

**MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT**  
**For Rancho Sierra Tentative Map**  
**PDS2015-TM-5601, PDS2015-ER-15-14-004**  
**APN 404-430-45**

**March 8, 2018**

**I. Introduction**

The project is a Tentative Map to subdivide approximately 11.52 acres into 10 residential lots. The project site is located south of Alpine Boulevard along South Grade Road in the Alpine Community Plan Area.

The project site is subject to the Village General Plan Regional Category and Village Residential (VR-2.9) Land Use Designation. Zoning for the site is A70, Limited Agricultural. Access to the site would be provided by a new private road connecting to South Grade Road. Water service would be provided by Padre Dam Municipal Water District and individual on-site wastewater systems (supplemental treatment systems). Earthwork will consist of the 7,500 cubic yards of balanced cut and fill.

The project site contains four habitat types as detailed in Table 1 below. Sensitive wildlife species identified on-site include western whiptail, San Diego desert woodrat, cooper's hawk, costa's hummingbird, nuttall's woodpecker, western bluebird and Lawrence's goldfinch. Sensitive plant species identified on-site include Engelmann oak.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Onsite Impacts (ac.)	Proposed Offsite Impacts (ac.)	Mitigation Ratio	Required Mitigation
Open Engelmann Oak Woodland	I	0.54	0.54	0.04	2:1	0.95 (0.25 acres previously purchased)
Coastal Sage-Chaparral Scrub	II	8.54	8.54	0.92	1.5:1	14.4 (0.2 acre containing Hermes habitat)
Disturbed	IV	2.18	2.18	0.34	--	--
Urban/Developed	IV	0.44	0.44	--	--	--
<b>Total:</b>	--	11.7	11.7	1.3	--	15.35

The findings contained within this document are based on County records, staff field site visits and the Biological Resources Letter Report prepared by Cummings & Associates and dated December 2017. 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 Wildlife 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 qualifies as a BRCA as it is located in a Pre-Approved Mitigation Area (PAMA).

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

The project is conditioned to provide offsite mitigation which qualifies as a BRCA. The project is pre-approved to mitigate its impacts on a portion of APN 404-170-04 which is located adjacent to Wrights Field which qualifies as a BRCA.

## **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.**

Based on an evaluation of the project site and surrounding development, it was determined that, although the site is designated as PAMA, it is not desirable for preservation. Since the adoption of the MSCP, existing legal lots to the southwest

of the project site have been built out with single family homes. With the exception of an approximately 150 foot wide strip of habitat located to the east of the habitat on the project site, it maintains no connectivity to adjacent habitat within PAMA and Wrights Field. Based on this evaluation, it was determined that with appropriately sited mitigation, it is appropriate for the habitat on the project site to be impacted. The project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field.

Therefore, since development of the project site has been determined to be appropriate, minimization of impacts to habitat thorough development siting is not required.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Therefore, clustering onsite is not necessary to achieve avoidance.

**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.**

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Therefore, slope encroachment is not necessary to avoid habitat impacts.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Therefore, reductions in road standards are not necessary to reduce impacts.

**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).**

Findings in accordance with Attachment G (preserve Design Criteria) are provided below. The project will not impact linkages or corridors. Project Design Criteria for linkages and corridors, included in Attachment H (Design Criteria for Linkages and Corridors), is not required.

## **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.**

The project site does not contain wetlands.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Nonetheless, the project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This conserved habitat will contribute to the existing preserved Wrights Field which contains unique habitat and habitat features.

- 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 project site contains coastal sage-chaparral scrub and open Engelmann oak woodland which are ranked as having low, moderate and high value by the MSCP habitat evaluation model. As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. The project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. The mitigation site contains Diegan coastal sage scrub and native grassland which are ranked as having very high value by the MSCP habitat evaluation model. Therefore, the project will conserve coastal sage scrub that is ranked as having very high biological value.

- 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.**

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Nonetheless, the project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This mitigation site contributes to the creation of a large block of habitat through the addition of over 15 acres to the over 230 acre Wrights Field preserve. The project will be required to provide evidence that the 15 acres has been added to the Land Management Plan for Wrights Field to ensure that management will be implemented and will be required to provide funding for this management.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Therefore, incentives for developing the least sensitive habitat areas are not necessary.

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

The project site does not contain any narrow endemic species and therefore, will not result in any impacts to narrow endemic species.

