Areas. Please correct in Final Subarea Plan.
Subarea Plan/Chapter 5/Table 5-12	As commented on in prior drafts of the Subarea Plan, this table may cause more confusion than clarity. Recommend removing Table 5-12 from the Final Subarea Plan and adding a sentence to the opening paragraph of Section 5.5 stating that the following

	measures apply to all Covered Activities other than the Hardline Project. If the City decides to leave Table 5-12 in the Subarea Plan, we request the following revisions: for Infill Development Areas please add that the following measures will apply – 5.5.5, 5.5.6, 5.5.7, 5.5.9.2, 5.5.9.3, 5.5.9.4, and 5.5.9.6. Section 5.3.1.5 states “[as] future Covered Activities occur with the Infill Development Areas, the Subarea Plan does require that projects address avoidance, minimization, and mitigation measures per the Subarea Plan (see Section 5.5, Avoidance, Minimization, and Mitigation Measures),” implying that the sections listed above would apply. Since some may not apply if suitable habitat for certain species is absent, we recommend adding a caveat, such as “as determined through the HLIT process.”
Subarea Plan/Section 5.5.1.2	We request the following text revisions to this section be included in the Final Subarea Plan: ○ First bullet: “Proposed Covered Activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) will occur outside of the avian breeding season defined here as February 15 to September 30 (or as early as January 1 for some raptor species) to avoid disturbance to ~~most~~ breeding birds or destruction of the nest or eggs.” ○ Second bullet: “If avoidance of the avian breeding season is not feasible, ~~then pre-project surveys will be conducted no earlier than 72 hours at least 2 weeks~~ prior to the initiation of Covered Activities by a qualified biologist with experience in conducting breeding bird surveys to determine nesting activity.” ○ Second bullet: Remove the following sentence – “The surveys will continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. Flagging, stakes, and/or construction fencing will be used to demarcate the inside boundary of the buffer between the project activities and the nest. The project proponent personnel, including all contractors working onsite, are required to be instructed on the sensitivity of the area.”
