

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.

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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.

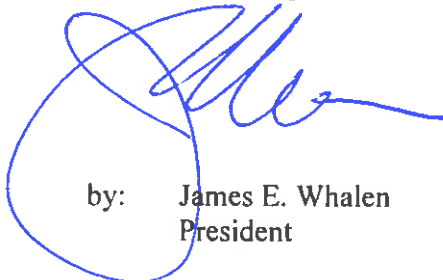
By increasing the likelihood that preserves would be assembled as planned, and at the same time assuring landowners that they could count on the durability of the hardline boundaries over time, a careful balance was struck that led to the largest wildlife preserves in the country in areas experiencing 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



by: James E. Whalen
President

Attachment: MSCP & MHCP Covered Hardline Projects

MSCP & MHCP COVERED (HARDLINE) PROJECTS

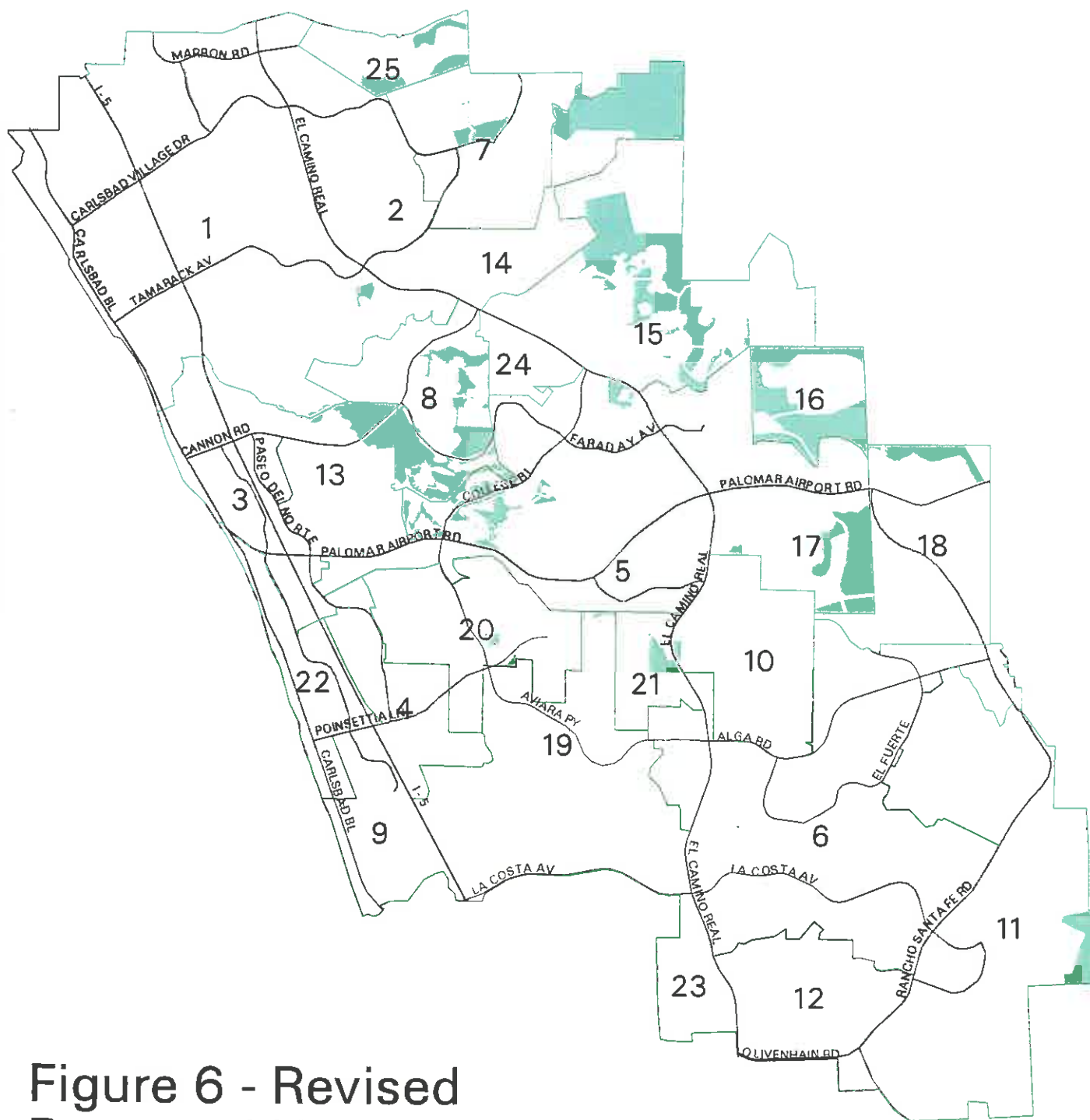
APPROVED SUBAREA PLANS*

- 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 19 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](#)
 - [45 Ranch](#)
 - [Santa Fe Valley](#)
 - [Otay Ranch Villages 13/14, Planning Areas 16, 17, & 19](#)

DRAFT/NOT YET APPROVED SUBAREA PLANS

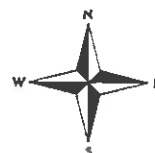
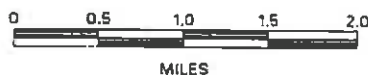
- Santee (Fanita Ranch)
 - [Santee Subarea Plan 1998](#)
 - [Santee Subarea Plan 2008-2009](#)
- County of San Diego (North Subregion)
 - [Hardline Map](#)
 - [Hardline Projects](#)