**7. Preserve the biological integrity of linkages between BRCAs.**

As discussed in Section III.A.1. above, since the adoption of the MSCP, existing legal lots to the southwest of the project site have been built out with single family homes. With the exception of an approximately 150 foot wide strip of habitat located to the east of the habitat on the project site maintains no connectivity to adjacent habitat within PAMA and Wrights Field. The project will preserve the biological integrity of the BRCA by conserving a portion of APN 404-170-4 which is located immediately adjacent to Wrights Field, a BRCA.

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

Cooper's hawk (*Accipiter cooperi*) and Western bluebird (*Sialia mexicana*) are included in Table 3-5 and were observed on the project site. The proposed mitigation for the project will contribute to the conservation goals for these species through the preservation of foraging habitat. In addition, the project will avoid the bird breeding season which occurs from February 15<sup>th</sup> through August 31<sup>st</sup>. Through the implementation of project mitigation the project will achieve the conservation goals for covered species and habitats.

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

The project will not impact linkages or corridors. Project Design Criteria for linkages and corridors, included in Attachment H, is not required.

### **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.**

The project site does not contain wetlands and therefore will not conflict with the no-net-loss-of-wetlands standard.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Nonetheless, the project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This conserved habitat will contribute to the existing preserved Wrights Field which contains unique habitat and habitat features.

**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 project site contains coastal sage-chaparral scrub and open Engelmann oak woodland which are ranked as having low, moderate and high value by the MSCP habitat evaluation model. As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. The project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. The mitigation site contains Diegan coastal sage scrub and native grassland which are ranked as having very high value by the MSCP habitat evaluation model. Therefore, the project will conserve coastal sage scrub that is ranked as having very high biological value.

**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 project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This mitigation site contributes

to the creation of a large block of habitat through the addition of over 15 acres located adjacent to the over 230 acre Wrights Field preserve. Through the siting of the mitigation, the edge effects will be minimized and the ratio of surface area to the perimeter of conserved habitats will be maximized.

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

As discussed in Section III.A.1. above, development of the project site has been determined to be appropriate. Therefore, incentives for developing the least sensitive habitat areas are not necessary.

**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 threatened, endangered, or narrow endemic species were detected on the project site. Seven sensitive wildlife species and one sensitive plant species were observed onsite: Western Whiptail (*Aspidoscelis tigris stejnegeri*), San Diego Desert Woodrat (*Neotoma lepida intermedia*), Cooper's Hawk (*Accipiter cooperi*), Western Bluebird (*Sialia mexicana*), Lawrence's Goldfinch (*Spinus lawrencei*), Nuttall's Woodpecker (*Picoides nuttallii*), Costa's Hummingbird (*Calypte costae*) and Engelmann Oak (*Quercus engelmannii*). Surveys conducted for Hermes Copper and Quino Checkerspot Butterfly were both negative. Developing the site will not impact key populations of covered species, as the site does not support them. The project proposes to mitigate its impacts on a portion of APN 404-170-4 which is located adjacent to Wrights Field which is known to host a high number of sensitive plant and wildlife 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 proposes to mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This mitigation site contributes to the creation of a large block of habitat through the addition of over 15 acres located adjacent to the over 230 acre Wrights Field preserve. The proposed mitigation will contribute to the preservation of Golden eagles as they are known to forage in Wright's Field.

**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.**

The project site does not contain any narrow endemic species and therefore, will not result in any impacts to narrow endemic species.

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

This project will not jeopardize the assemblage of a preserve area. Based on an evaluation of the project site and surrounding development, it was determined that, although the site is designated as PAMA, it is not desirable for preservation. Since the adoption of the MSCP, existing legal lots to the southwest of the project site have been built out with single family homes and precluded connectivity of the site to other large blocks of habitat. The project does, however, offer mitigation on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field. This mitigation will contribute to the overall value of and size of Wright's Field and the assembly of that preserve.

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

The project does not include onsite preservation.

