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GAVIN NEWSOM, Governor
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March 27, 2020

Mr. Michael Coyne
Project Planner
City of Santee
Department of Development Services
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Governor's Office of Planning & Research

MAR 27 2020

STATE CLEARINGHOUSE

Subject: Comments on the Mitigated Negative Declaration for the Lantern Crest Ridge II Project in Santee (SCH# 2020029092)

Dear Mr. Coyne:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the Lantern Crest Ridge II Project (Project), dated February 27, 2020. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Santee (City) participates in the NCCP program through the preparation of its Multiple Species Conservation Program (MSCP) draft Subarea Plan (SAP).

The 2.74-acre site is a single parcel located north of Sunset Trail, east of Graves Avenue, and approximately 0.13 mile east of State Route 67. The Project proposes the construction of a 46-unit senior care facility, four independent senior living units, and 16 parking spaces. Additional development includes three biofiltration basins, an access road, and cul-de-sac.

The Project is not located within a designated preserve area of the SAP, but it is directly adjacent to the Rattlesnake Mountain Preserve System (Preserve System) Subunit of the Multi-Habitat Planning Area (MHPA). The parcel is undeveloped, and according to the Biological Resources Survey Report (Scheidt 2018) supports 1.01 acres of Diegan coastal sage scrub (CSS) in the northern half, and a mixture of 1.30 acres of non-native grassland and 0.43 acre of non-native vegetation in the lower half. The site is occupied by the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) (Scheidt 2018).

The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources and to ensure that the proposed project is consistent with on-going regional habitat conservation planning.

Conserving California's Wildlife Since 1870

General Comments

1. As specified in Section 1.7 *Weed/Brush Abatement and Urban Wildland Interface Ordinance* of Appendix H in the SAP, “fuel modification standards include the provision of a minimum of 100 feet of fuel modified defensible space between structures and wildland areas.” The Project proposes a 56-foot buffer between the structures and wildland areas on the eastern side of the site with a 5-foot fire barrier wall to separate the two. This does not meet the buffer requirements of the draft SAP. The first 50 feet of defensible space around all structures is identified as a distinct brush management area (BMA) called BMA Zone 1. According to the MND, this zone will support ornamental plant species. Due to the reduced defensible space on the eastern side of the site, the Department recommends planting fire-resistant native shrubs in BMA Zone 1 as this area is directly adjacent to the Preserve System.
2. It is unclear in the documents where the off-site mitigation land will be, how the land will be protected and managed, and who will hold/manage the endowment or funding source. The MND should identify the exact location of the 3.32 acres of proposed mitigation habitat (include figure), an inventory of the resources within it, and explain the legal mechanism (e.g. conservation easement) that would be used to preserve and protect the habitat in perpetuity. Please note that the Department recommends that non-native grassland be mitigated ‘in-kind’ and should not be grouped with chaparral as a ‘Tier 3 habitat’ as would be allowed once the Santee SAP has been completed/permitted.
3. On page 82 of the MND, Mitigation Measure BIO-3 states that “a qualified biologist shall conduct a preconstruction nesting survey within the limits of disturbance” and that “this survey must occur no more than 10 days prior to any site activities.” The Department recommends preconstruction surveys not only within the limits of disturbance, but also within 300 feet of the area of disturbance, where feasible. This includes surveying into the surrounding CSS that is adjacent to the Project boundary. The Department also recommends that nesting surveys be conducted no more than three days prior to the initiation of project activities.
4. The SAP contains adjacency guidelines for minimizing direct and indirect impacts when building next to the Preserve System (Section 7.2.4.6 *Land Uses Adjacent to Preserves*). These include avoiding the introduction of invasive non-native plants into surrounding native habitat. None of the ornamentals in BMA Zone 1 should be invasive non-native plant species. BMA Zone 2 begins 50 feet from structures and extends to 100 feet toward the wildland. This zone ends adjacent to CSS. The Department recommends that the BMA Zone 2 contain more native cactus (e.g., coast prickly-pear (*Opuntia littoralis*), coast cholla (*Cylindropuntia prolifera*)), which would help dampen an approaching fire, and/or use a hydroseed mix containing native CSS shrub species such as California buckwheat (*Eriogonum fasciculatum*), and deerweed (*Acmispon glaber*). The native seed mix may be coordinated with the local fire authority to select shrub species with lower potential for fire.
5. Another adjacency guideline in the SAP is minimizing adverse effects on wildlife from lighting. Section 7.2.4.3 *Property Management – Lighting and Noise* in the SAP says that lighting adjacent to conserved habitat should be from a low-pressure sodium illumination source or something similar. The MND does not address what type of lighting will be used on the eastern side of the Project site that is adjacent to the Preserve System.

Mr. Michael Coyne
City of Santee
March 27, 2020
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Sincerely,



David A. Mayer
Acting Environmental Program Manager
South Coast Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento
Carol Roberts, U.S. Fish and Wildlife Service, Carlsbad

References:

Scheidt, V.N. 2018. A Biological Resources Survey Report for the Lantern Crest Phase 1A Ridge Addition, Santee, California. Prepared for Michael Grant. April 2017. Revised December 2017. Second Revision June 2018.