* 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



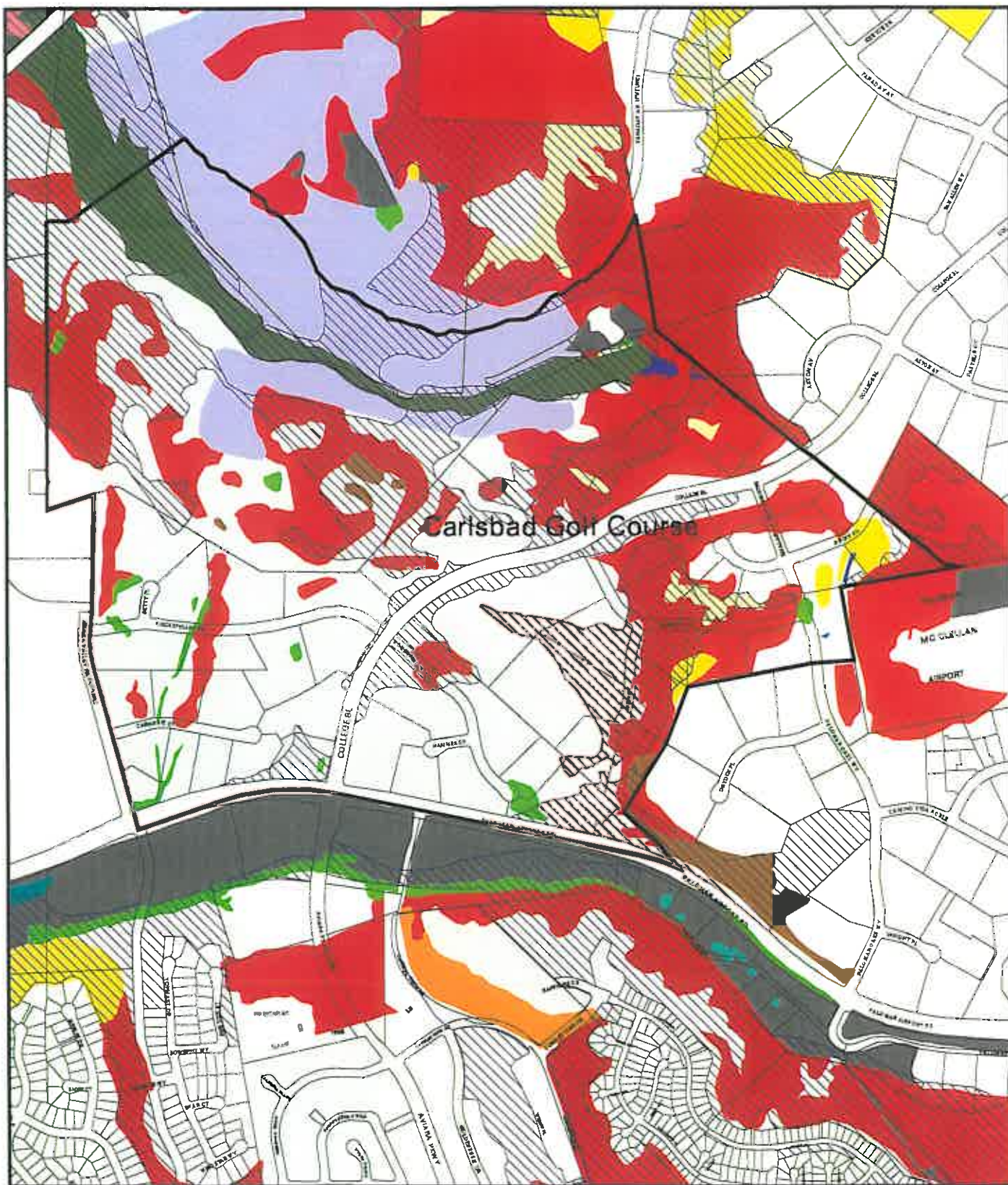


Figure 8
City Golf Course



300 100 0 200 400
FEET

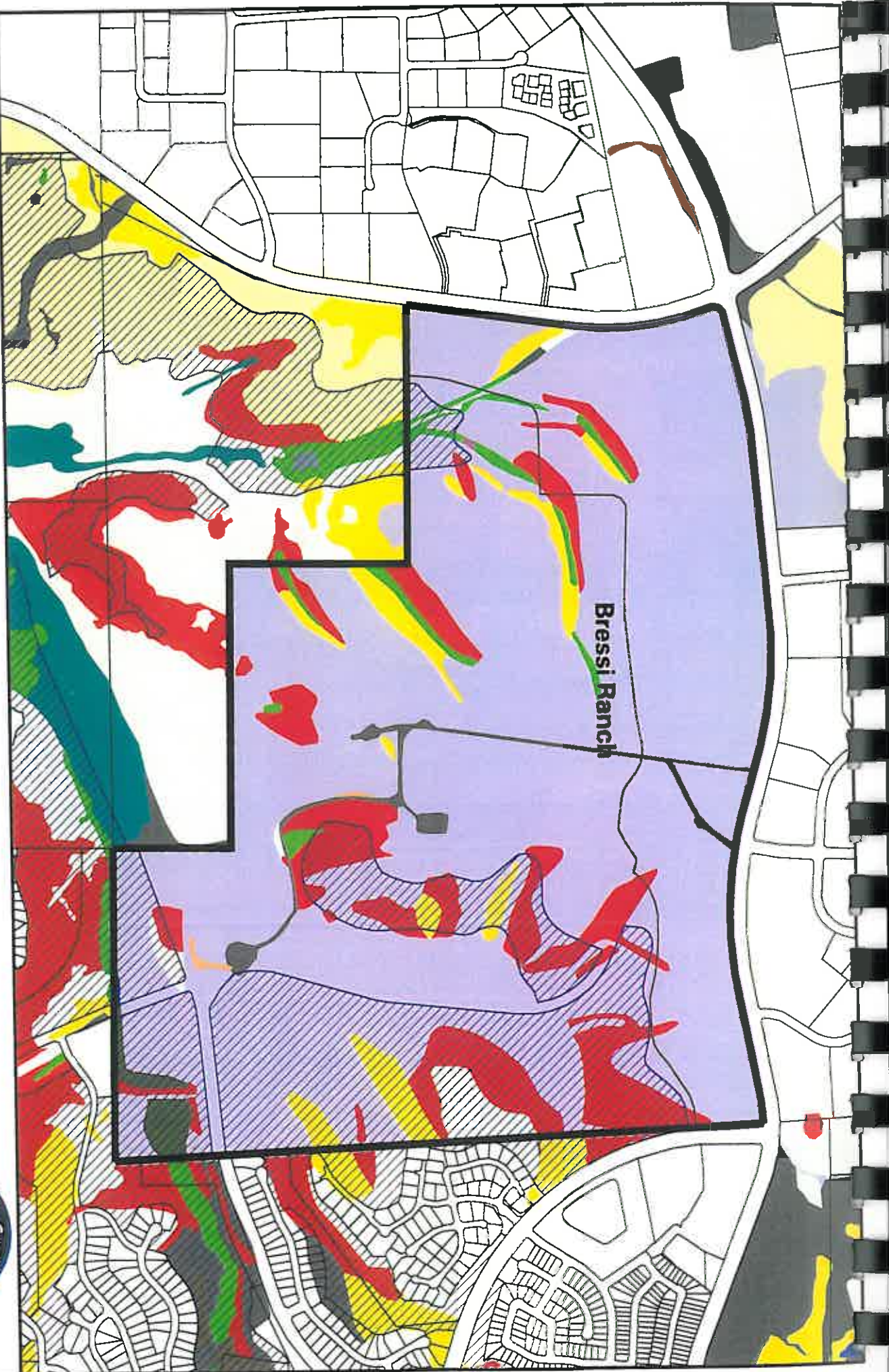


Figure 9
Bressi Ranch



FEET



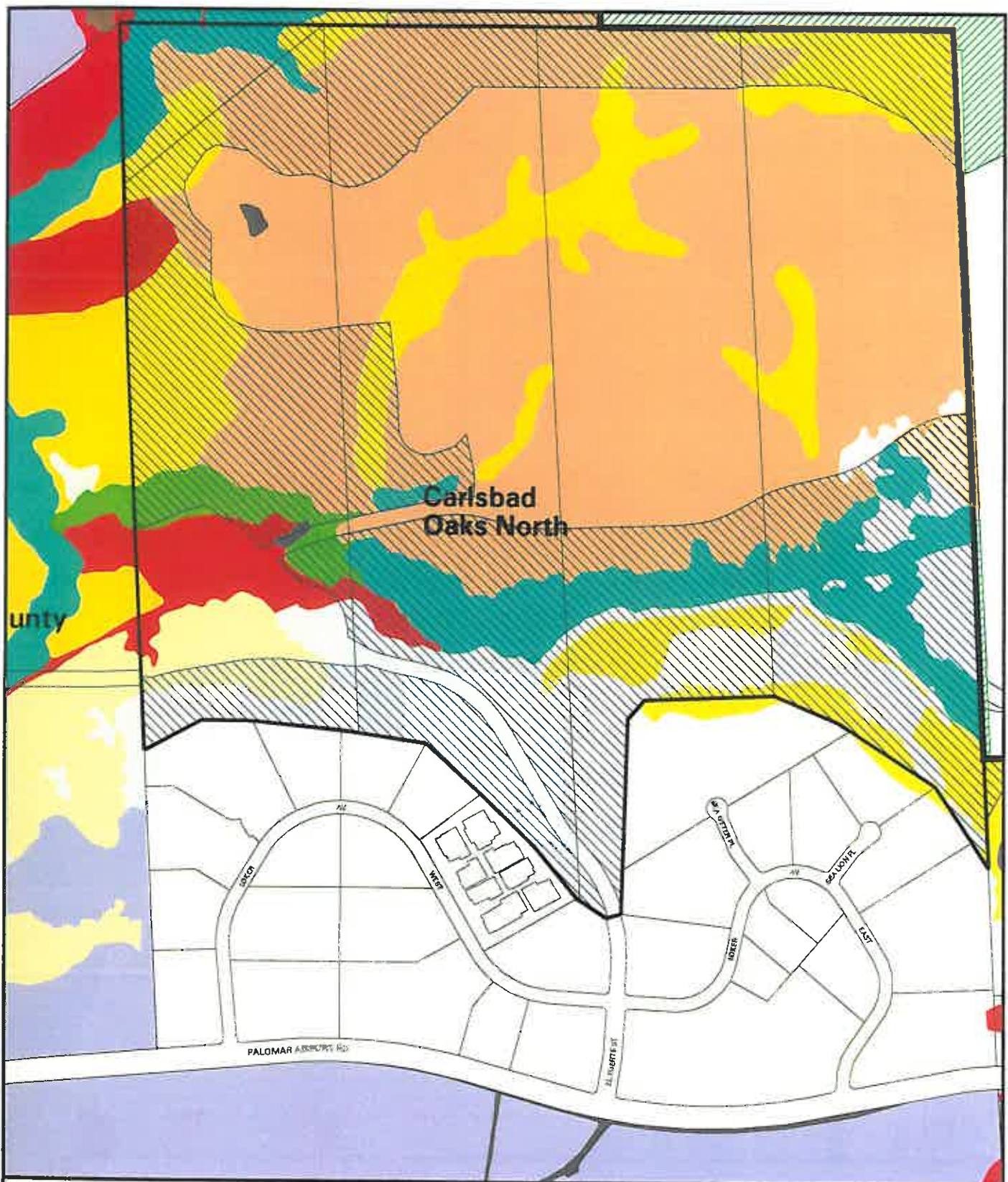


Figure 10
Carlsbad Oaks North





Figure 11
Holly Springs



Standards Area



**Figure 12 - Revised
Kelly Hillman Property**

Previously included in Addendum No. 2

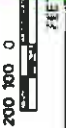
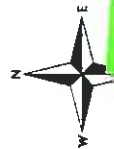
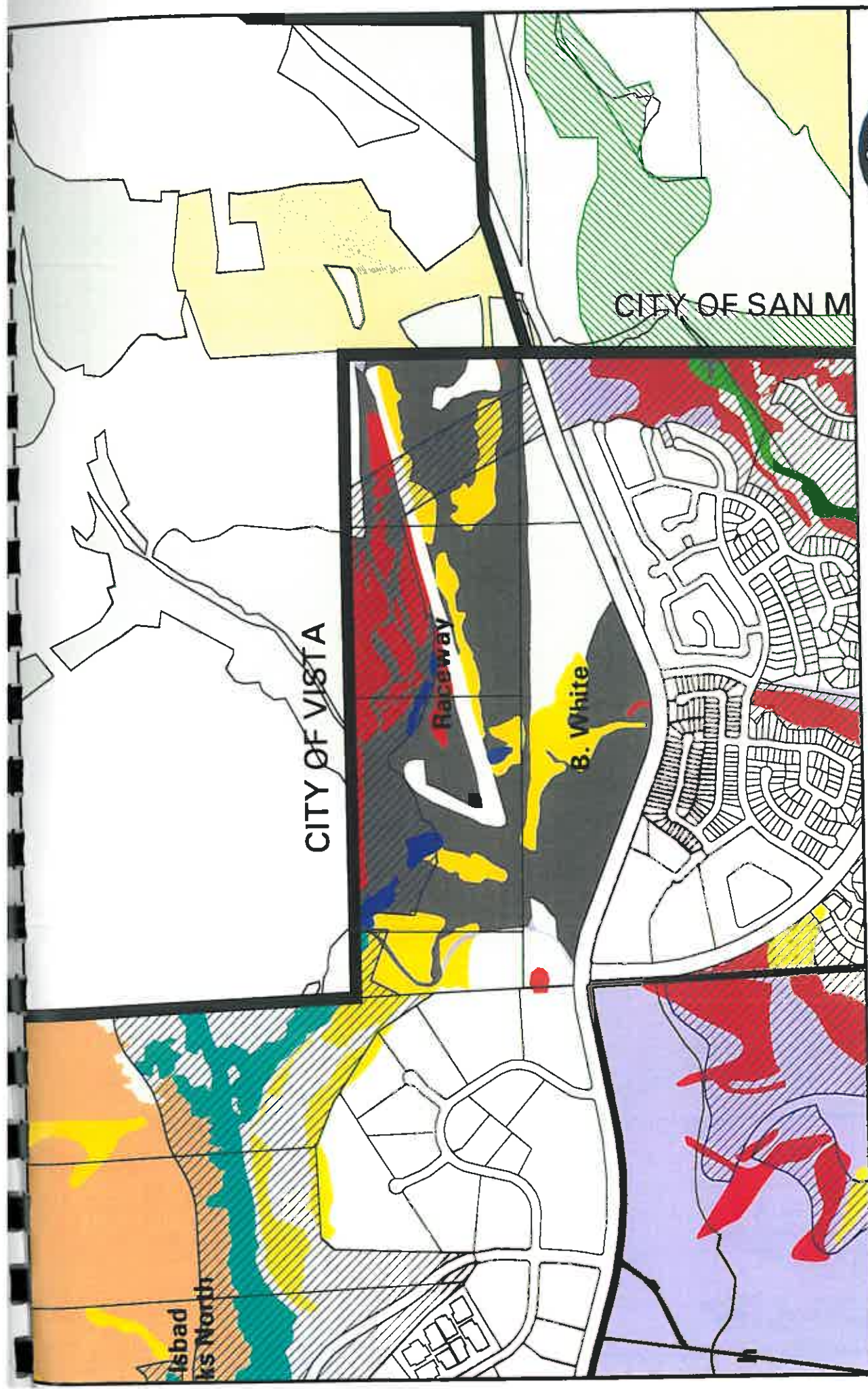


Figure 13
South Coast



**Figure 14
Raceway**

11/24/98

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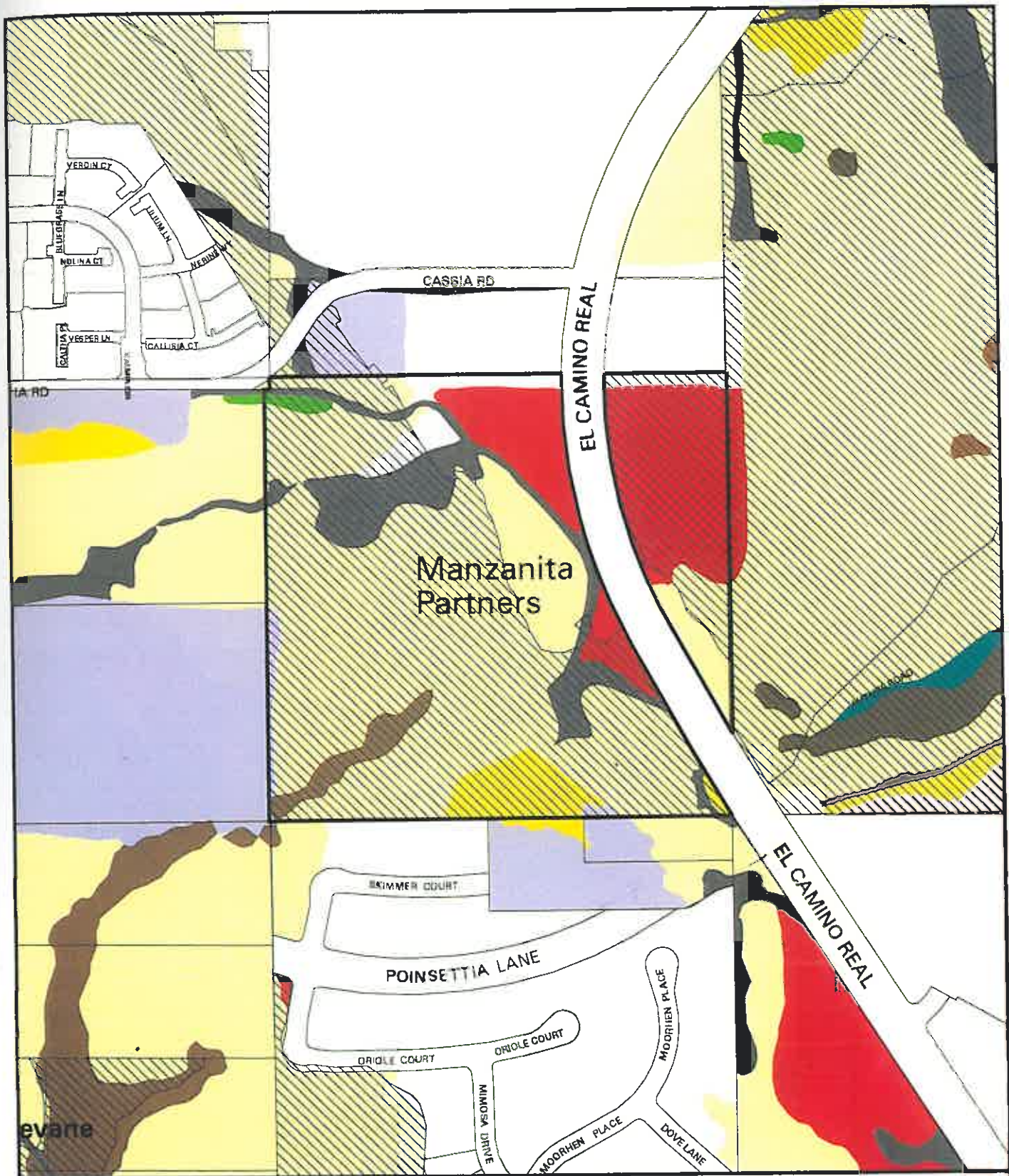


Figure 15
Manzanita Partners



200 100 0 200 400



FEET



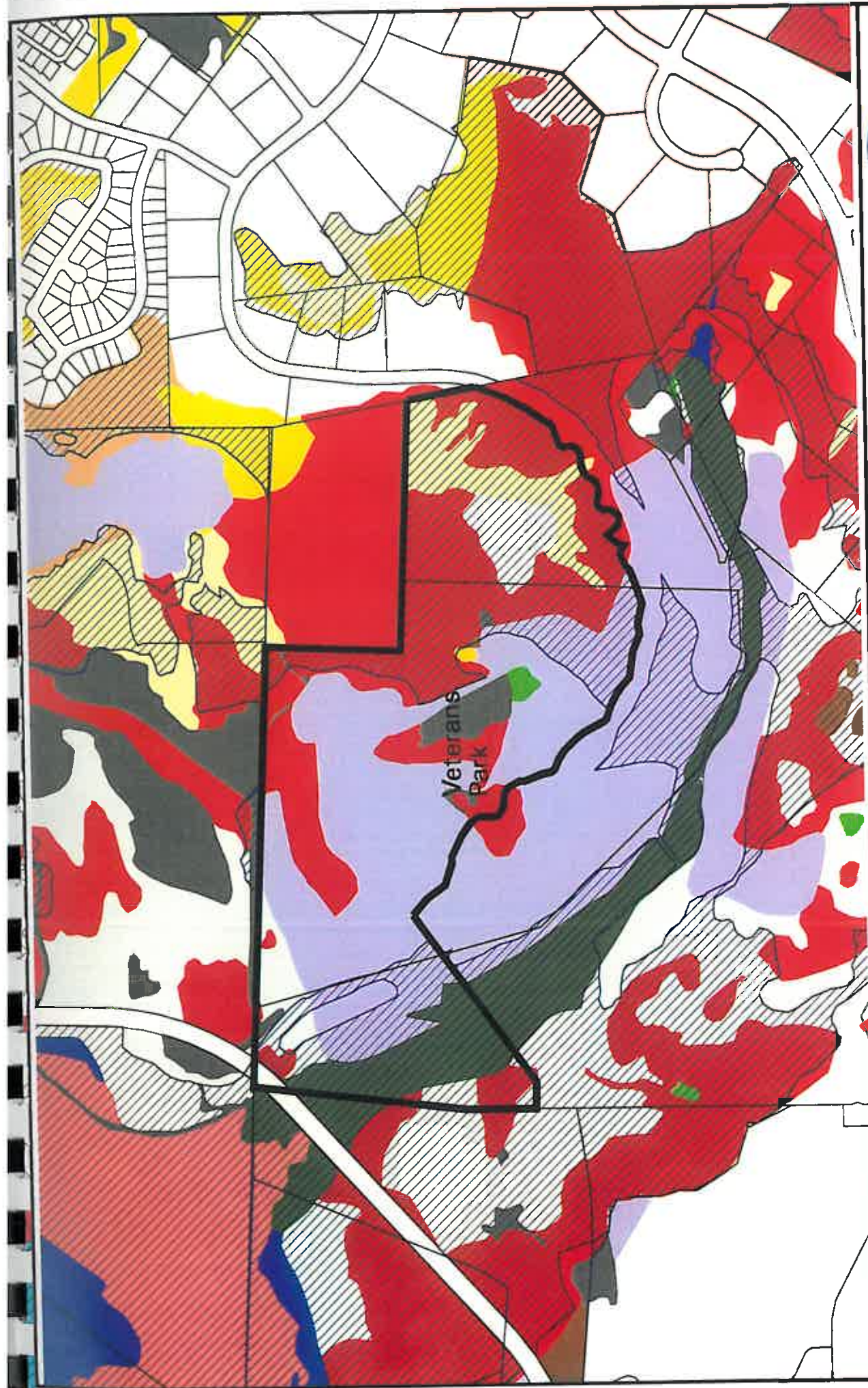
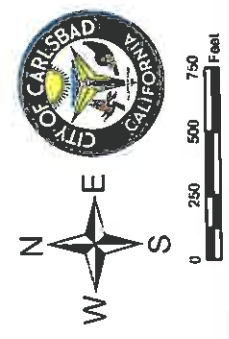
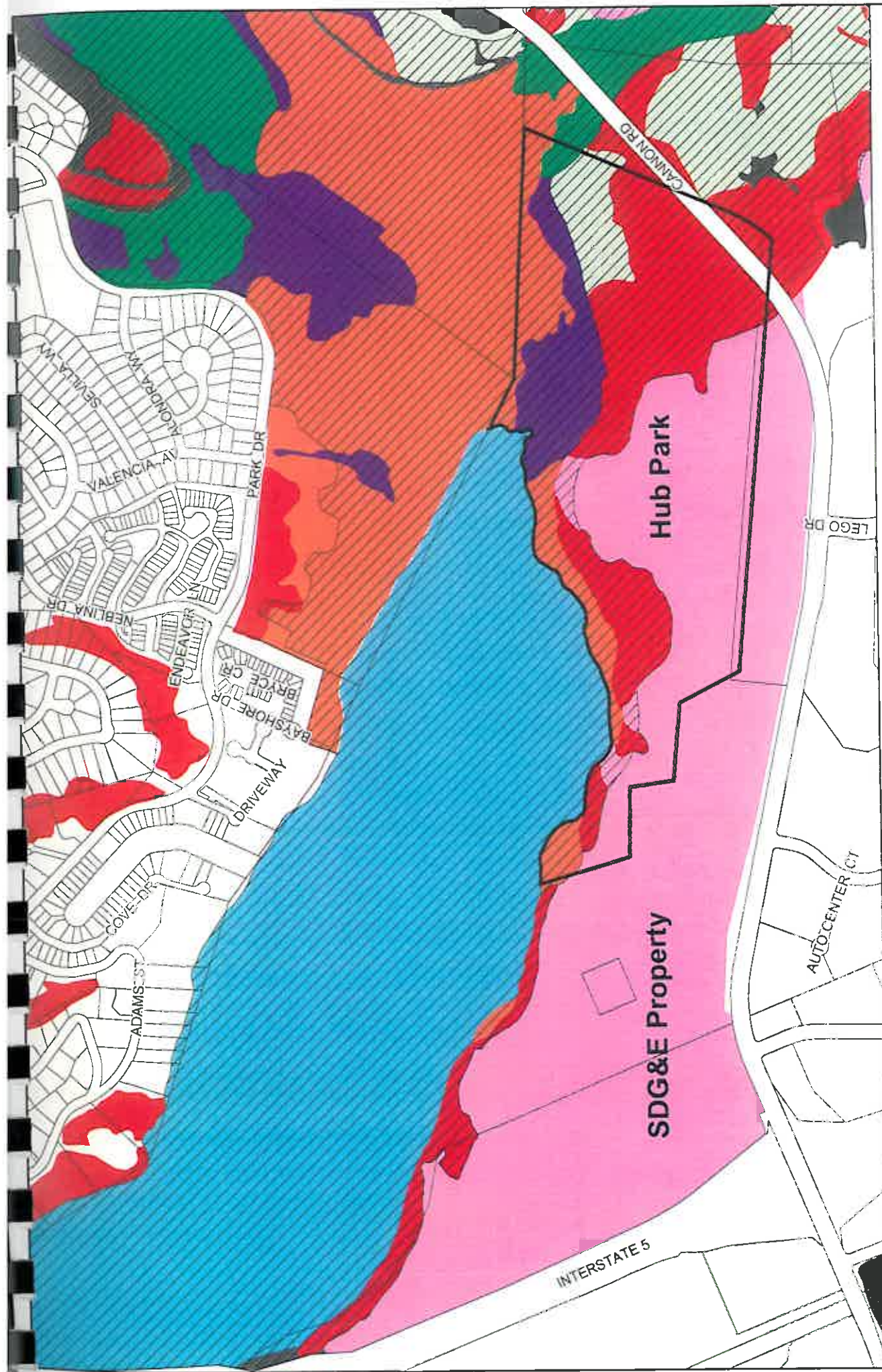