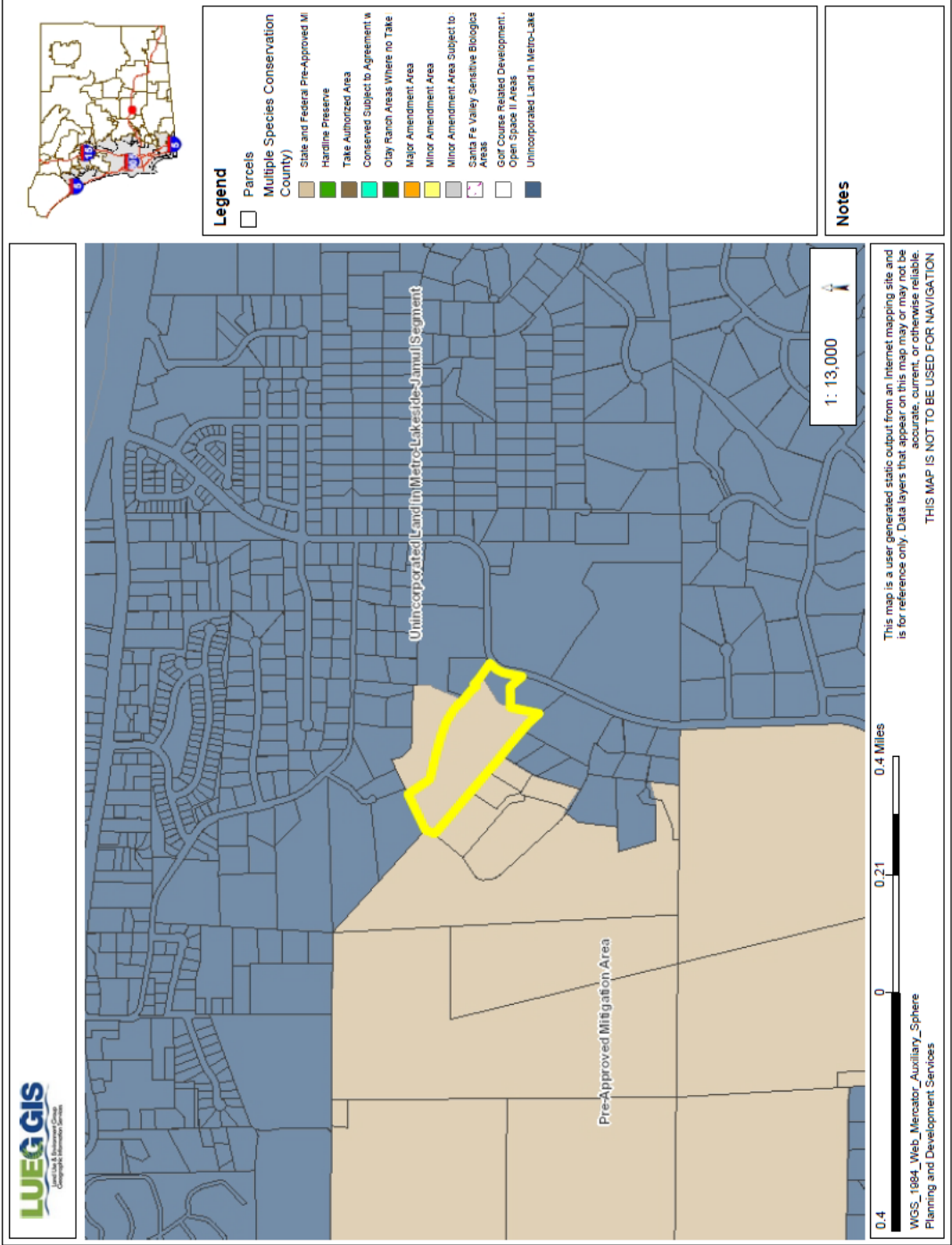
**11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