Subarea Plan/Section 5.5.6	For "Determining Impacts" please replace the last sentence for San Diego ambrosia as follows: “~~Due to the clonal/rhizomatous nature of San Diego ambrosia and the fact that although perennial, the above-ground portions of this species (ramets) are only detectable during the growth season (similar to geophytes), impacts and avoidance requirements will be determined by occupied acreage or~~

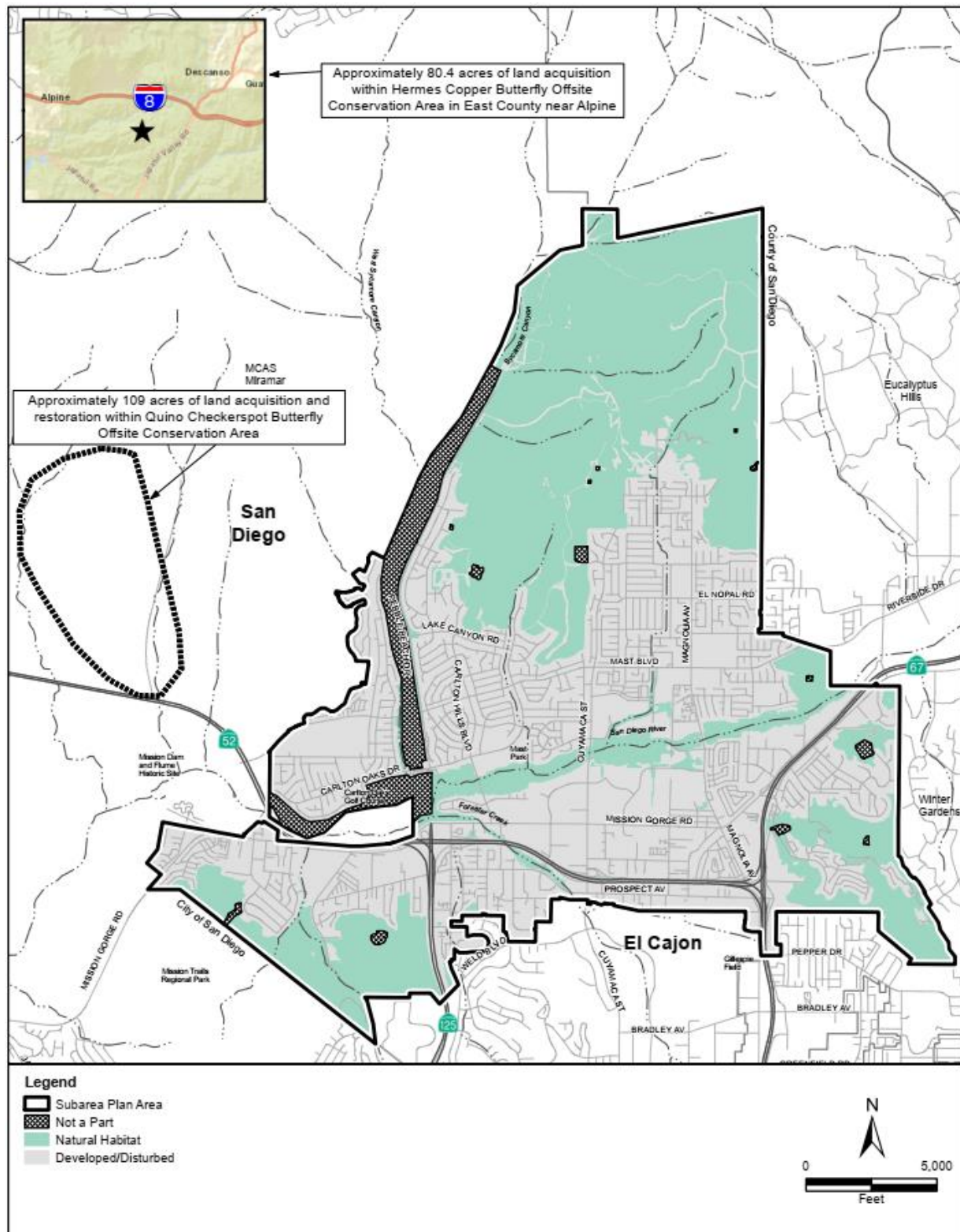
	patch size as delineated when the ramets are visible.” ~~For perennial plants other than geophytes (i.e., Ambrosia pumila), the allowable impact shall be based on population size (i.e., number of standing/above ground individuals) in a contiguously occupied area of habitat.~~
Subarea Plan/Section 5.5.9	Please add clarification in the Final Subarea Plan that the mitigation ratio(s) cited under each species-specific conservation standard are not additive with the uniform mitigation ratios in Table 5-13, but that the highest ratio cited will apply.
Subarea Plan/Section 5.5.9.3	This section was heavily revised from the last version reviewed by the Wildlife Agencies. For all County and federal guidelines referenced, in addition to the website links cited these documents should be added to Appendix F.
Subarea Plan/Section 5.5.9.6	Please add the following measure as #5 in the Final Subarea Plan: Mitigation for impacts to occupied Crotch's bumble bee habitat will occur in accordance with the uniform mitigation ratios provided in Section 5.5.2, where applicable, or through onsite conservation within the Uplands Standards Areas.
Subarea Plan/Section 6.3.2	Please include the Wildlife Agencies in the review and approval of Vernal Pool Mitigation Plans.
Subarea Plan/Section 6.4.1.1	Please revise the following text as follows: “As required by the Narrow Endemic Species Standards found in Section 5.5.6, implementation of the Subarea Plan will permanently protect, manage, and monitor San Diego ambrosia occurrences within the Managed Preserve and ~~preserve a minimum of 80 percent of identified a minimum of 80 percent preservation and/or translocation of all newly identified locations-occurrences~~ within future Covered Activity project footprints.”