Figure 16
Veterans Memorial Park



**Figure 17 - Revised
Hub Park and SDG&E Property**
Previously included in Addendum No. 2

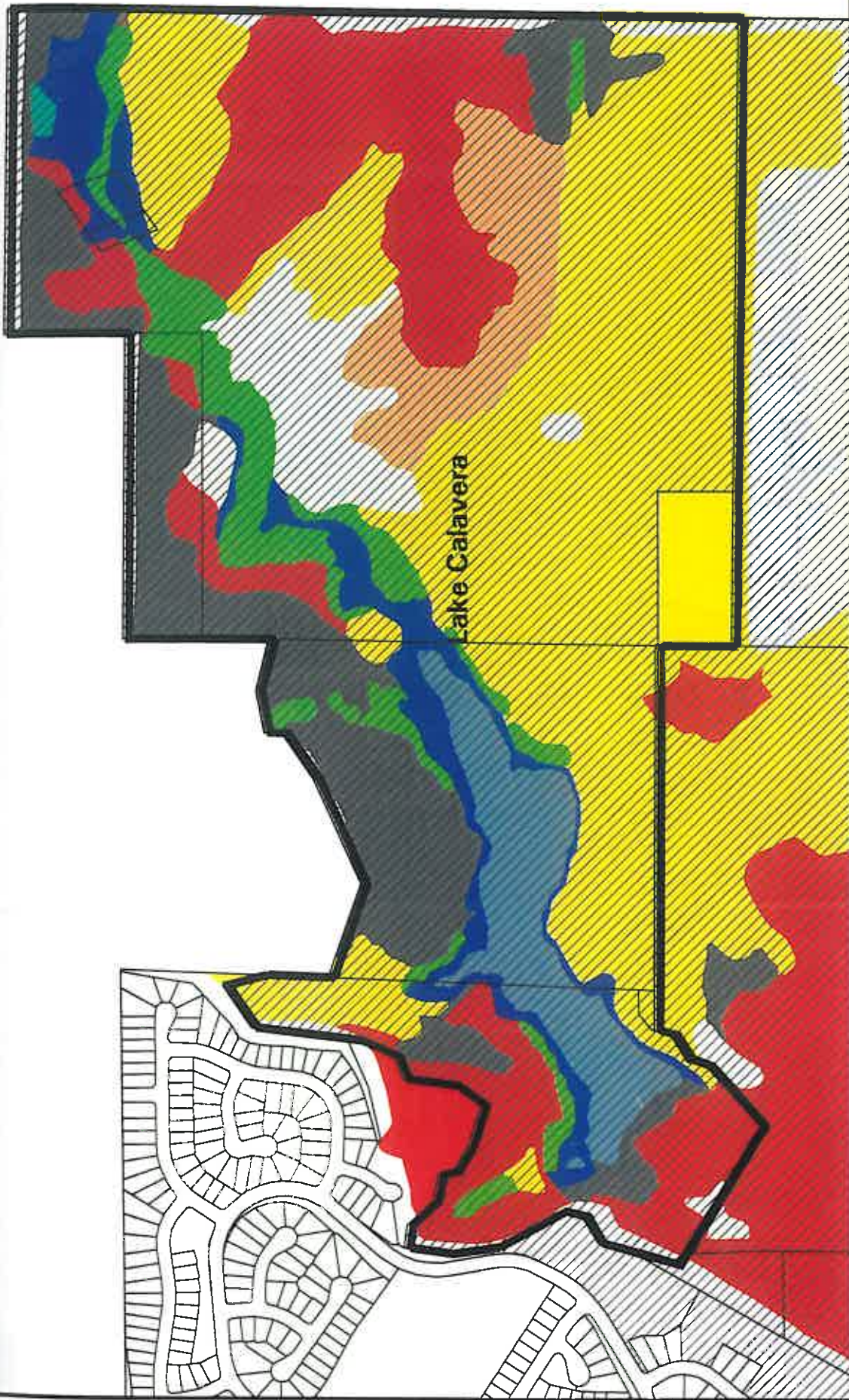


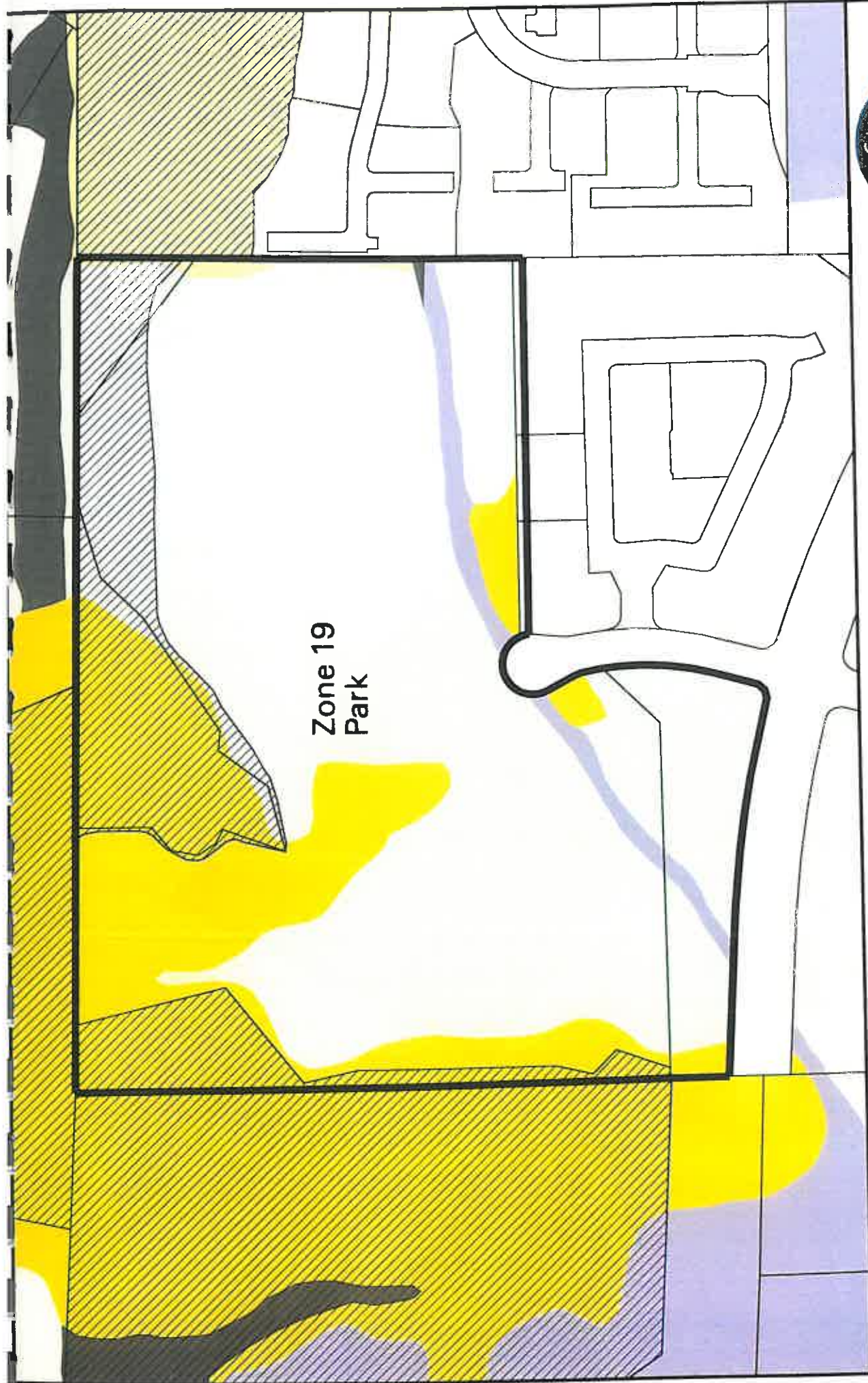
Figure 18
Lake Calavera

11/24/89

© 1998 City of Carlsbad

© 1998 City of Carlsbad





Zone 19
Park



200

200

0

200



FEET

Figure 19
Zone 19 Park

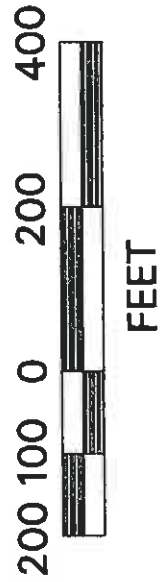


Figure 20
Hieatt

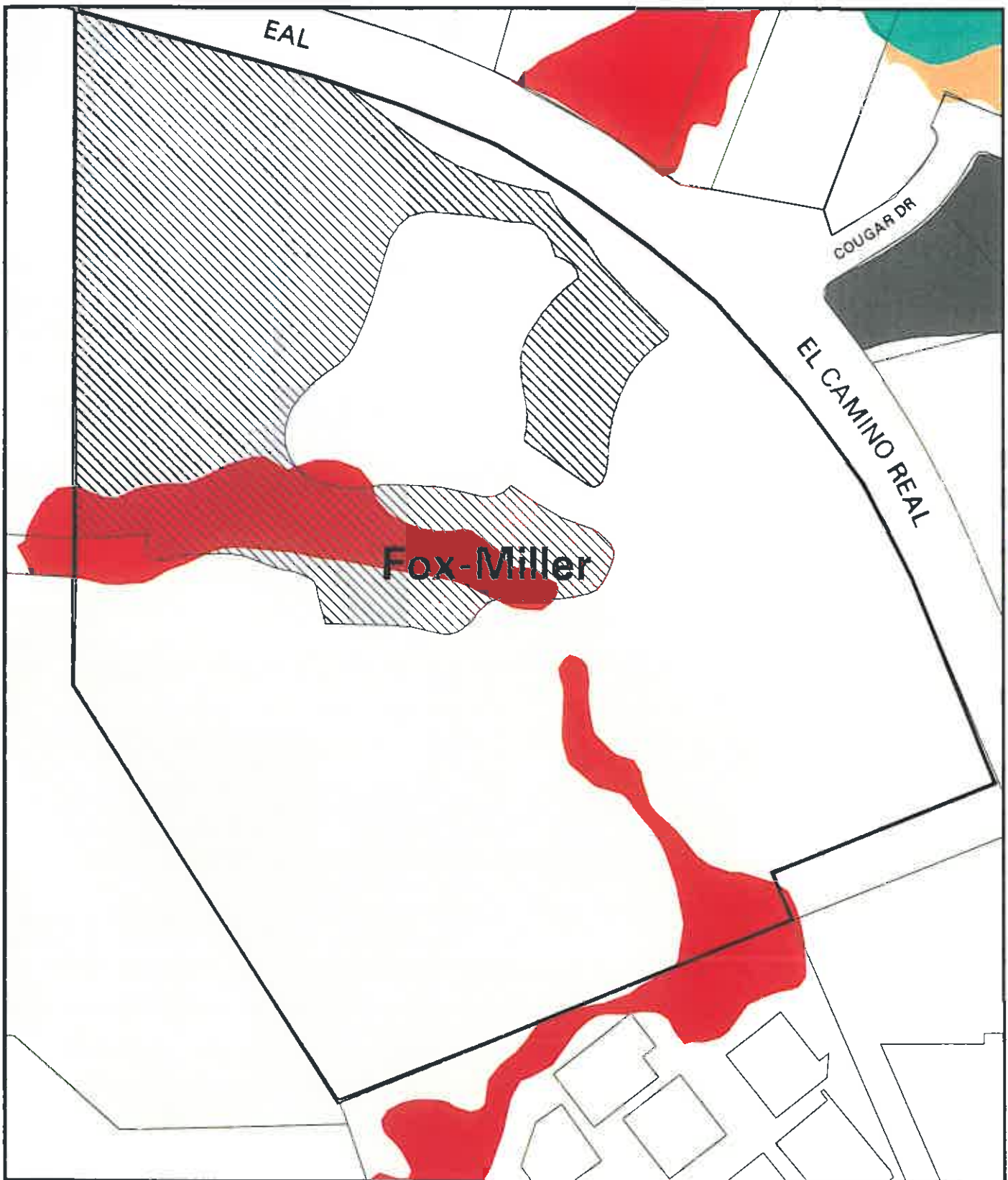


Figure 21
Fox-Miller



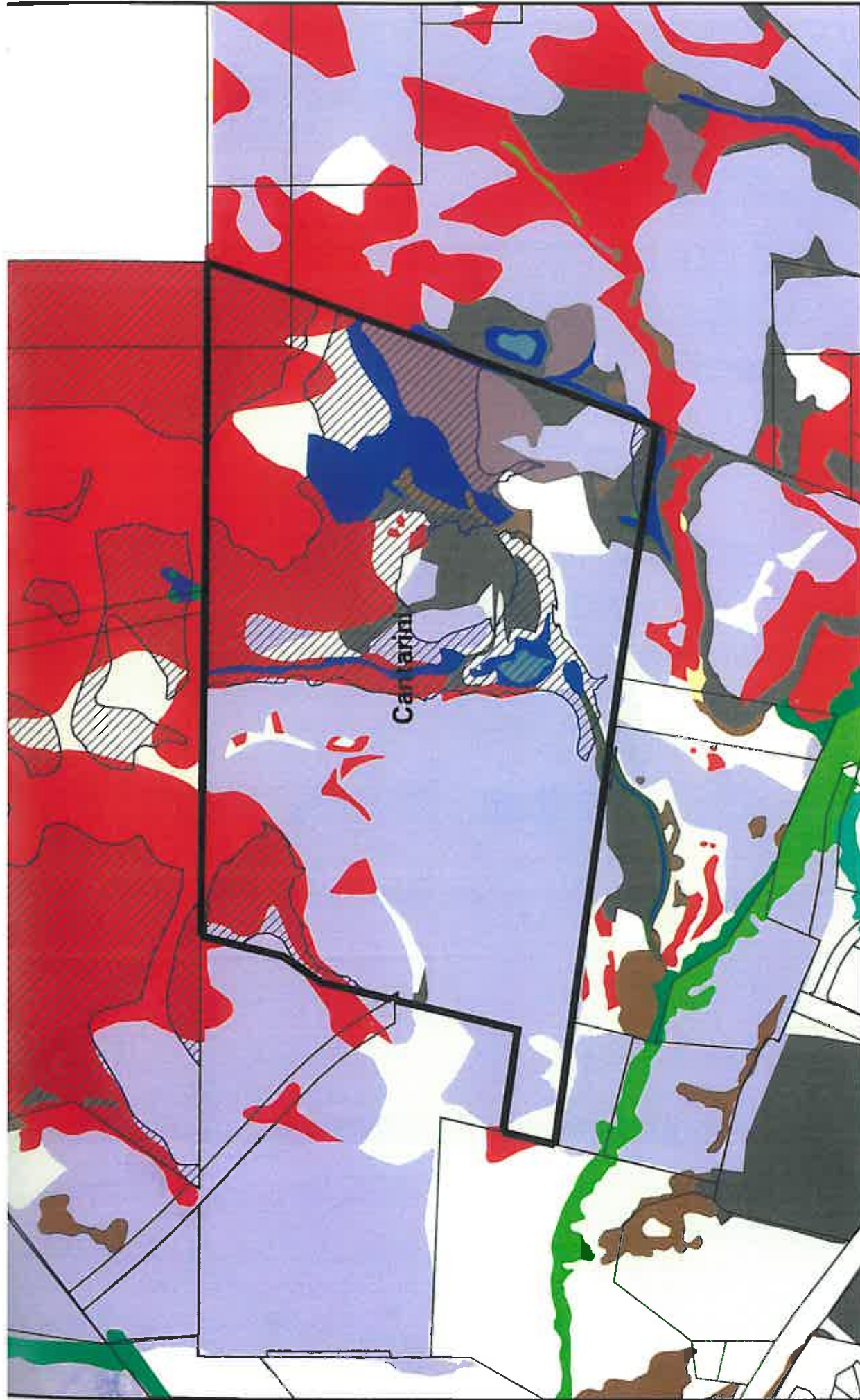


Figure 24
Cantarini



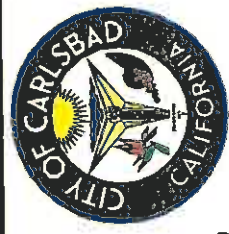


Figure 25
Kevane

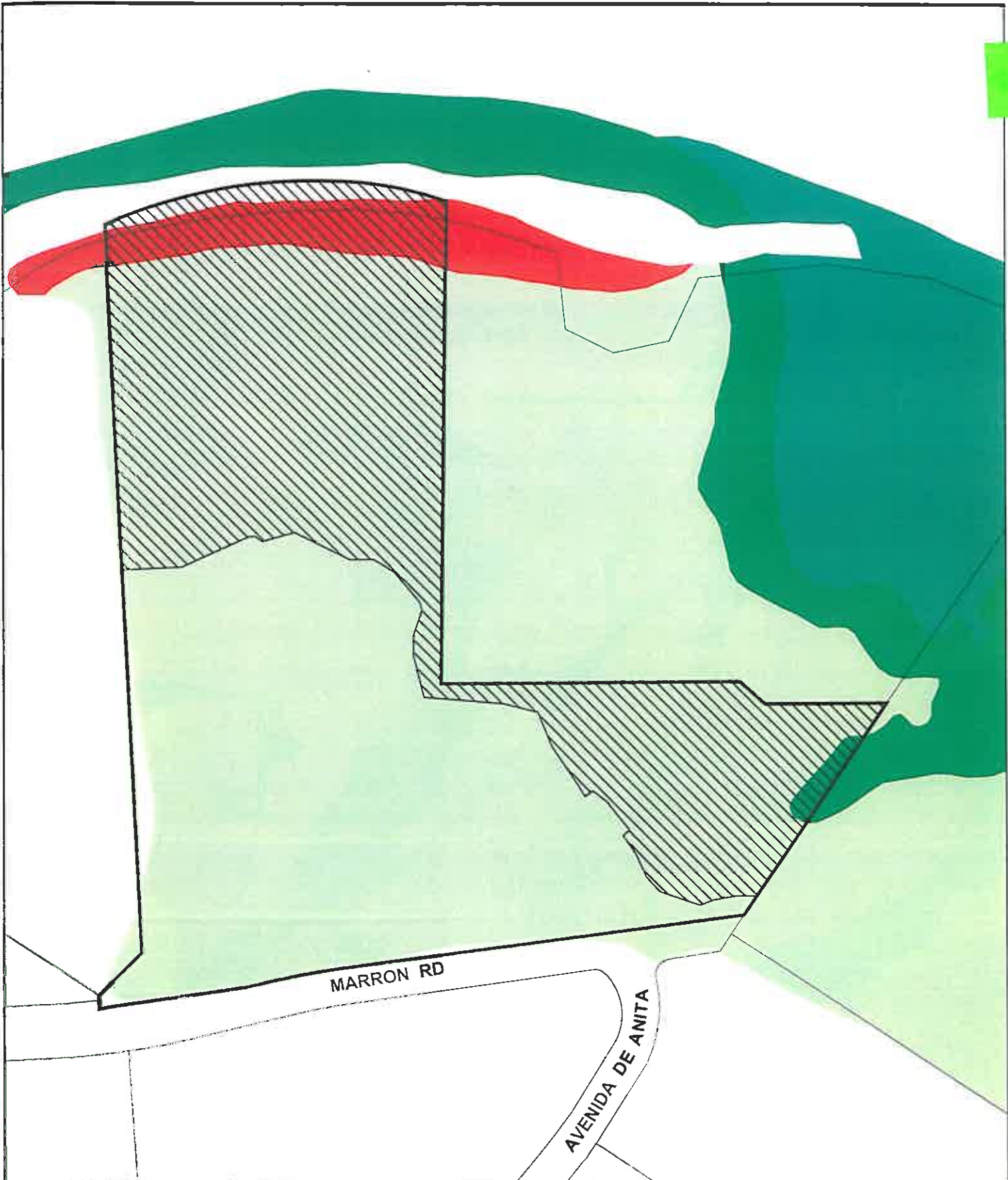


Figure 34
Summit at Carlsbad Property

Previously included in Addendum No. 2

