February 15, 2018

Ms. Rita Brandin
Senior Vice President
Newland Communities
4790 Eastgate Mall, Suite 150
San Diego, CA 92121

Re: Hardline Projects in MSCP and MHCP Subarea Plans

Dear Ms. Brandin:

This letter is in response to your request for documentation on the number of properties that were included as “hardline” development and preserve areas (“hardline projects”) and included as “covered projects” in draft Multiple Species Conservation Program (MSCP) Subarea Plans and draft Multiple Habitat Conservation Program (MHCP) Subarea Plans in San Diego County.

I prepared this letter response and the attached table in my capacity as President of J. Whalen Associates, Inc., and as a subject matter expert on MSCP matters for more than 25 years. And to clarify, I am not a CEQA consultant; and, therefore, the County’s CEQA Consultant List is not applicable to my letter response in my above-described capacity.

Starting in the early 1990’s, several landscape-level Subarea Plans have been developed and implemented in San Diego County, including the City of San Diego MSCP Subarea Plan, the County of San Diego MSCP Subarea Plan, the City of Chula Vista MSCP Subarea Plan, and the City of Carlsbad Habitat Management Plan (HMP), a Subarea Plan of the Multiple Habitat Conservation Program (MHCP) Plan.

Attached is a table listing 65 hardline projects that have been included as covered projects in these Plans, including both plans that are now approved and plans that are still in process (draft).

MSCP and MHCP Subarea Plans are crafted under the auspices of the State of California Natural Communities Conservation Planning (NCCP) Act of 1993 and Section 10(a) of the Federal Endangered Species Act. There is an established history for the inclusion of hardline projects in draft Subarea Plans in San Diego, Orange, and Riverside counties spanning a timeframe beginning in the early 1990’s until the present, with draft Subarea Plans for North San Diego County and the City of Santee in active plan development.
From the date of the enactment of the original NCCP Act of 1993 and the continuum of practice since then, jurisdictions that enrolled in the NCCP and landowners who voluntarily participated as hardline projects catalyzed the creation of the first multiple species/multiple habitat preserves.

Since 1997, tens of thousands of acres of the most diverse habitat in the continental United States have been permanently preserved through hardline projects. Hardline projects then and today provide assurances to landowner, agency, and environmental stakeholders by establishing development and preserve boundaries upon which development rights can be relied and larger, contiguous, functional habitat preserves can be created.

By increasing the likelihood that preserves would be assembled as planned, and at the same time assuring landowners that they could count on the durability of the hardline boundaries over time, a careful balance was struck that led to the largest wildlife preserves in the country in areas experiencing significant population and economic growth. Hardline projects were foundational to this outcome; without them, many of the plans would not have materialized.

The attached compendium includes hardline projects for the Cities of Carlsbad, San Diego, Chula Vista, and Santee, as well as unincorporated areas of San Diego County (Lake Hodges, Metro-Lakeside-Jamul, and South County Segments), including Subarea Plans in process (draft) as well as those Subarea Plans that are now approved and being implemented.

Please let me know if you have any questions.

Sincerely,

J. Whalen Associates, Inc.
A California corporation

[Signature]

by: James E. Whalen
President

Attachment: MSCP & MHCP Covered Hardline Projects
MSCP & MHCP COVERED (HARDLINE) PROJECTS

APPROVED SUBAREA PLANS*

- Carlsbad
  - HMP Revised Proposed Hardline Conservation Areas
  - City Golf Course
  - Bressi Ranch
  - Carlsbad Oaks North
  - Holly Springs
  - Kelly Hillman
  - South Coast
  - Raceway
  - Manzanita Partners
  - Veterans Memorial Park
  - Hub Park & SDG&E
  - Lake Calavera
  - Zone 39 Park
  - Hieatt
  - Fox-Miller
  - Cantarini
  - Kevane
  - Summit at Carlsbad
  - Mandana
  - Aura Circle
  - Roesch
  - Promenade
  - Redeemer
  - Thompson - Tabata