Subarea Plan/Section 6.4.6.1	Please revise the following text as follows: “As required by the Narrow Endemic Species Standards found in Section 5.5.6, implementation of the Subarea Plan will permanently protect, manage, and monitor San Diego thornmint occurrences within the Managed Preserve and ~~preserve a minimum of 80 percent of identified a minimum of 80 percent preservation and/or translocation of all newly identified locations-occurrences~~ within future Covered Activity project footprints.”
Subarea Plan/Section 6.4.7.1	Please revise the following text as follows: “As required by the Narrow Endemic Species Standards found in Section 5.5.6, implementation of the Subarea Plan will permanently protect, manage, and monitor variegated dudleya occurrences within the Managed Preserve and ~~preserve a minimum of 80 percent of identified a minimum of 80 percent preservation and/or translocation of all newly identified locations-occurrences~~ within future Covered Activity project footprints.”

Subarea Plan/Section 6.4.8.1	Please revise the following text as follows: ~~“As required by the Narrow Endemic Species Standards found in Section 5.5.6., implementation of the Subarea Plan will permanently protect, manage, and monitor willowy monardella occurrences within the Managed Preserve and a minimum of 80 percent preservation and/or translocation of all newly identified locations within future Covered Activity project footprints.~~ As required by the Covered Plant Species Translocation and Restoration Conservation Standards found in Section 5.5.8, if willowy monardella occurs within the impact area for a Covered Activity project area, the project proponent will be required to demonstrate 80 percent of the occurrences/populations will be protected in perpetuity through protection and/or translocation/restoration within the Managed Preserve.”
Subarea Plan/Section 7.2.3.5	Please replace existing text for “Brush control or defensible space management” with the following: Brush control or defensible space management , except where it is necessary on existing Preserves to prevent the loss of human life or property during a fire event or to prevent the loss of or to enhance sensitive biological resources. New developments adjacent to Preserves must accommodate defensible space zones or other vegetation management actions outside of the Managed Preserve boundary and not encroach into the Managed Preserve.
Subarea Plan/Section 7.2.3.7	Please remove the following bullet from under the Trail Siting Criteria and put it under the Recreation Management Plan requirements: “Construct trails to prominent features or viewpoints, as ecologically appropriate, which are likely to attract trail users, thereby preventing off-trail trampling and compaction.” This approach can be discussed as part of the Resource Management Plan development process, but it is not an appropriate trail siting criteria.
Subarea Plan/Chapter 7/Table 7-2	We request the following revisions to the section on Crotch’s bumble bee: ○ At the end of the fourth bullet for Population Assessments it should cite 3 rounds of surveys instead of 35 rounds of surveys. ○ Please remove the fifth and sixth bullets under Population Assessments regarding nest surveys and replace them with the following: ▪ The qualified biologist will focus their time within areas with a high abundance of nectar and pollen sources that are commonly associated with Crotch’s bumble bee and/or that are considered attractive to bumble bees in general. The

	qualified biologist will meander through these focused nectar/pollen source areas at a rate of no more than 2.5 acres per hour. Given that nectar/pollen source areas shift during the course of the blooming season, the qualified biologist will adjust the focused nectar/pollen source areas during each survey round as needed. Searching for potential nest sites will not be conducted due to the difficulty of finding nest sites and to allow more time to focus on searching at nectar/pollen sources. <i>Bombus</i> individuals will be only identified visually and will not be netted unless the surveyor has a valid Memorandum of Understanding (MOU) issued by CDFW to conduct such activities. Detected bee species will be photographed to the greatest extent feasible and recorded to identify to species. Data collected at each detection location will include GPS point location, habitat type, nearby nectar/pollen source species list, and observed nest site nearby (if applicable).