Printed 24 November 2004 /cargis2/products/planning/r368.02/summitplot.mxd



0 100 200 400 Feet

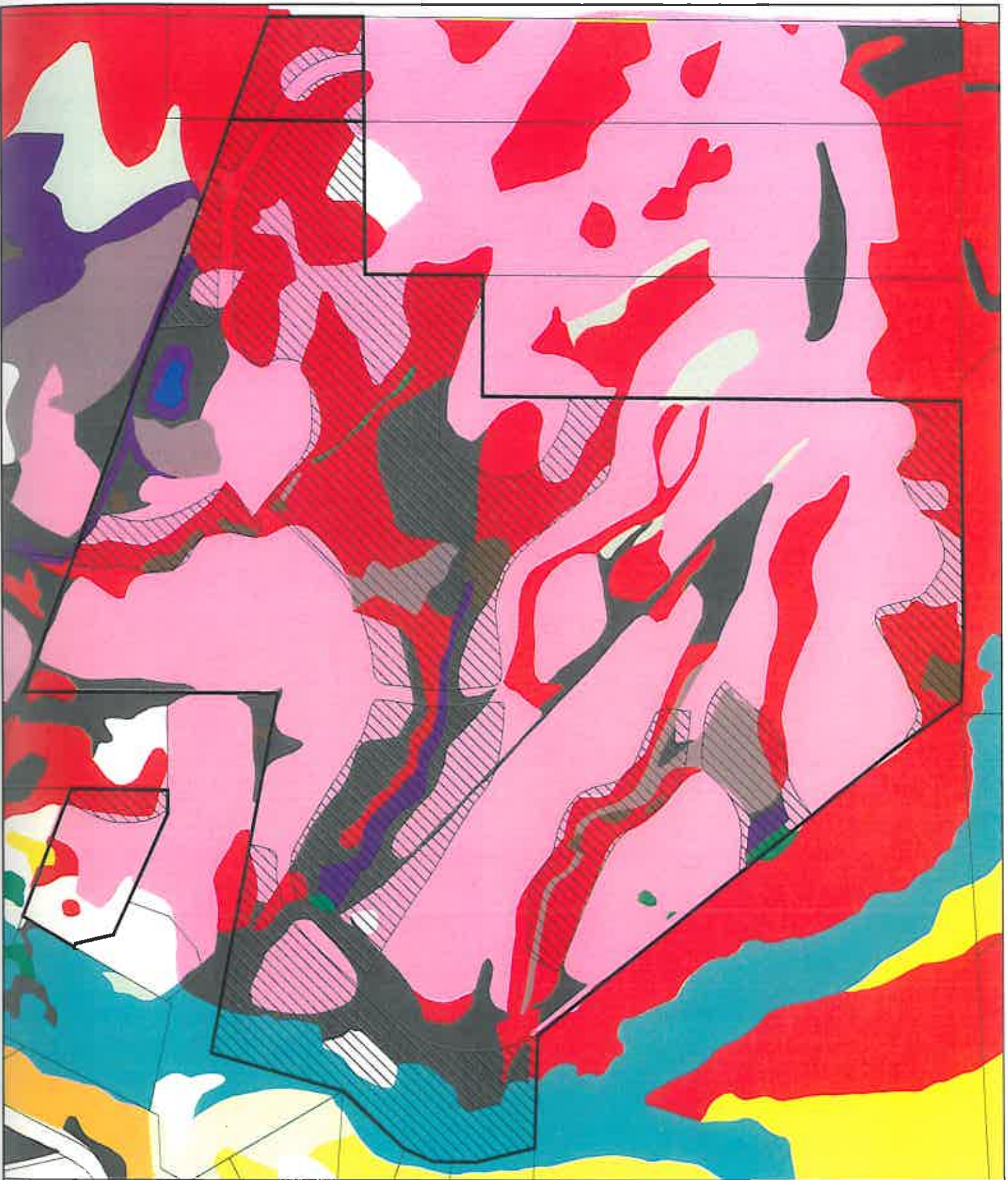


Figure 35
Mandana Property

Previously included in Addendum No. 2

Printed 24 November 2004 I:\cargis2\products\planning\1361 02\Mandana.mxd





Figure 36
Aura Circle

Previously included in Addendum No. 2



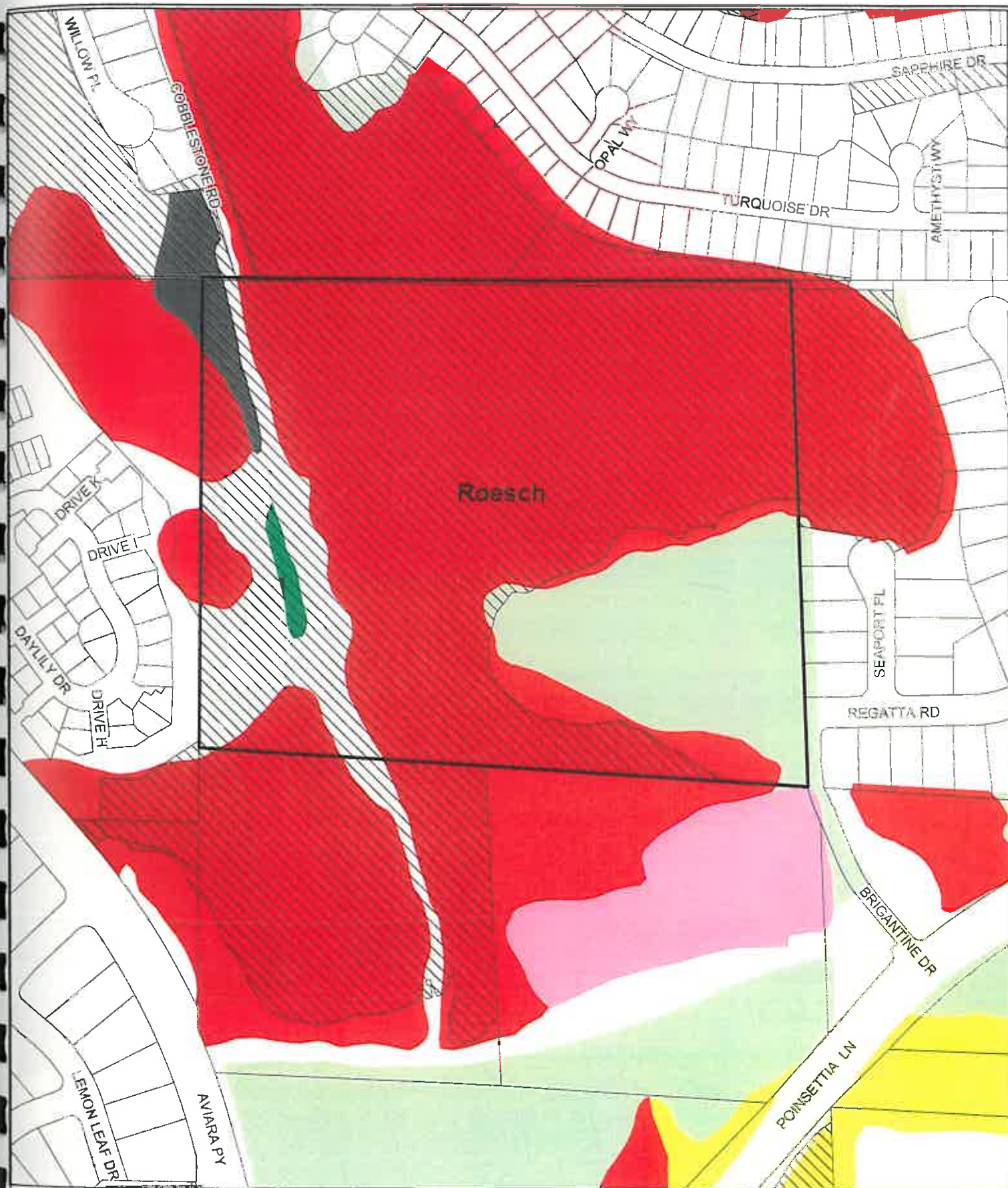
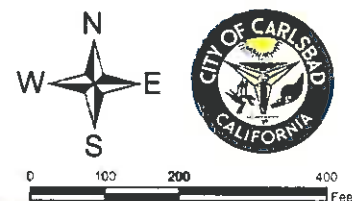


Figure 37
Roesch

Previously included in Addendum No. 2

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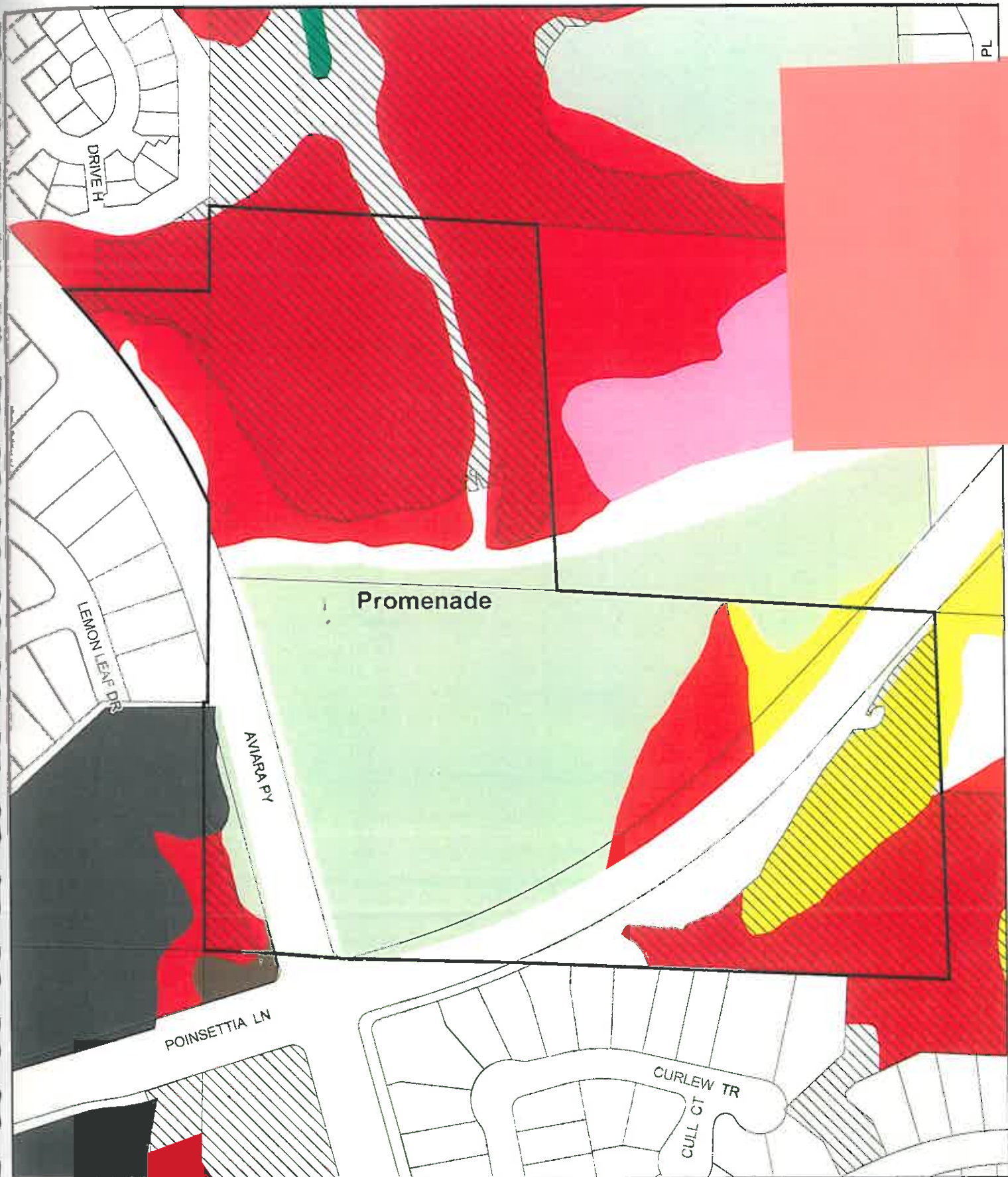


Figure 38
Promenade

Previously included in Addendum No. 2



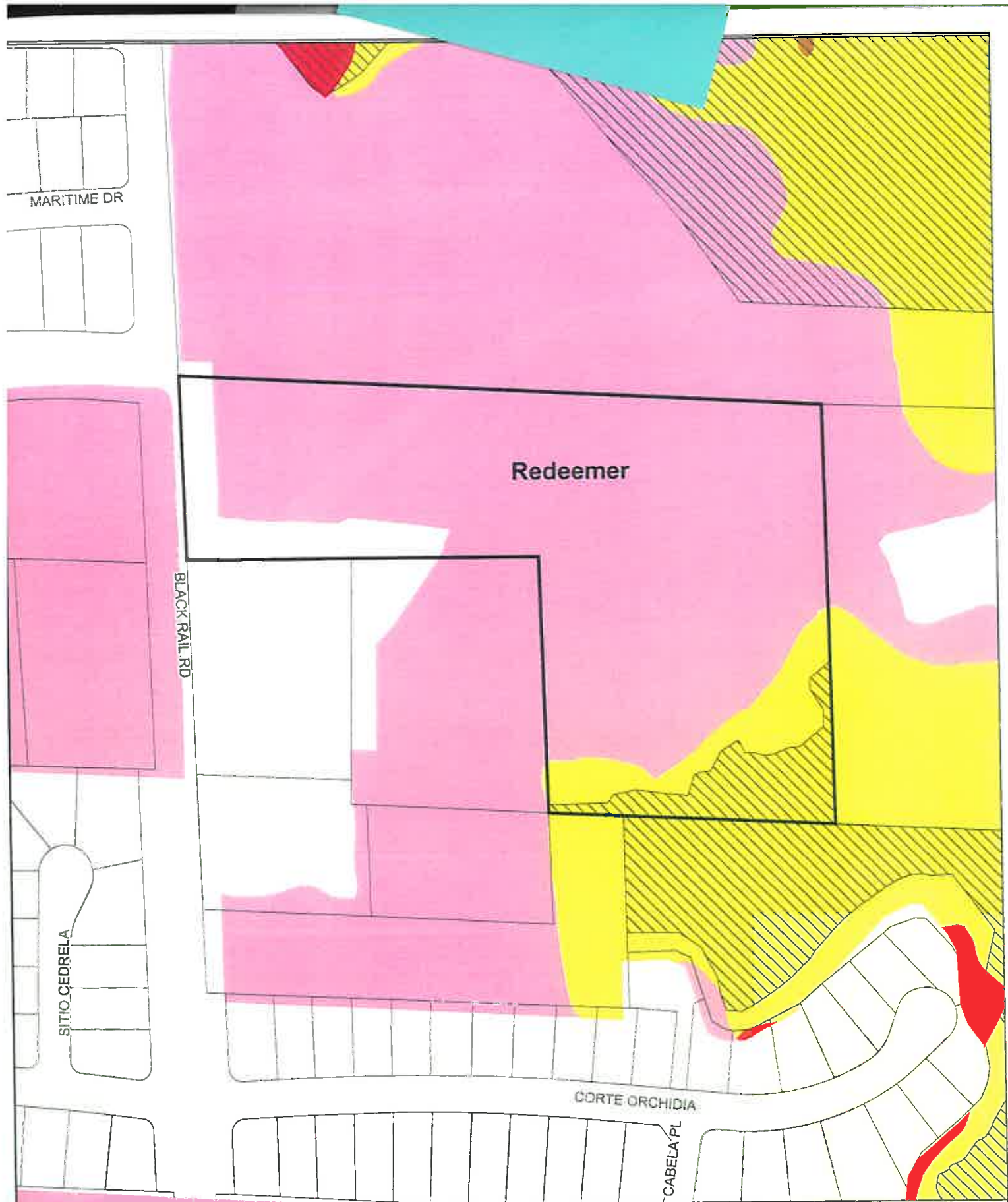
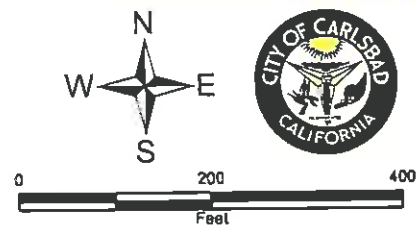


