

**FINDINGS OF CONFORMANCE
MULTIPLE SPECIES CONSERVATION PROGRAM
For Kemerko Minor Subdivision
TPM 20716 RPL¹, ER 03-14-002**

November 27, 2008

I. Introduction

The proposed project is a minor subdivision for a 94.1 acre property into four parcels and a remainder ranging in size from 5.1 to 38.2 acres. The site consists of three legal parcels (APN's 399-030-29, 30, and 399-040-11). Project development will involve the grading of an access road, building pads for 5 single-family residences, extension of utilities, and installation of onsite septic systems. The project site is located on the north side of Mountain View Road, west of Harbison Canyon between Ryan Ridge Road and Almyra Road.

The project location is situated in the middle of a MSCP Pre-Approved Mitigation Area linkage. The linkage runs southwest to northeast from the Sweetwater River area towards El Capitan Reservoir. The land remains largely undeveloped in the southern portion of the linkage. Along Mountain View Road and northward, development has occurred. To the west of the project, a temporary processing plant was developed after the 2003 wildfires to process construction debris and an L-grading permit is being processed to construct a road to access four legal parcels. The processing plant, TPM and grading permit projects span the entire width of the linkage.

Except for a utility transmission line and service road, the site is an undisturbed south facing slope that ranges in elevation from 1080 to 1520 feet. The site supports mafic southern mixed chaparral (12.9 acres), southern mixed chaparral (6.0 acres), coastal sage scrub (74.9 acres), and developed (0.3 acre). Four sensitive plant species, *Machaeranthera juncea*, *Viguiera laciniata*, *Selaginella cinerascans*, and *Quercus engelmanni* were observed onsite and one sensitive animal species, *Phrynosoma coronatum blainvelleri*. Forty-four sensitive plant species and thirty-four sensitive animal species occur within the project region but were not observed onsite.

Focused surveys were conducted for the Quino checkerspot butterfly in 2004 and 2007. Host plants, *Plantago erecta* and *Antirrhinum coulterianum*, were observed but no larvae adult butterflies. In 2003, the entire site and surrounding undeveloped land burned reducing the site's potential to support the butterfly. Surveys for the California gnatcatcher were not conducted because the site and surrounding area within two miles burned.

Project development will result in the following direct, indirect and cumulative impacts: 3.4 acres of mafic southern mixed chaparral, 0.9 acre of granitic southern mixed chaparral, 9.1 acres of coastal sage scrub, and 0.3 acre of developed lands. These impacts include the installation of a septic field on Parcel 2, which will be revegetated.

Impacts will also occur to Engelmann oaks and the San Diego sunflower. No impacts will occur to the ashy spike moss and Rush chaparral star. Mitigation will occur onsite. Onsite biological open space easement will preserve 9.2 acres of mafic southern mixed chaparral, 5.1 acres of southern mixed chaparral, and 65.0 acres of coastal sage scrub. Species impacts will be mitigated through habitat preservation. The open space shall also be protected by a 100-foot limited building zone, fencing, signs and a breeding season avoidance condition.

Table 1. Impacts to Habitat and Required Mitigation

| Habitat Type | Tier Level | Existing On-site (ac.) | Proposed Impacts (ac.) | Impact Neutral | Mitigation Ratio | Onsite Conservation (ac.) |
|-----------------------------------|------------|------------------------|------------------------|----------------|------------------|---------------------------|
| Mafic Southern Mixed Chaparral | I | 12.9 | 3.4 | 0.3 | 2:1 | 9.2 |
| Granitic Southern Mixed Chaparral | III | 6.0 | 0.9 | 0 | 1:1 | 5.1 |
| Diegan Coastal Scrub | SageII | 74.9 | 9.1 | 0.8 | 1.5:1 | 65.0 |
| Developed | IV | 0.3 | 0.3 | 0 | -- | 0 |
| Total: | -- | 94.1 | 13.7 | 1.1 | -- | 79.4 |

The findings contained within this document are based on County records, staff field site visits and the biology report prepared by RC Biological Consulting and dated **June 2008**. The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Game and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

The project site is a BRCA because the site is part of regional PAMA linkage and it supports sensitive soils, habitats and species.