Subarea Plan/Section 7.2.6.2	Please add the following measures, specific to Crotch's bumble bee, to subsection #1 <i>Protect known occurrences and suitable habitat</i>: ○ Limit use of herbicides and insecticides during the bloom period of potential floral resources and avoidance all applications of insecticides during the Crotch's bumble bee queen and gyne flight seasons (February-March and September-October, respectively). If chemical control is necessary, apply pesticides in a targeted manner and use application methods that minimize drift to adjacent habitat (e.g., backpack sprayer). Pesticides should be screened through the UC IPM Bee Precaution database; none in the level III (red) category shall be applied within 100 ft of the Managed Preserve; and whenever possible, the least toxic formulation should be used. ○ Avoid introduction of honeybee hives within the Managed Preserve. New honeybee hives located within 0.5 mile of the Managed Preserve will be required (as legally allowed) to be regularly screened for disease to minimize the potential for spread of disease from managed honeybees to Crotch's bumble bee.
Subarea Plan/Chapter 8/Table 8-2	We have the following comments and/or requested revisions to Table 8-2:

	○ Please add a footnote indicating that if City positions (City Subarea Plan Coordinator and City Preserve Steward) are not filled within 30 days of permit issuance, no HLITs can be approved by the City until the positions are filled. ○ This version of the table fails to clarify which items are one-time costs, permit term costs, or in-perpetuity costs. Please clarify based on the following: ▪ One-time costs = Resource Management Plans and Interim Management of preserves ▪ Permit term costs = City Subarea Plan Coordinator and City Preserve Steward ▪ In-perpetuity costs = City Preserve Manager, management and monitoring of the Managed Preserve, responses to Changed Circumstances ○ For “Responses to Changed Circumstances” under City Actions/Funding remove reference to Project proponents (this is the City-only section). Also correct the Funding source to: “General Fund during term of Permits, non-wasting endowment after term of Permits”. ○ For all “Responses to Changed Circumstance” rows: Timing is “In perpetuity”. Cost methodology should read: “Costs shall be determined based on anticipated frequency and number of responses for each changed circumstance, as outlined in the applicable RMP and estimated by the PAR; including contingency funds (set at 10% of annual management costs).” Can add rationale for Cost Estimate as a footnote. ○ The funding source and cost methodology are missing for Hardline Project interim management/RMP. ○ For “Long-term management and monitoring” of the Hardline preserve, the costs provided are based on implementation of the conservation measures rather than long-term management/monitoring. If the funding is going to be phased, that should also be reflected in the table (e.g., “Per phase at time of dedication”). In addition, timing for interim management would be from “Upon approval of the SAP until approval of RMP and dedication of phase”.
Subarea Plan/Section 8.4.1	Table 8-2 indicates that long-term management of the City-owned Managed Preserve will be funded through the City’s General Fund during the permit term and by an endowment post-permit term. However, how this endowment will be established, funded, and managed is not described in Section 8.4.1. The Final Subarea Plan should include these details. We recommend considering a minimum annual payment, starting the second year of Subarea Plan implementation, into a separate endowment fund. The annual

	payment would be adjusted annually using Consumer Price Index. Principal, interest, dividends and earnings would remain in the fund until the end of the permit term at which time it should assure funding for the perpetual management of the City-owned Managed Preserve. This approach allows the endowment to grow over time and avoids the need for a one-time payment to establish the full endowment fund at the end of the permit term.
Subarea Plan/Section 8.6.3	For the third bullet under “Examples of Major Amendments to the Subarea Plan include” please edit to read: “Addition of lands to and removal of lands from the Plan Area.”
Specific comment by the Department	Section 4.2.3.1 of the DEIR concludes that application of the Subarea Plan’s general avoidance, minimization, and mitigation measures will ensure potential temporary and permanent impacts to special status species not covered by the Subarea Plan would be less than significant (Threshold BIO#1). This may be the case for some species, such as avian species that would benefit from the Nesting Birds Conservation Standards. However, there are other special-status species – such as bats and other small mammals – that may require additional avoidance, minimization, and mitigation measures to ensure a less than significant impact under CEQA. We recommend that the Final EIR include a statement that additional avoidance, minimization, and mitigation measures may be required (as determined through future project-specific CEQA analysis for Covered Activities) to ensure potential impacts to special status species not covered by the Subarea Plan are less than significant.