Figure 39 Redeemer by The Sea

Previously included in Addendum No. 2

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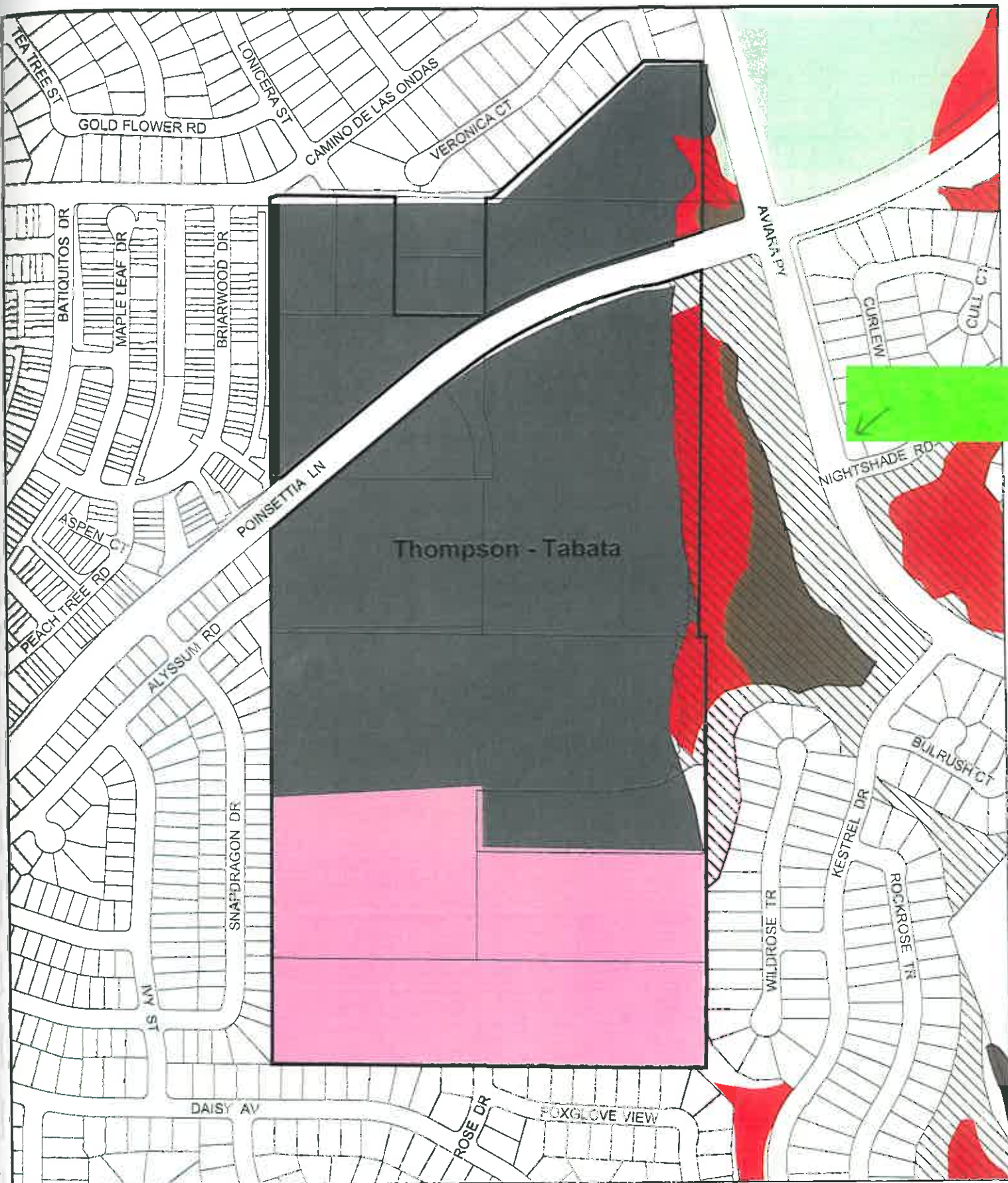
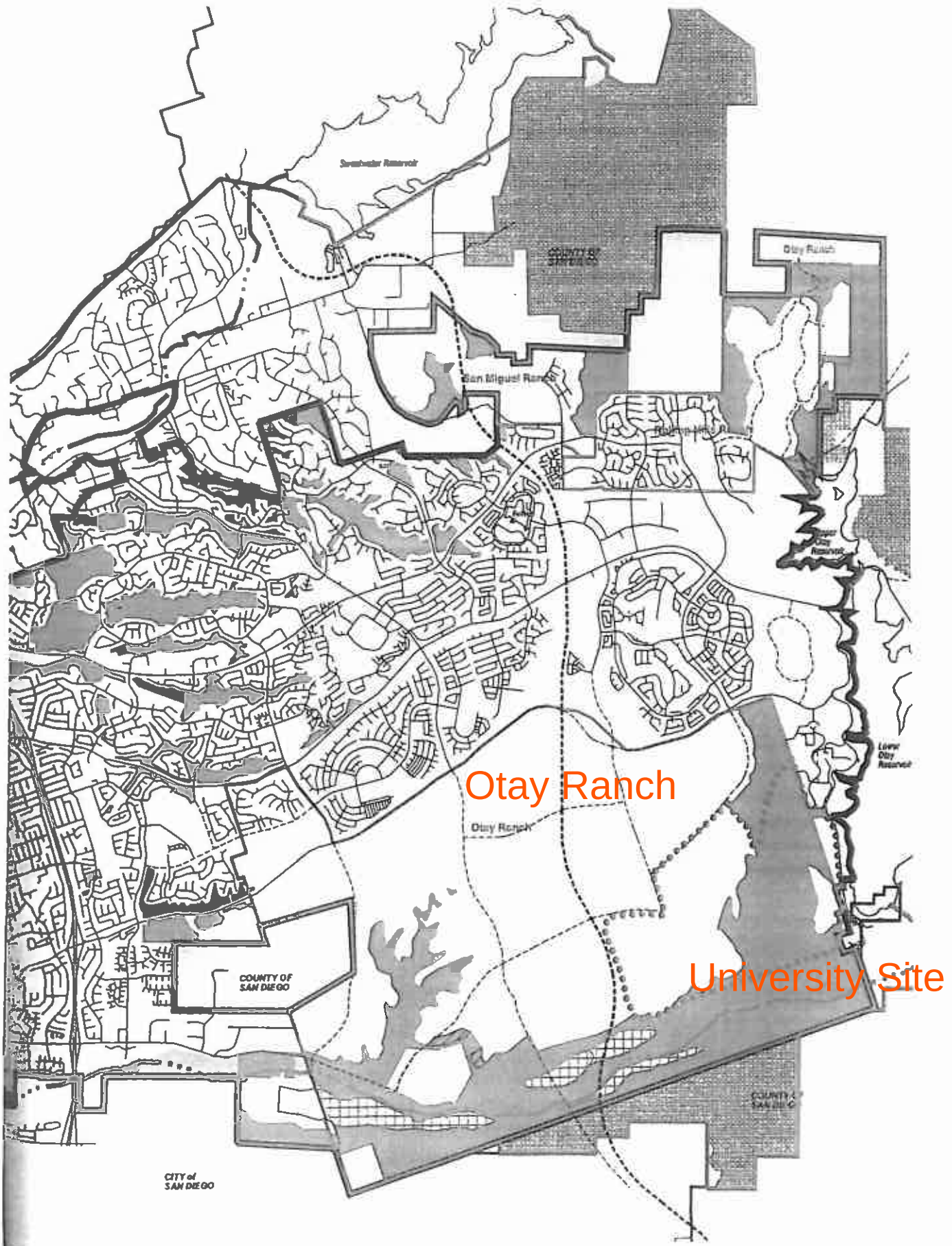


Figure 40
Thompson - Tabata

Previously included in Addendum No. 2

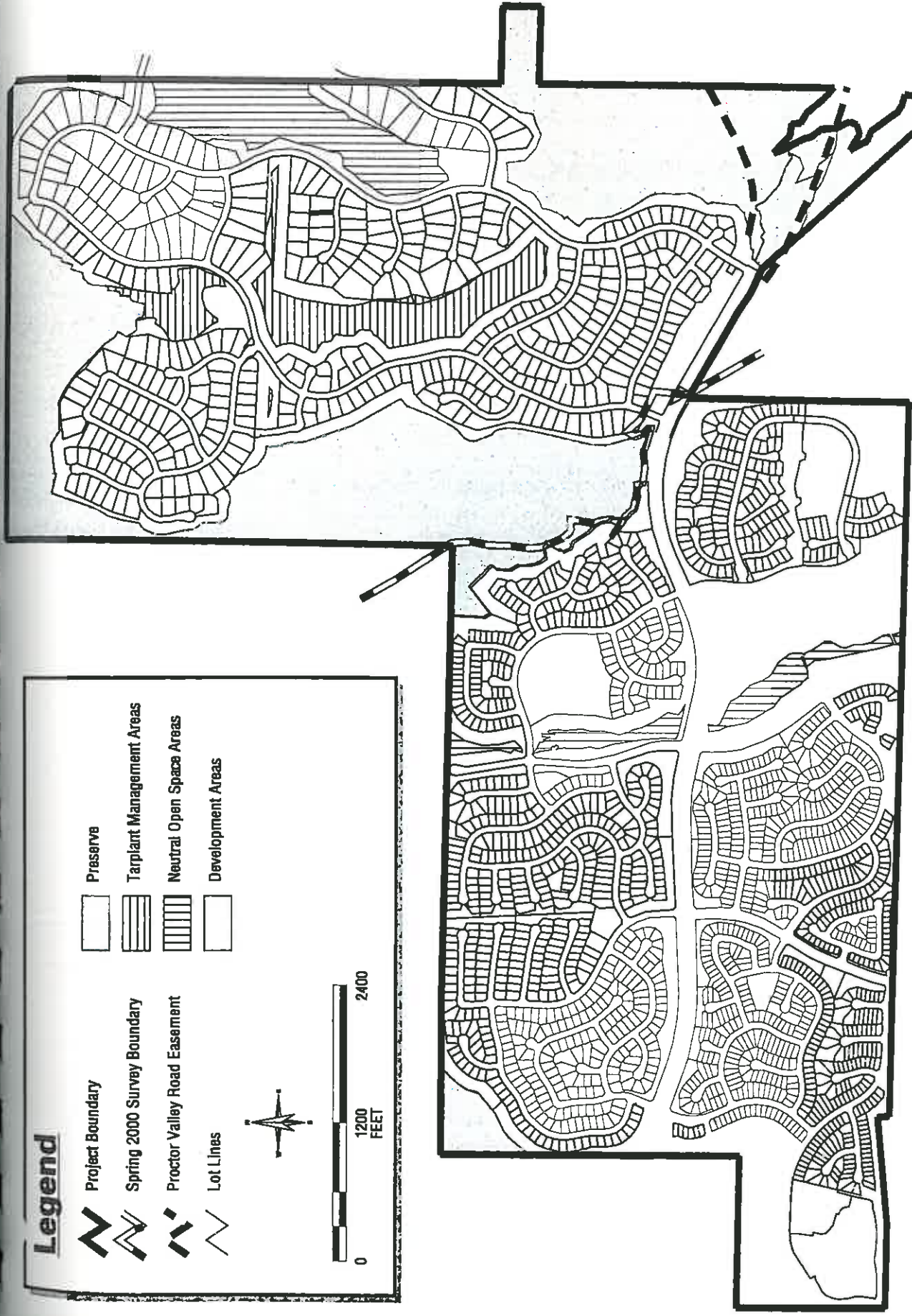




Chula Vista Covered Projects

Legend

- | | | | |
|---|------------------------------|---|---------------------------|
|  | Project Boundary |  | Preserve |
|  | Spring 2000 Survey Boundary |  | Tarplant Management Areas |
|  | Proctor Valley Road Easement |  | Neutral Open Space Areas |
|  | Lot Lines |  | Development Areas |



**FIGURE
7-2**

Rolling Hills Ranch

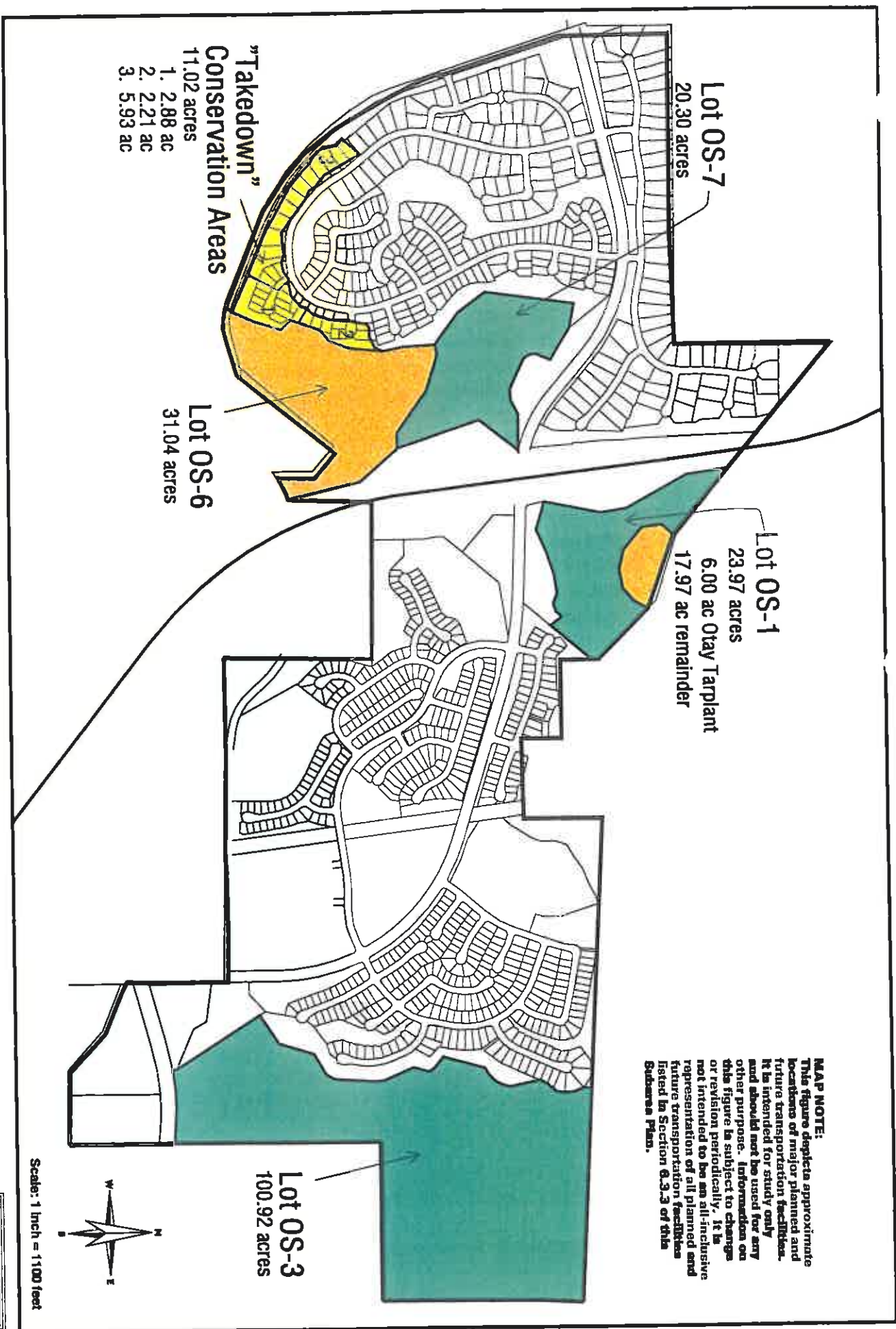


CITY OF
CHULA VISTA

GEOGRAPHIC INFORMATION SYSTEM

Plot created: February 07, 2002
C:\planning\mcs\p\hrr\hrr.mxd

MAP NOTE:
This figure depicts approximate locations of major planned and future transportation facilities. It is intended for study only and should not be used for any other purpose. Information on this figure is subject to change or revision periodically. It is not intended to be an all-inclusive representation of all planned and future transportation facilities listed in Section 6.3.3 of this Subarea Plan.