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

Mitigation will occur onsite. Therefore, the mitigation site shall also be a BRCA. As a Biological Resource Core Area, the onsite open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan apply to this open space.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

1. Project development shall be sited in areas to minimize impact to habitat.

The project location was developed to reduce and avoid impacts to the PAMA linkage first and specific habitat impacts second. The development area is proposed adjacent to existing residential development along the property's southern boundary. Although impacts will occur to Tier I (mafic chaparral), Tier II (sage scrub), and Tier III (southern mixed chaparral) habitats, the project location will preserve a viable wildlife linkage and minimize overall biological impacts. As a result, approximately 84% of the site will be preserved in biological open space. Therefore, the project location will minimize habitat impacts.

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.

The project site has achieved clustering in accordance with the applicable zoning and general plan conformance by proposing development adjacent to an existing residential area. This location reduces impacts to the PAMA linkage and allows for the preservation of a viable linkage that will contribute to the preserve assembly.

3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.

Approximately 81% of the site has a slope >25%. Slope encroachment was not a primary factor in developing a project location to minimize biological impacts. Placing the development adjacent to an existing offsite residential area achieved more impact avoidance than slope encroachment would have. Therefore, slope encroachment would have resulted in additional impacts to the resources and PAMA linkage and was not used as an avoidance measure.

4. The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.

The proposed access road has been placed adjacent to the offsite residential area. This location minimizes and avoids biological resource impacts and meets the requirements for public safety. Further reductions in road standards would not result in further impact reductions and may result in public safety issues. Therefore, the project does not need to consider lessening road standards to minimize impacts to habitat.

5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).

The project is in conformance with Attachment G and H and the Subarea Plan.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. Acknowledge the “no net loss” of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies,

and standards, and implement applicable County ordinances with regard to wetland mitigation.

No wetland or jurisdictional resources occur onsite.

- 2. Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.**

The proposed open space includes a mosaic of habitat types – coastal sage scrub, mafic and granitic southern mixed chaparral, small gaps of disturbed areas along the utility line easement, and rock outcroppings. Preservation of these unique habitats and features maximizes the structural diversity of the open space.

- 3. Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.**

The majority of the site is mapped as very high habitat value with areas of low and medium value. The dominant habitat type is coastal sage scrub comprising almost 75 acres of the 94 acre site. Two additional chaparral habitats – mafic (12.9 acres) and granitic (6.0 acres) – comprise the remaining area of biological resources. An open space is proposed that will conserve approximately 84% of the site including 65.0 acres of sage scrub, 9.2 acres of mafic chaparral and 5.1 acres of granitic chaparral. Therefore, the project will preserve a significant block of coastal sage scrub and other high value habitat types.

- 4. Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.**

The proposed open space is 79.4 acres or 84% of the overall site. Edge effects and indirect impacts have been reduced through location of the development footprint adjacent to off-site residential areas and through conditions to require a 100-foot limited building zone between the development and open space, breeding season avoidance for migratory songbirds including the California gnatcatcher, and open space signs and fencing. The size of the open space and additional protective measures will reduce edge effects. In addition, the proposed open space is adjacent to the proposed preserve associated with the L-grading permit L14049 to the west. In conjunction with the adjacent project, a

102.3 acres open space will be created comprised of 72.8 acres of coastal sage scrub, 23.5 acres of mafic southern mixed chaparral, 5.1 acres of granitic southern mixed chaparral, 0.67 acres of southern coast live oak riparian forest and 0.09 acres of disturbed lands. Therefore, the project individually and in conjunction with L14049 will preserve a significant block of habitat with implemented measures to reduce edge effects.