Specific comment by the Department	The Subarea Plan states funding for management and monitoring of the Hardline Project preserve (Fanita Ranch Onsite Preserve) will be through a Community Facilities District (CFD). Please note that use of a CFD as a funding mechanism for management of mitigation lands requires approval by the Director of the Department prior to the CFD being formally established.



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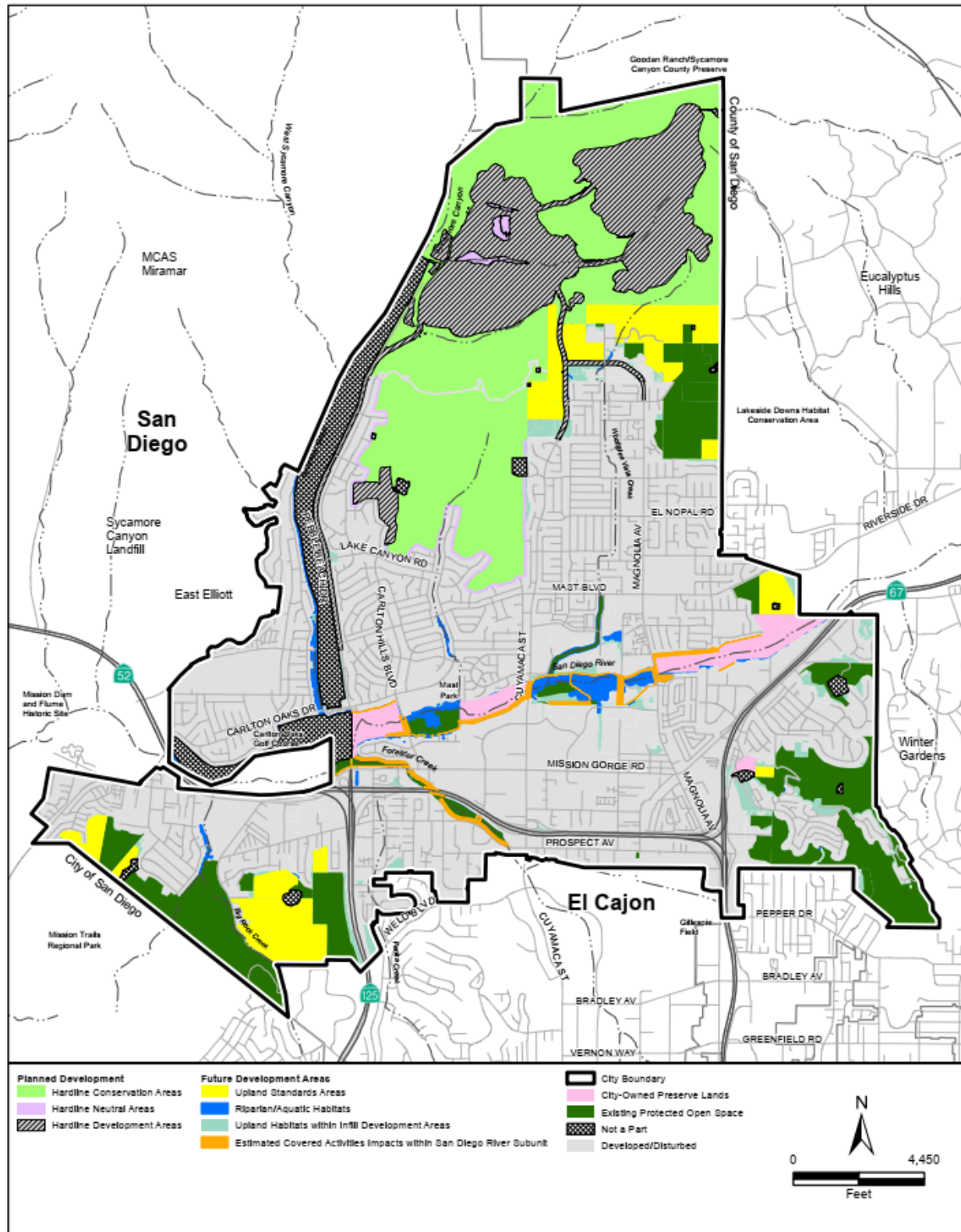
Attachment 3: Santee MSCP Subarea Plan Proposed Covered Species List

Common Name ^a	Scientific Name ^a	Status ^b Federal/State/CRPR
Plants		
San Diego ambrosia	<i>Ambrosia pumila</i>	FE/-/1B.1
San Diego barrel cactus	<i>Ferocactus viridescens</i>	-/-/2B.1
San Diego button-celery	<i>Eryngium aristulatum</i> var. <i>parishii</i>	FE/SE/1B.1
San Diego goldenstar	<i>Bloomeria clevelandii</i>	-/-/1B.1
San Diego mesa mint	<i>Pogogyne abramsii</i>	FE/SE/1B.1
San Diego thornmint	<i>Acanthomintha ilicifolia</i>	FT/SE/1B.1
Variegated dudleya	<i>Dudleya variegata</i>	-/-/1B.2
Willow monardella	<i>Monardella viminea</i>	FE/SE/1B.1
Invertebrates		
Crotch's bumble bee	<i>Bombus crotchii</i>	-/CSE
Hermes copper butterfly	<i>Lycaena hermes</i>	FT/-
Quino checkerspot butterfly	<i>Euphydryas editha quino</i>	FE/-
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	FE/-
San Diego fairy shrimp	<i>Branchinecta sandiegonensis</i>	FE/-
Reptiles and Amphibians		
Belding's orange-throated whiptail	<i>Aspidoscelis hyperythra beldingi</i>	-/WL
Blainville's horned lizard	<i>Phrynosoma blainvillii</i>	-/SSC
Western spadefoot	<i>Spea hammondi</i>	-/SSC
Birds		
Coastal cactus wren	<i>Campylorhynchus brunneicapillus couesi</i>	-/SSC