Scale: 1 inch = 1100 feet



Legend

Otay Tarplant Preserve Area

Additional Otay Tarplant Conservation

San Miguel Ranch Conservation

FIGURE 7-3



CITY OF CHULA VISTA

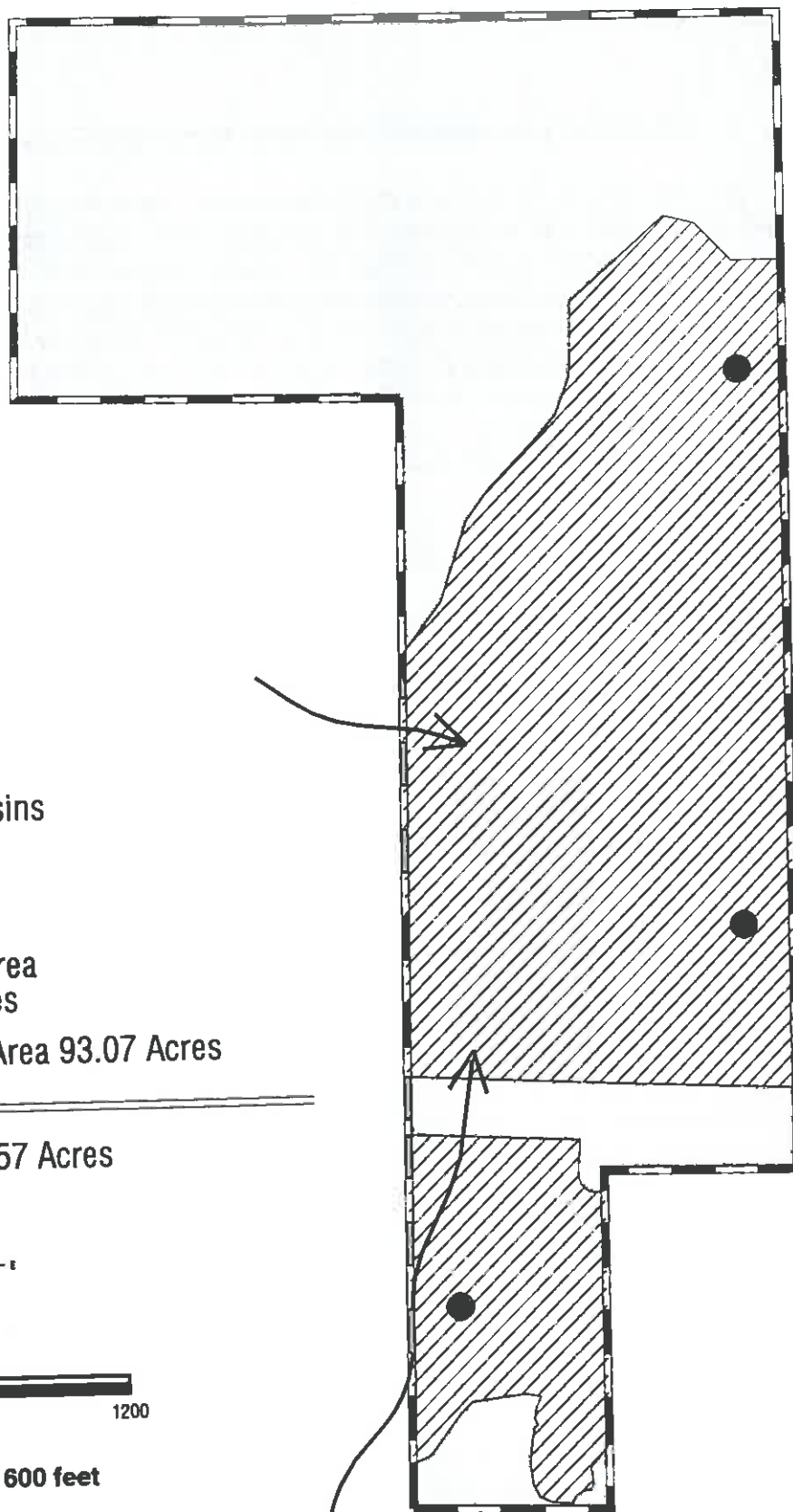
Legend

- Future Detention Basins
- ▤ Project Boundary
- ▤ Project Access
- On Site Mitigation Area (Preserve) 86.5 Acres
- ▨ Total Development Area 93.07 Acres

Total Site Area 179.57 Acres

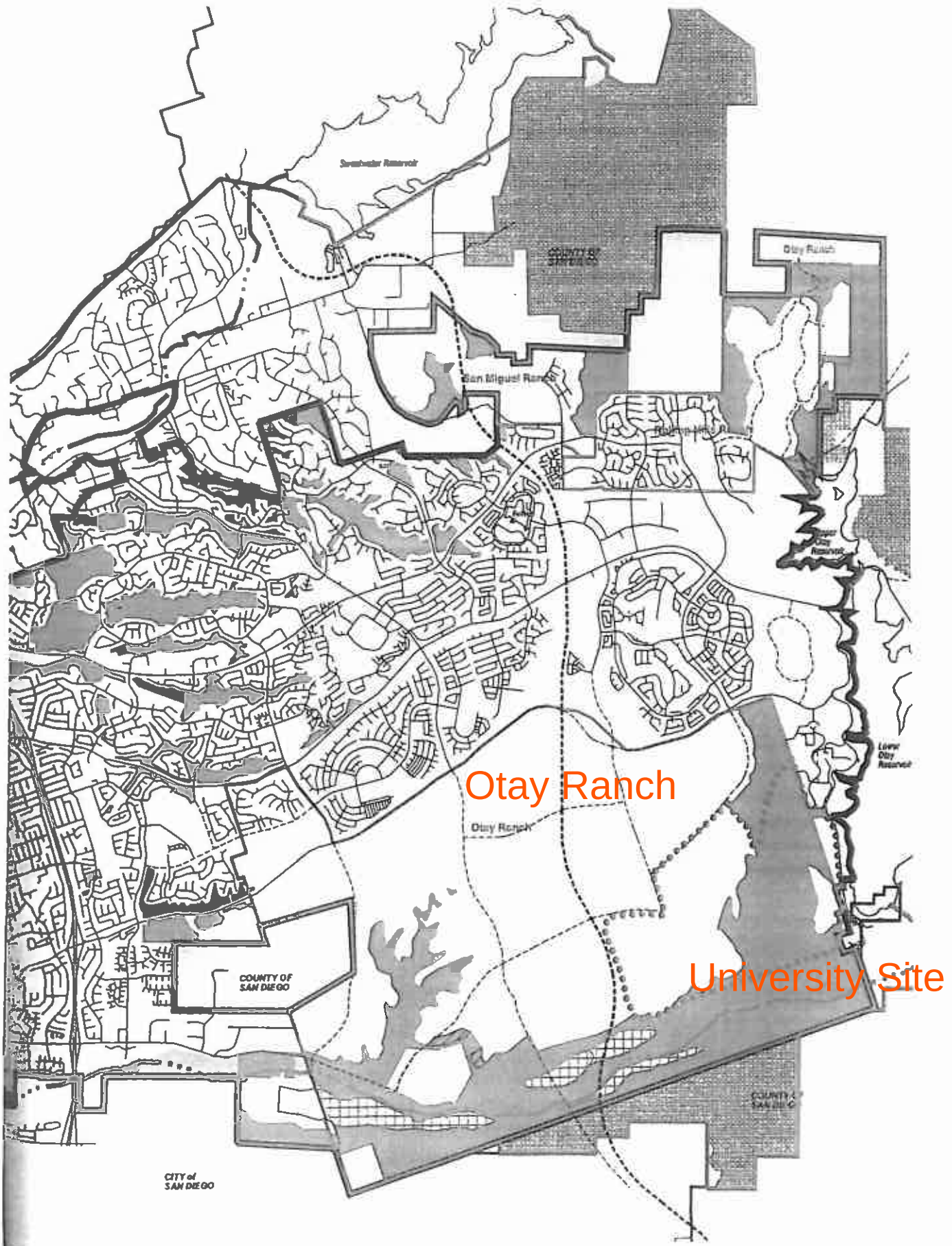


Scale: 1 inch = 600 feet

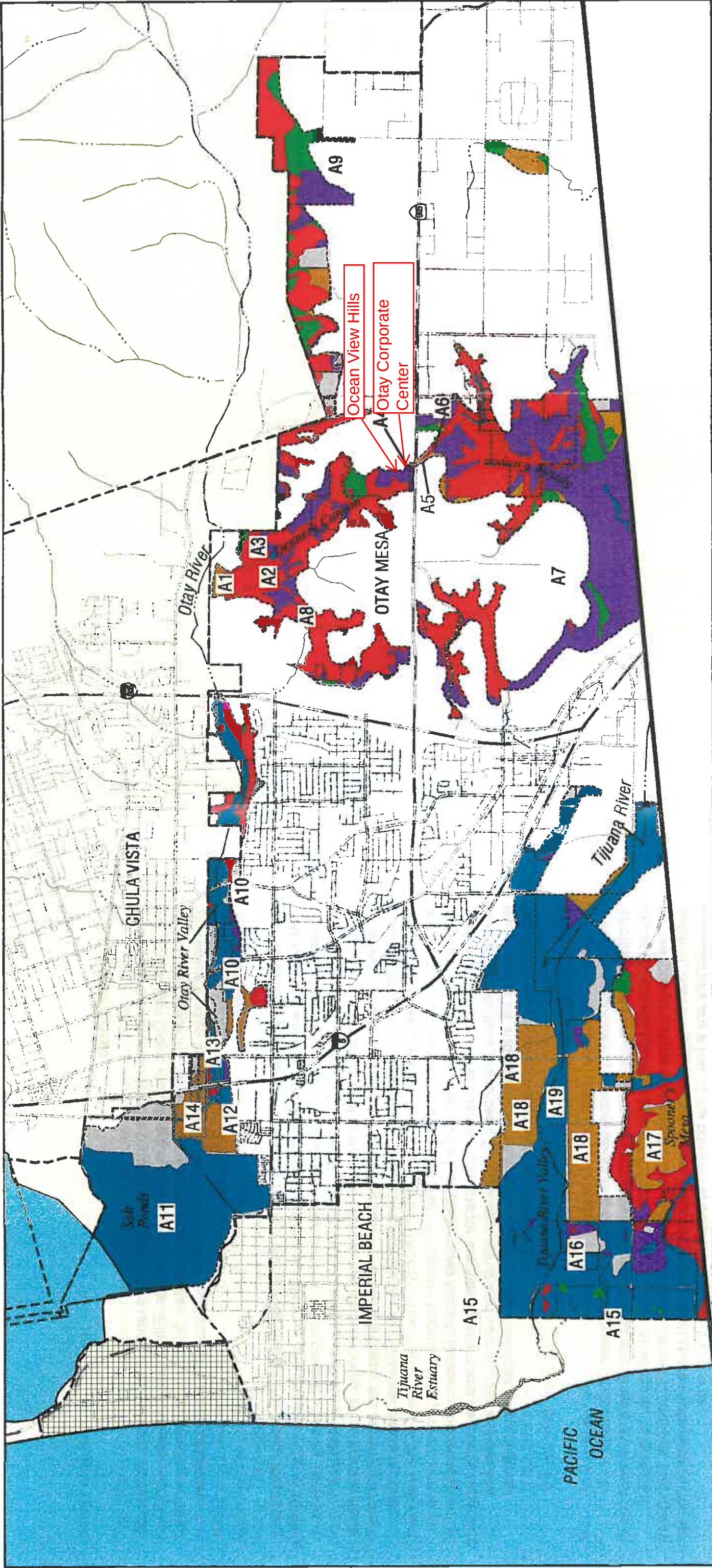


Bella Lago

FIGURE
7-4



Chula Vista Covered Projects



Vegetation Communities

- Coastal Sage Scrub
- Chaparral
- Coastal Sage Scrub/Chaparral
- Grassland
- Riparian/Wetlands
- Oak Woodland
- Coniferous Forest
- Beach/Foredunes
- Eucalyptus Woodland
- Disturbed Habitat
- Shallow Bay

- Developed
- Agriculture

- Subarea Boundary
- MHPA Boundary
- Water District
- Subarea
- Military Lands

Base Map Features

- MSCP Boundary
- U.S. - Mexico Border
- Freeway
- Major Road
- Minor Road
- Major Stream
- Minor Stream
- Lake/Lagoon



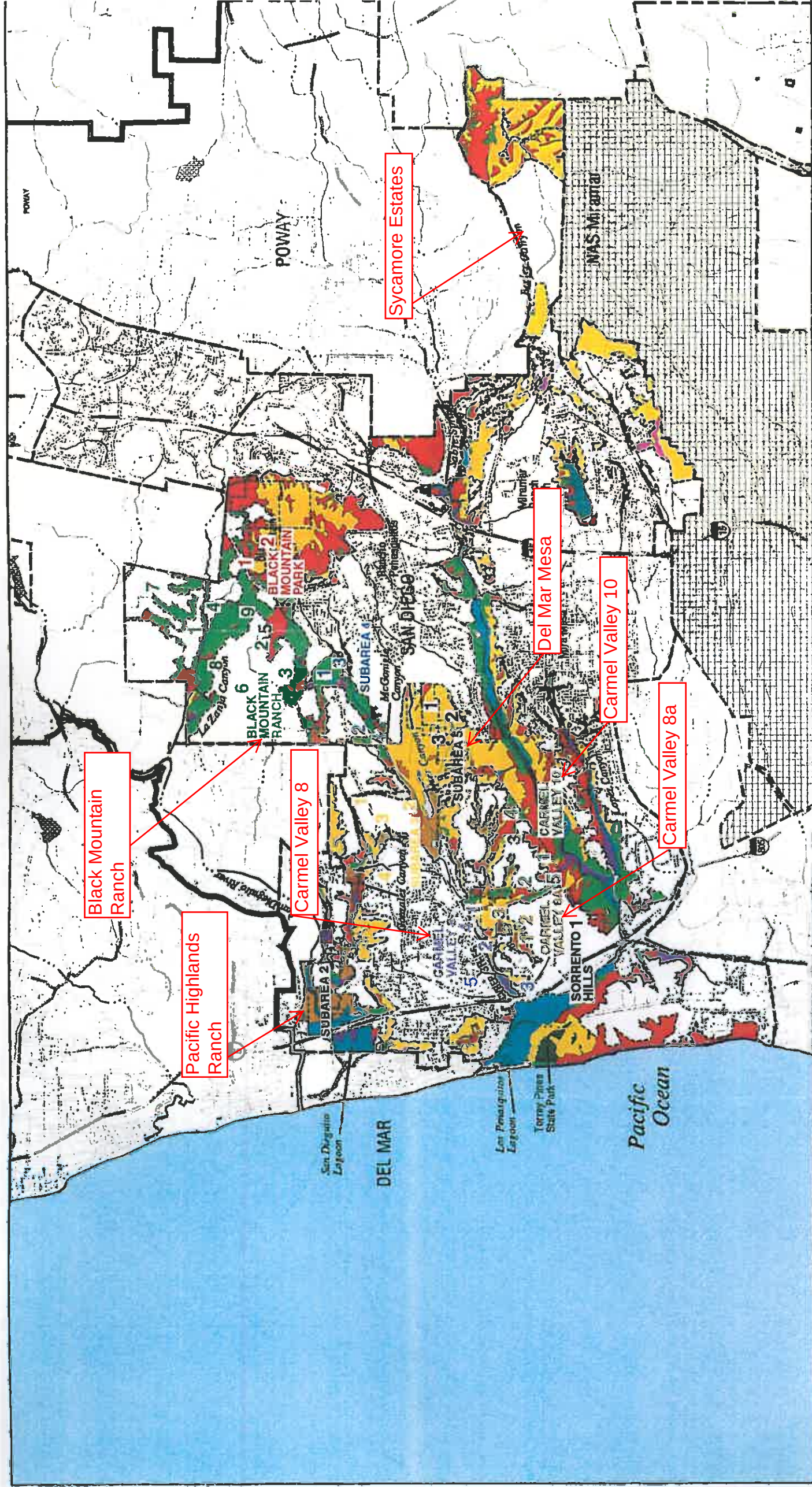
Letter/number indicates MHPA Guideline. See text.

OGDEN

Conserved Vegetation Communities in Southern Area

FIGURE

2



Vegetation Communities

- Coastal Sage Scrub
- Chaparral
- Coastal Sage Scrub/Chaparral
- Grassland
- Riparian/Wetlands
- Oak Woodland
- Coniferous Forest
- Beach/Foredunes
- Eucalyptus Woodland
- Disturbed Habitat
- Shallow Bay

Number indicates reference in text.