5. Provide incentives for development in the least sensitive habitat areas.

The project location minimizes biological resource impacts and results in almost all impact mitigation being met onsite. Onsite mitigation reduces overall development costs and contributes to the assembly of the MSCP preserve system.

6. Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.

No narrow endemics were observed or are likely to occur onsite.

7. Preserve the biological integrity of linkages between BRCA's.

The proposed project is located on the eastern side of a PAMA linkage that runs from the southwest to the northeast from the Sweetwater River to the El Capitan Reservoir. The project proposes to preserve an open space that conserves approximately 84% of the site including 65 acres of sage scrub, 9.2 acres of mafic chaparral and 5.1 acres of granitic chaparral. This open space varies in dimension from Mountain View Road northward through the site. Beginning at Mountain View, the open space is approximately 700 feet wide, narrows to 450 feet wide before expanding outwards from 1,800 to 2,650 feet wide.

This project and the adjacent L14049 grading project have coordinated efforts to preserve more of the PAMA linkage. In addition to the dimensions discussed above, the total linkage will be preserved for ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. In addition to the proposed biological open space, the LBZ's provide a buffer between the wildlife linkage and the residential development. The LBZ will have clearing and thinning requirements but may still maintain a level of habitat integrity that adds to the overall linkage preservation. Therefore, the proposed project will contribute to the preservation of a viable regional PAMA linkage between BRCA's.

8. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

No covered or narrow endemic species were observed onsite. However, through preservation of 79.4 acres of habitat, the project will contribute to the

MSCP preserve assembly and therefore will contribute to achieving the conservation goals of covered species.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

TPM 20716 and L-14049 have coordinated conservation efforts to preserve the PAMA linkage. The linkage will be preserved for ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. In addition to the proposed biological open space, the LBZ's provide a buffer between the wildlife linkage and the residential development. The LBZ will have clearing and thinning requirements but may still maintain a level of habitat integrity that adds to the overall linkage preservation. Therefore, the proposed project will contribute to the preservation of a regional PAMA linkage.

2. Existing movement corridors within linkages will be identified and maintained.

The overall project site is a south facing slope that rises steeply on the northern half. Other than the northern portion of the site, which leads to an offsite ridgeline, no human defined local corridors are found on the project site. However, through preservation of 84% of the site, small movement routes unobserved during a site visits may be preserved.

3. Corridors with good vegetative and/or topographic cover will be protected.

The entire site burned in the 2003 wildfires. The pre-fire sage scrubs ranged from 0.5 to 1 meter in height and southern mixed chaparral was between 2 to 4 meters. With the return of these habitats, the site will again have good vegetation cover and the potential existing movement corridors discussed in finding C(2) will also be preserved.

4. Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.

The project spans the eastern side of a regional linkage that connects the Sweetwater River area with El Capitan Reservoir. This linkage should function as a major corridor for a wide range of large and small resident species. the

linkage will be preserved for ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. Therefore, the project will contribute to the overall preservation of a regional linkage that supports the dispersal and residence of many species.

- 5. The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.**

Examples of target species that could reasonably use this regional linkage include mountain lion, mule deer, ringtail, San Diego horned lizard and Southern grasshopper mouse. The large mobile species will require a bigger linkage width than the small species. The typical dimension cited is 1000 feet or greater but a smaller linkage over a short distance, such as 400 feet wide over a 500 foot distance, is suitable as well. With a south facing slope and historic vegetation cover, the project area has many elements that contribute to a good wildlife linkage. L-14049 and TPM 20716 have coordinated conservation efforts to preserve the linkage adjacent to Mountain View Road. The linkage will be preserved for ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. In addition to the proposed biological open space, the LBZ's provide a buffer between the wildlife linkage and the residential development. The LBZ will have clearing and thinning requirements but may still maintain a level of habitat integrity that adds to the overall linkage preservation. Therefore, the linkage will provide for continued movement of a range of species.