- Chula Vista
  - Figure 1 Hardline Map
  - Rolling Hills Ranch (Salt Creek Ranch)
  - San Miguel Ranch
  - Bella Lago
  - Otay Ranch
  - University Site

- San Diego
  - Ocean View Hills
  - Otay Corporate Center
  - Carmel Valley Neighborhood 8
  - Carmel Valley Neighborhood 8A
  - Carmel Valley Neighborhood 10
  - Black Mountain Ranch
  - Pacific Highlands Ranch
  - Sycamore Estates
  - Del Mar Mesa

- County of San Diego (South Subregion)
  - Helix Lambron, Alpine, Lakeside Downs, Lakeside Ranch
  - Helix Del Dios
  - 4S Ranch
  - Santa Fe Valley
  - Otay Ranch Villages 13/14, Planning Areas 16, 17, & 19

DRAFT/NOT YET APPROVED SUBAREA PLANS

- Santee (Fanita Ranch)
  - Santee Subarea Plan 1998
  - Santee Subarea Plan 2008-2009

- County of San Diego (North Subregion)
  - Hardline Map
  - Hardline Projects

* All the projects listed were originally included as hardline projects in the draft version of these plans.
Figure 6 - Revised Proposed Hardline Conservation Areas

Previously included in Addendum No. 2
Figure 34
Summit at Carlsbad Property
Previously included in Addendum No. 2
Figure 35
Mandana Property
Previously included in Addendum No. 2
Figure 36
Aura Circle

Previously included in Addendum No. 2

Map created 24 November 2004 - https://gis1.carlsbad.ca.us/arcgis/rest/services/PLANS/PL_2017_02/MapServer/0
Figure 37
Roesch

Previously included in Addendum No. 2
Figure 38
Promenade
Previously included in Addendum No. 2
Figure 39
Redeemer by The Sea
Previously included in Addendum No. 2
Figure 40
Thompson - Tabata

Previously included in Addendum No. 2
Legend

- Project Boundary
- Spring 2000 Survey Boundary
- Proctor Valley Road Easement
- Lot Lines

- Preserve
- Tarpaint Management Areas
- Neutral Open Space Areas
- Development Areas

Rolling Hills Ranch

FIGURE 7-2
Conserved Vegetation Communities in Santee Subarea Plan
Santee Subarea Preserve

- Newly Conserved 100 Percent
- Newly Conserved 75 Percent
- Newly Conserved 50 Percent
- Existing Conserved Newly Managed 100 Percent

Other Preserve Areas:
- Existing Conserved and Managed (Baseline Conservation)

Outside Preserve
- Natural Vegetation within Santee Study Area Not Conserved

Basemap Legend:
- Subarea Boundary
- Not a Part (Part of Dam-MWD NCP Subarea)
- Natural Vegetation/Disturbed Agriculture
- Developed
- Habitat Linkage/Wildlife Corridor
- Great Escape Trail Linkage

Santee Subarea Plan Preserve Areas
Figure 1. Development footprint for Campus Park, Meadowood, and Campus Park West projects.
Figure 2. Proposed hard-line development plan for Cielo del Norte.

Hardline Projects
Cielo del Norte

Parcels
Baseline Preserve
Open Space Easements
Hardline Gains
Takes Authorized

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Figure 5. Development footprint for Lilac Ranch project.
Figure 6. Development footprint for Merriam Mountains project.
Figure 7. Development footprint for Montecito Ranch project.
Figure 8. Development footprint for Warner Ranch project.

This project footprint has changed—new maps should be obtained from the project applicant.

Note: Project includes improvements to Highway 76, shown on the map. The hardline project shown on the west end of the map above is Campus Park and Meadowood, which are separate from the Warner Ranch project.
Figure 9. Development footprint for McClellan-Palomar Airport improvements.
Figure 10. Take-authorized area for San Marcos Landfill, where limited take is authorized by this Plan.
Figure 11. Take-authorized areas on Gusjome Regional Park and baseline preserve areas on Gusjome Adobe Park.