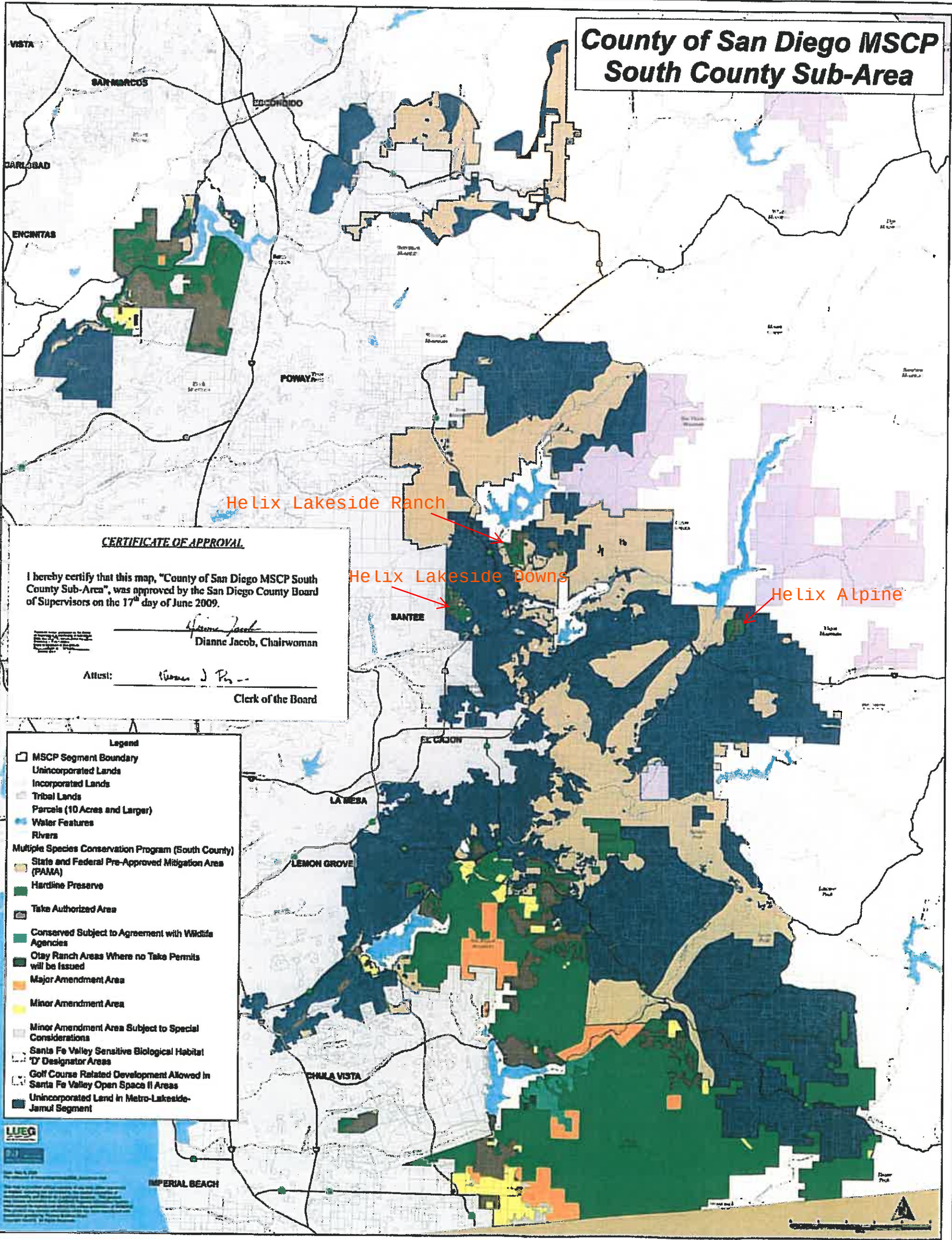
Base Map Features

- Subarea Boundary
- MHPA Boundary
- Water District
- Subarea
- Military Lands
- Developed
- Agriculture
- Major Stream
- Minor Stream
- Lake/Lagoon
- MSCP Boundary
- U.S. - Mexico Border
- Freeway
- Major Road
- Minor Road



Preserve Management: Specific Management Recommendations, Priority 1
City of San Diego MHPA - Northern Area

**County of San Diego MSCP
South County Sub-Area**



CERTIFICATE OF APPROVAL

I hereby certify that this map, "County of San Diego MSCP South County Sub-Area", was approved by the San Diego County Board of Supervisors on the 17th day of June 2009.

Dianne Jacob
Dianne Jacob, Chairwoman

Attest: *Thomas J. Piro*
Clerk of the Board

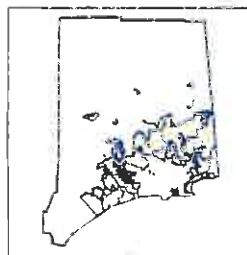
- Legend**
- MSCP Segment Boundary
 - Unincorporated Lands
 - Incorporated Lands
 - Tribal Lands
 - Parcels (10 Acres and Larger)
 - Water Features
 - Rivers
 - Multiple Species Conservation Program (South County)
 - State and Federal Pre-Approved Mitigation Area (PAMA)
 - Hardline Preserve
 - Take Authorized Area
 - Conserved Subject to Agreement with Wildlife Agencies
 - Otay Ranch Areas Where no Take Permits will be issued
 - Major Amendment Area
 - Minor Amendment Area
 - Minor Amendment Area Subject to Special Considerations
 - Santa Fe Valley Sensitive Biological Habitat 'D' Designator Areas
 - Golf Course Related Development Allowed in Santa Fe Valley Open Space II Areas
 - Unincorporated Land in Metro-Lakeside-Jamul Segment

LUEG
2.1
San Diego County Department of Planning and Economic Development
Map No. 1000
June 2009
This map is a technical illustration of the County of San Diego MSCP South County Sub-Area. It is not a legal document and should not be used for legal purposes. For more information, please contact the County of San Diego Department of Planning and Economic Development.

County of San Diego Sub-Area

Lake Hodges Segment

- Take Authorized Area
- Proposed for Amendment Unreviewed Projects on its MSCP Permit
- Major Amendment Area
- Minor Amendment Area
- No Take Authorized
- Golf Course Related Development Allowed in Open Space B Areas
- Sensitive Biological Habitat
- 100' Designator Areas
- Take Authorized Consistent with Metro/Lakeside/Jamul Segment Criteria
- Unincorporated Lands in MSCP
- Incorporated Cities
- La Jolla
- Rancho
- Parcel Lines
- Sub-Area Segment Boundary
- MSCP Boundary



RUI
COUNTY OF SAN DIEGO

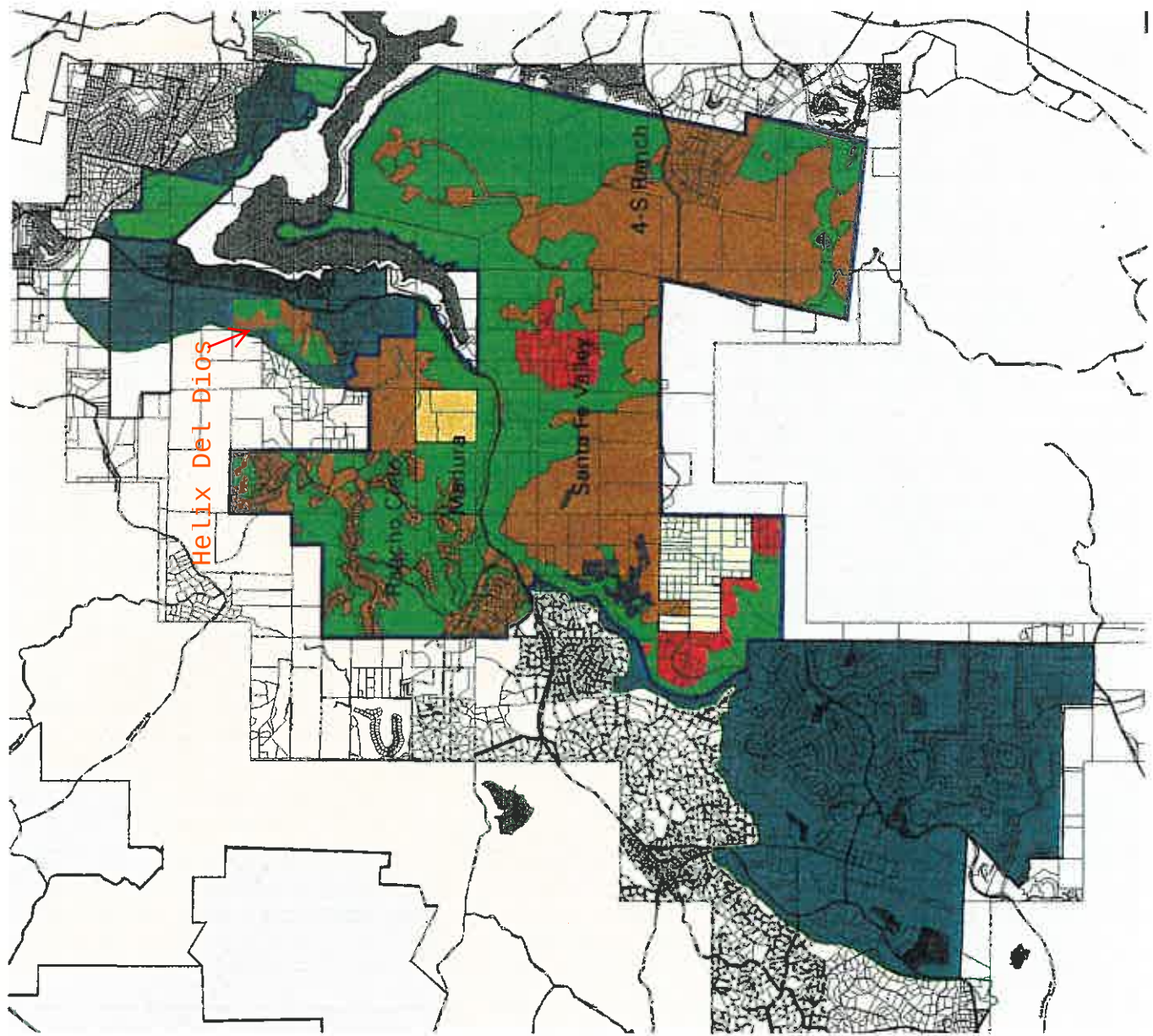


FIG. 1-2

County of San Diego MSCP South County Sub-Area

CERTIFICATE OF APPROVAL

I hereby certify that this map, "County of San Diego MSCP South County Sub-Area", was approved by the San Diego County Board of Supervisors on the 17th day of June 2009.

Dianne Jacob
Dianne Jacob, Chairwoman

Attest: *Thomas J. P...*
Clerk of the Board

Legend

- MSCP Segment Boundary
- Unincorporated Lands
- Incorporated Lands
- Tribal Lands
- Parcels (10 Acres and Larger)
- Water Features
- Rivers
- Multiple Species Conservation Program (South County)**
 - State and Federal Pre-Approved Mitigation Area (PAMA)
 - Hardline Preserve
 - Take Authorized Area
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 - Major Amendment Area
 - Minor Amendment Area
 - Minor Amendment Area Subject to Special Considerations
 - Santa Fe Valley Sensitive Biological Habitat 'D' Designator Areas
 - Golf Course Related Development Allowed in Santa Fe Valley Open Space II Areas
 - Unincorporated Land in Metro-Lakeside-Jamul Segment

PA19
PA16
V14
V13
PA17

LUEG

2.1

San Diego County Board of Supervisors
June 17, 2009
This map is a representation of the County of San Diego Multiple Species Conservation Program (MSCP) South County Sub-Area. It is not a legal document and should not be used for legal purposes. The map is subject to change without notice.

IMPERIAL BEACH

CHULA VISTA

LEMON GROVE

LA MESA

SECAJON

SANTEE

POWAY

VISTA

SAN MARCOS

ESCONDIDO

CARLSBAD

ENCINITAS



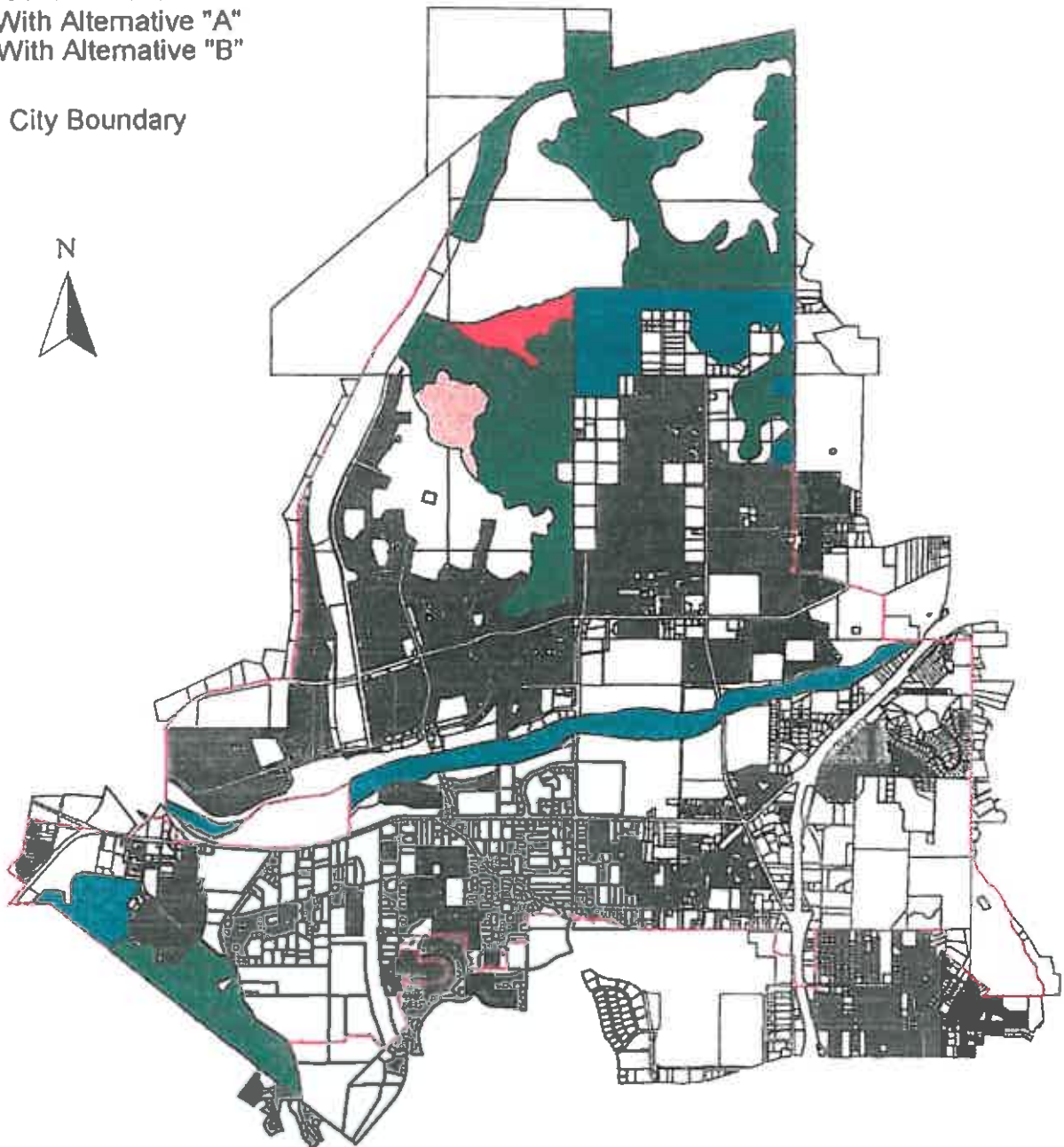
City of Santee
Proposed Draft Preserve

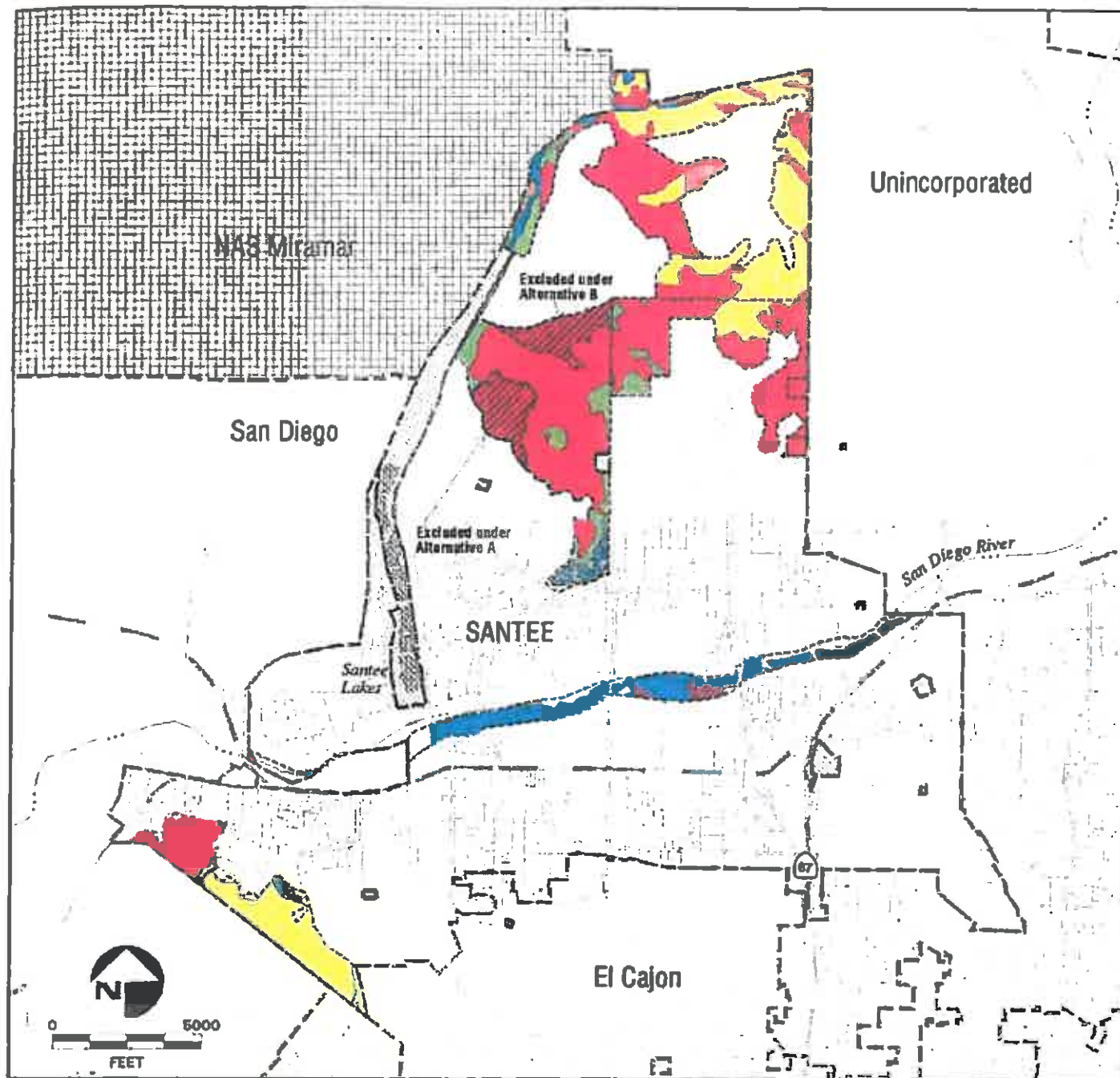
LEGEND

Preserve

-  Exclusion Area
-  100% Preserve Area
-  90% Preserve Area
-  With Alternative "A"
-  With Alternative "B"