- 6. If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

Linkage preserve design has been coordinated between TPM 20716 and L14049. Between the two projects, the linkage will be preserved for ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. In addition to the proposed biological open space, the LBZ's provide a buffer between the wildlife linkage and the residential development. The LBZ will have clearing and thinning requirements

but may still maintain a level of habitat integrity that adds to the overall linkage preservation. As proposed, the preserved linkage would meet and exceed the minimum widths recommended for species dispersal.

- 7. Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

The site is a south facing slope that rises steeply on the northern half of the project area. The PAMA linkage crosses Mountain View Road continuing to the northeast up the slope towards an offsite ridgeline. The proposed preserve area will connect the offsite undeveloped land south of Mountain View with large areas of intact habitat to the north. Visual continuity will be maintained through the proposed open space because the topography lends itself towards long lines of sight even when the site is fully vegetated.

- 8. Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.**

The proposed open space will preserve a considerable amount (84%) of the site and the linkage preservation coordinated between TPM 20716 and L14049 has widths ranging from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward and then expanding to 1,850 - 2,100 feet from the limited building zone and extending north. An additional 100-foot LBZ on each side of the linkage adds another 200 feet of buffer between the residential development and the wildlife linkage. The linkage widths and LBZ will buffer and reduce human disturbance activities, which are primarily diurnal and take place outside of the activity time periods of most wildlife movement, which occur from dusk to dawn.

Additional measures such as fencing, open space signs and breeding season avoidance will further reduce indirect activities and disturbance. In addition, the project is located within Zone B as identified by the San Diego County Light Pollution Code. It will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, the project will implement and be required to comply with measures to reduce human disturbance activities on the linkage.

- 9. Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.**

Project development will involve the grading and construction of five residential pads, utilities and an access road. This road is located adjacent to the off-site residential area to minimize impacts on the biological resources and PAMA linkage. The road will not cross a corridor. Therefore, the road will not be a barrier to wildlife movement.

- 10. Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.**

No crossings are proposed over or through any topographic feature that is a wildlife crossing and would require a bridge, tunnel or box culvert.

- 11. If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.**

The project site is located within a regional PAMA linkage that connects the Sweetwater River area to El Capitan. Movement through the linkage shall be maintained with proposed open space coordinated between the current project and the adjacent L14049. Therefore, the project will be part of a continuous regional linkage and local corridor without the use of an archipelago type system.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

- 1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.**

No wetlands as defined by the ACOE, CDFG or County of San Diego will be impacted.

2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.

The proposed open space includes a mosaic of habitat types – coastal sage scrub, mafic and granitic southern mixed chaparral, small gaps of disturbed areas along the utility line easement, and rock outcroppings. Preservation of these unique habitats and features maximizes the structural diversity of the open space.

3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.

The majority of the site is mapped as very high habitat value with areas of low and medium value. The dominant habitat type is coastal sage scrub comprising almost 79.4 acres of the 94.1 acre site. Two additional chaparral habitats – mafic (12.9 acres) and granitic (6.0 acres) – comprise the remaining area of biological resources. An open space is proposed that will conserve approximately 84% of the site including 65.0 acres of sage scrub, 9.2 acres of mafic chaparral and 5.1 acres of granitic chaparral. Therefore, the project will preserve a significant block of coastal sage scrub and other high value habitat types.

4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

The proposed open space is 79.4 acres or 84% of the overall site. Edge effects and indirect impacts have been reduced through location of the development footprint adjacent to offsite residential areas and through conditions to require a 100-foot limited building zone between the development and open space, breeding season avoidance for migratory songbirds including the California gnatcatcher, and open space signs and fencing. The size of the open space and additional protective measures will reduce edge effects. In addition, the proposed open space is adjacent to the proposed preserve associated with the L-grading permit L14049 to the west. In conjunction with the adjacent project, a 102.3 acres open space will be created comprised of 72.8 acres of coastal sage scrub, 23.5 acres of mafic southern mixed chaparral, 5.1 acres of granitic southern mixed chaparral, 0.67 acres of southern coast live oak riparian forest and 0.09 acres of disturbed lands. Therefore, the project individually and in conjunction with L14049 will preserve a significant block of habitat with implemented measures to reduce edge effects.

