



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer to:
FWS-16B0244-20CPA0166

July 13, 2020

Governor's Office of Planning & Research Sent Electronically

Mr. Chris Jacobs
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071

Jul 13 2020

STATE CLEARINGHOUSE

Subject: Comments on the Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California

Dear Mr. Jacobs:

The U.S. Fish and Wildlife Service (Service) has reviewed the above referenced Draft Revised Environmental Impact Report (Draft EIR) posted May 29, 2020, for the proposed Fanita Ranch Project (Project). Our comments are based on information provided in the Draft EIR, our knowledge of sensitive and declining natural communities in the region, multiple meetings with the City of Santee (City) and the Project applicant regarding preserve design, and our participation in the San Diego Multiple Species Conservation Program (MSCP). The Service has legal responsibility for threatened and endangered animals and plants occurring in the United States through the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans developed under section 10(a)(1)(B) of the Act such as the MSCP.

The Service has been working with the City on their draft Subarea Plan (SAP), which falls within the MSCP. We have provided the City and the Project applicant with extensive comments on the proposed Project, including a reconfiguration of preserve design to address key species (in letters dated September 16, 2016; December 20, 2016; May 14, 2018; and December 21, 2018, herein incorporated by reference, and in numerous meetings beginning in 2016); yet, as presented in the Draft EIR, the proposed Project has undergone little change since 2016. We remain concerned that the draft Santee SAP currently does not address covered species adequately, most specifically the Quino checkerspot butterfly (*Euphydryas editha quino*) and Hermes copper butterfly (*Lycaena hermes*), which were not covered in the MSCP. However, alternatives provided to the proposed Project in the Draft EIR include two that would significantly address our concerns: the Modified Development Footprint Alternative (shown in Figure 6-2) and the No Vineyard Village Reduced Project Footprint Alternative (shown in Figure 6-4). Both would: result in substantially reduced losses of habitats, reduce edge effects for these species in similar ways to our recommendations, and contribute significantly to conservation needed to meet issuance criteria for the Santee SAP.

Thank you for the opportunity to comment on the Project Draft EIR. By considering our comments and recommendations when preparing the Final Project EIR and revising the SAP, the City can greatly advance the habitat conservation plan permitting process. We remain committed to continue working with the City and the Project applicant to address the proposed Project under the City's SAP and ensure the resulting SAP will meet the issuance criteria for a section 10(a)(1)(B) permit under the Act. If you have any questions or comments regarding this letter, please contact [Carol Roberts](#)¹ at 760-431-9440, extension 271.

Sincerely,

Susan E. Wynn
Acting Assistant Field Supervisor

cc:
State Clearinghouse, Scott Morgan
HomeFed Fanita Rancho, LLC, Jeff O'Connor

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