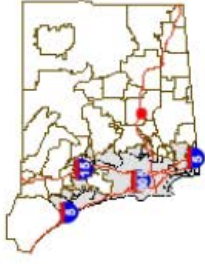
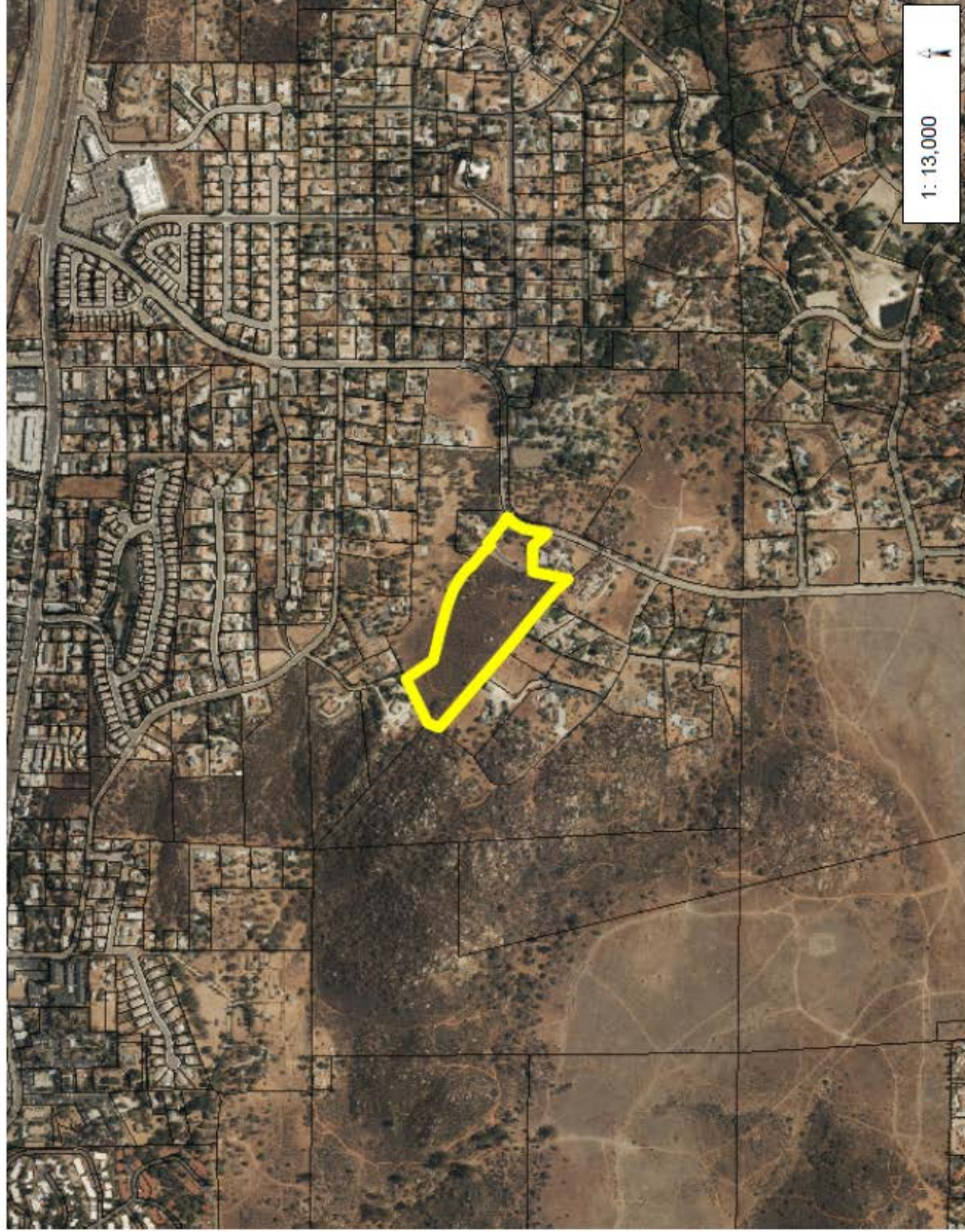
Although the site is designated as PAMA, and therefore is a BRCA, based on an evaluation of the site it has been determined that it is not desirable for preservation. Since the adoption of the MSCP, existing legal lots to the southwest of the project site have been built out with single family homes and precluded connectivity of the site to other large blocks of habitat. There were no threatened, endangered or narrow endemic species detected onsite during biological surveys and no significant populations of sensitive species are expected to reside on the property. Surveys conducted for Hermes Copper and Quino Checkerspot Butterfly were both negative. The project will mitigate its impacts on a portion of APN 404-170-4 which is located within PAMA and adjacent to Wrights Field which is known to host a high number of sensitive plant and wildlife species. This mitigation will contribute to the overall value of and size of Wright's Field and the assembly of that preserve.

Ashley Smith, Planning & Development Services  
March 8, 2018



MSCP Designation For  
Rancho Sierra Tentative Map  
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**Legend**

- ☐ Parcels

**Notes**

0.4 0.21 0.4 Miles  
 This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.  
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