5. The project provides for the development of the least sensitive habitat areas.

The project location minimizes biological resource impacts and results in all impact mitigation being met onsite. Onsite mitigation reduces overall development costs and contributes to the assembly of the MSCP preserve system.

- 6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.**

No covered or narrow endemic species were observed on-site. However, through preservation of 79.4 acres of habitat, the project will contribute to the MSCP preserve assembly and therefore will contribute to achieving the conservation goals of covered species.

- 7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.**

The project spans the eastern side of a regional linkage that connects the Sweetwater River area with El Capitan Reservoir. This linkage should function as a major corridor for a wide range of large and small resident species. The proposed open space spans nearly half the width of the PAMA linkage for a distance of 2000 feet out of 3800 feet. Therefore, the project will contribute to the overall preservation of a regional linkage that supports the dispersal and residence of many species.

- 8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

No covered or narrow endemic species were observed or are likely to occur onsite.

- 9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.**

The proposed project is located on the eastern side of a PAMA linkage that runs from the southwest to the northeast from the Sweetwater River to the El Capitan Reservoir. The project proposes to preserve an open space that conserves approximately 84% of the site including 65.0 acres of sage scrub, 9.2 acres of mafic chaparral and 5.1 acres of granitic chaparral. This open space varies in dimension from Mountain View Road northward through the site. Beginning at Mountain View, the open space is approximately 700 feet wide, narrows to 450 feet wide before expanding outwards from 1,800 to 2,650 feet wide.

This project and the adjacent L14049 grading project have coordinated efforts to preserve more of the PAMA linkage. In addition to the dimensions discussed above, the total linkage preserved will range from 350 – 1,100 feet over a distance of 700 feet from Mountain View northward. The proposed open space will then span almost the entire PAMA linkage for a distance of 2900-3600 feet. In addition

to the proposed biological open space, the LBZ's provide a buffer between the wildlife linkage and the residential development. The LBZ will have clearing and thinning requirements but may still maintain a level of habitat integrity that adds to the overall linkage preservation. Therefore, the proposed project will contribute to the preservation of a viable regional PAMA linkage between BRCA's.

10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.

The proposed open space is 79.4 acres or 84% of the overall site. Edge effects and indirect impacts have been reduced through location of the development footprint adjacent to offsite residential areas and through conditions to require a 100-foot limited building zone between the development and open space, breeding season avoidance for migratory songbirds including the California gnatcatcher, and open space signs and fencing. The size of the open space and additional protective measures will reduce edge effects. In addition, the proposed open space is adjacent to the proposed preserve associated with the L-grading permit L14049 to the west. In conjunction with the adjacent project, a 102.3 acres open space will be created comprised of 72.8 acres of coastal sage scrub, 23.5 acres of mafic southern mixed chaparral, 5.1 acres of granitic southern mixed chaparral, 0.67 acres of southern coast live oak riparian forest and 0.09 acres of disturbed lands. Therefore, the project individually and in conjunction with L14049 will preserve a significant block of habitat with implemented measures to reduce edge effects.

11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.

The project site is a BRCA within a key regional PAMA linkage. Project development has been located adjacent to existing residential development along the southern portion of the site to reduce and minimized impacts to the PAMA linkage and biological resources. The end result is the preservation of 84% of the site in open space with conditions to reduce edge effects and indirect impacts. Sensitive species observed onsite are not MSCP covered species or narrow endemics. However, proposed impacts to these species will be off-set through the onsite preservation of habitats. In addition, through preservation planning efforts with the adjacent L14049, a 100+ acre open space area will be created. Individually and in conjunction with L14049, TPM 20716 will contribute to the assembly of the MSCP preserve and has made every effort to reduce and avoid impacts to a BRCA and sensitive species and habitats.

MSCP Designation For Kemerko Minor Subdivision TPM 20716, ER 03-14-002