Coastal California gnatcatcher	<i>Polioptila californica californica</i>	FT/SSC
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE/SE
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	-/CSE
^a Species taxonomy and common names are based on the following sources: Plants: <i>The Jepson Manual</i> , 2 nd edition (Baldwin et al. 2012). Invertebrates: California Department of Fish and Wildlife (CDFW) <i>Special Animals List</i> July 2017. Amphibian and reptiles: <i>Society for the Study of Amphibians and Reptiles (SSAR) North American Species Names Database</i> (accessed September 1, 2017). Birds: <i>USFWS Environmental Conservation Online System (ECOS)</i> (Accessed September 1, 2017). Cactus wren nomenclature follows Checklist of North American Birds (Chesser et al. 2023). ^b Status Explanation: Federal – FE: Federally Endangered, FT: Federally Threatened. State – SE: State Endangered, CSE: Candidate for State Endangered, SSC: CDFW Species Special of Concern, WL: CDFW Watch List. California Rare Plant Ranking (CRPR) – 1B.1: CRPR for Plants Rare, Threatened, or Endangered in California and Elsewhere, and Seriously threatened in California, 1B.2: CRPR for Plants Rare, Threatened, or Endangered in California and Elsewhere, and moderately threatened in California 2B.1: CRPR for Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere, seriously threatened in California. Applicable status as reported in CDFW Special Animals List July 2017 and CDFW Special Vascular Plants, Bryophytes, and Lichens List July 2017.		

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Attachment 4: Santee MSCP Subarea Plan Future Development Areas



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Attachment 5: Santee MSCP Subarea Plan Preserve Habitat Connectivity and Linkages