 City Boundary





Vegetation Communities

	Coastal Sage Scrub		Coniferous Forest
	Chaparral		Beach/Foredunes
	Coastal Sage Scrub		Eucalyptus Woodland
	Chaparral		Disturbed Habitat
	Grassland		Shallow Bay
	Riparian/Wetlands		Developed
	Oak Woodland		Agriculture

Base Map Features

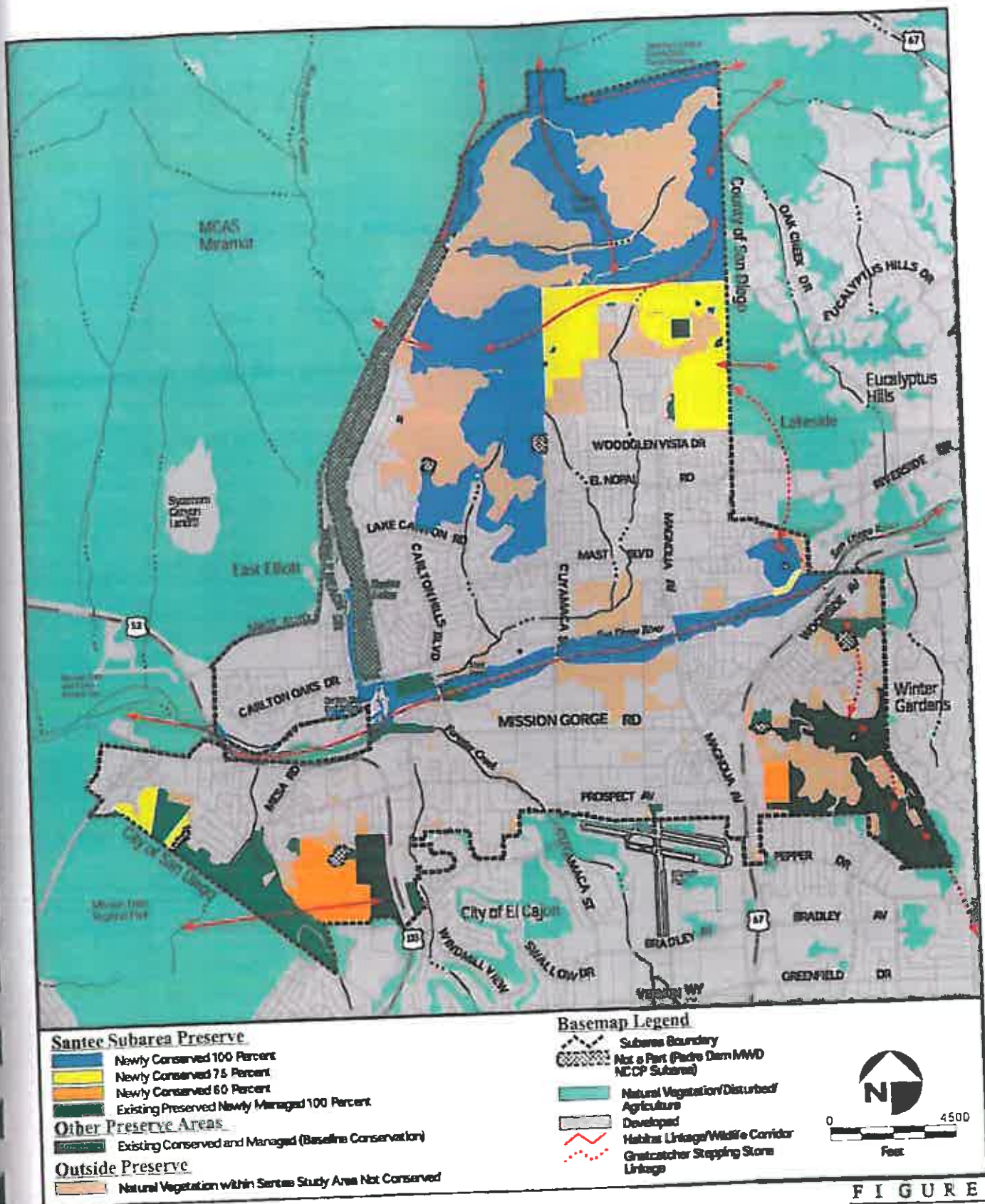
	Subarea Boundary		MSCP Boundary
	Preserve Boundary		U.S. - Mexico Border
	Water District		Freeway
	Subarea		Major Road
	Military Lands		Minor Road
			Major Stream
			Lake/Lagoon

OGDEN
■■■■■

Conserved Vegetation Communities in Santee Subarea Plan

FIGURE

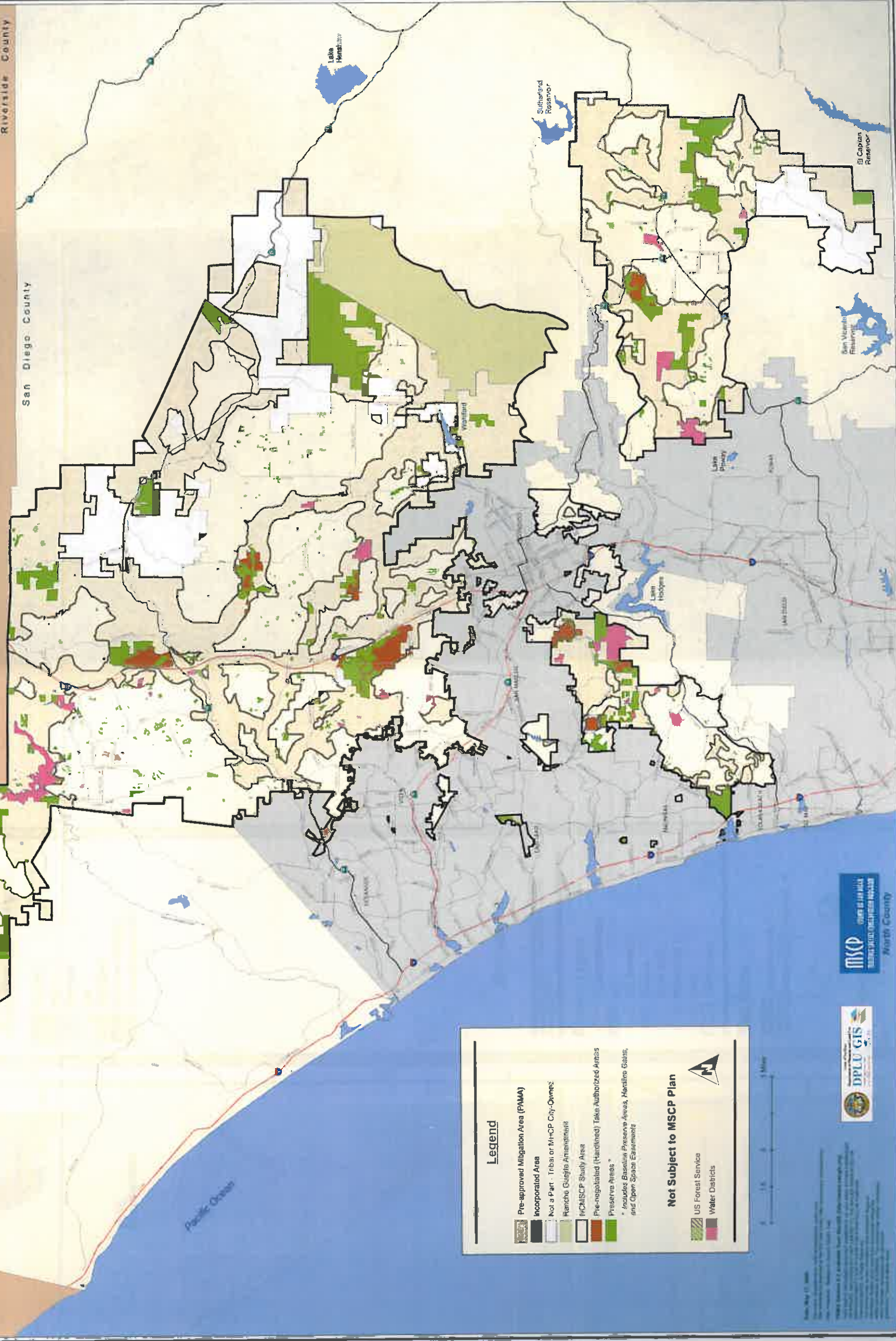
1



Draft North County Multiple Species Conservation Program

Riverside County

San Diego County



Legend

- Pre-approved Mitigation Area (PAMA)
- Incorporated Area
- Not a Part - Tribal or MHP City-Ownes
- Rancho Guejito Anticline
- ICMSCP Study Area
- Pre-negotiated (Handlined) Take Authorized Areas
- Preserve Areas *
- * Includes Baseline Preserve Areas, Maritime Galien, and Open Space Easements

Not Subject to MSCP Plan

- US Forest Service
- Water Districts



0 1.5 3 Miles



Map Date: May 17, 2006
Map Scale: 1 inch = 3 miles
Map Projection: NAD 83 UTM Zone 11N
Map Contour Interval: 100 feet
Map Data Sources: USGS, SDG&W, MWD, etc.
Map Prepared by: DPLU GIS
Map Checked by: [Name]
Map Approved by: [Name]

Figure 1. Development footprint for Campus Park, Meadowood, and Campus Park West projects.

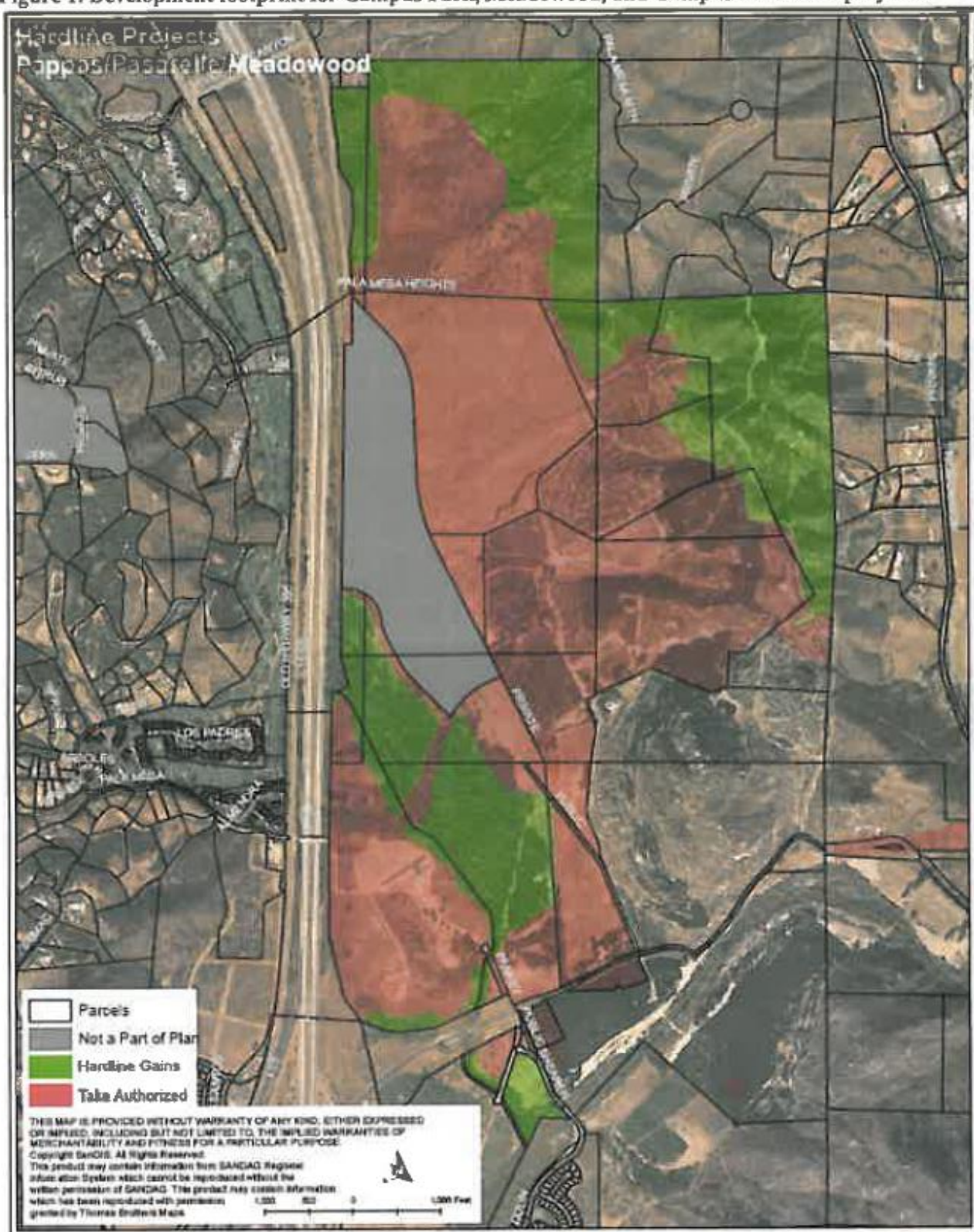


Figure 2. Proposed hard-line development plan for Cielo del Norte.

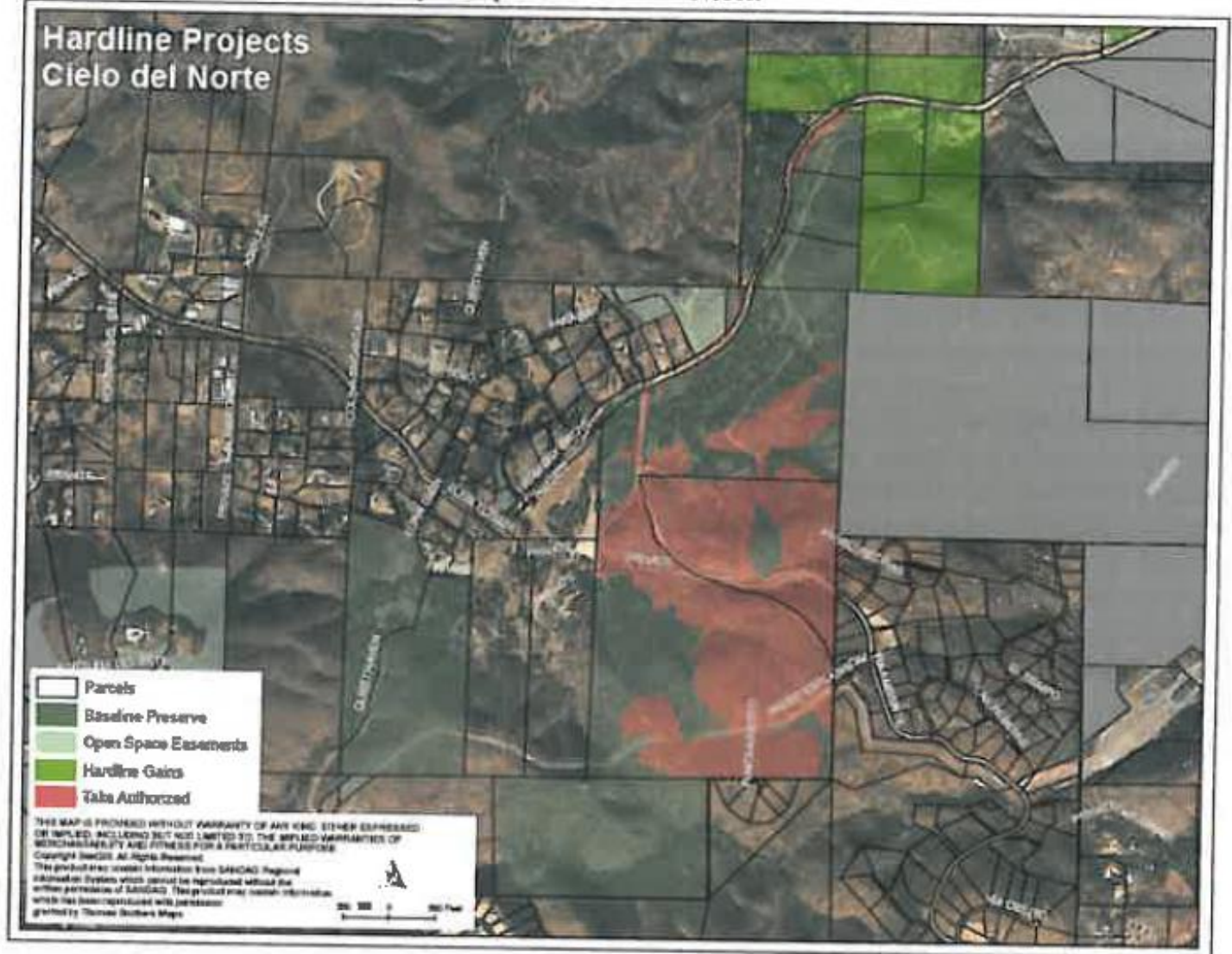


Figure 3. Development footprint of Harmony Grove Village project.

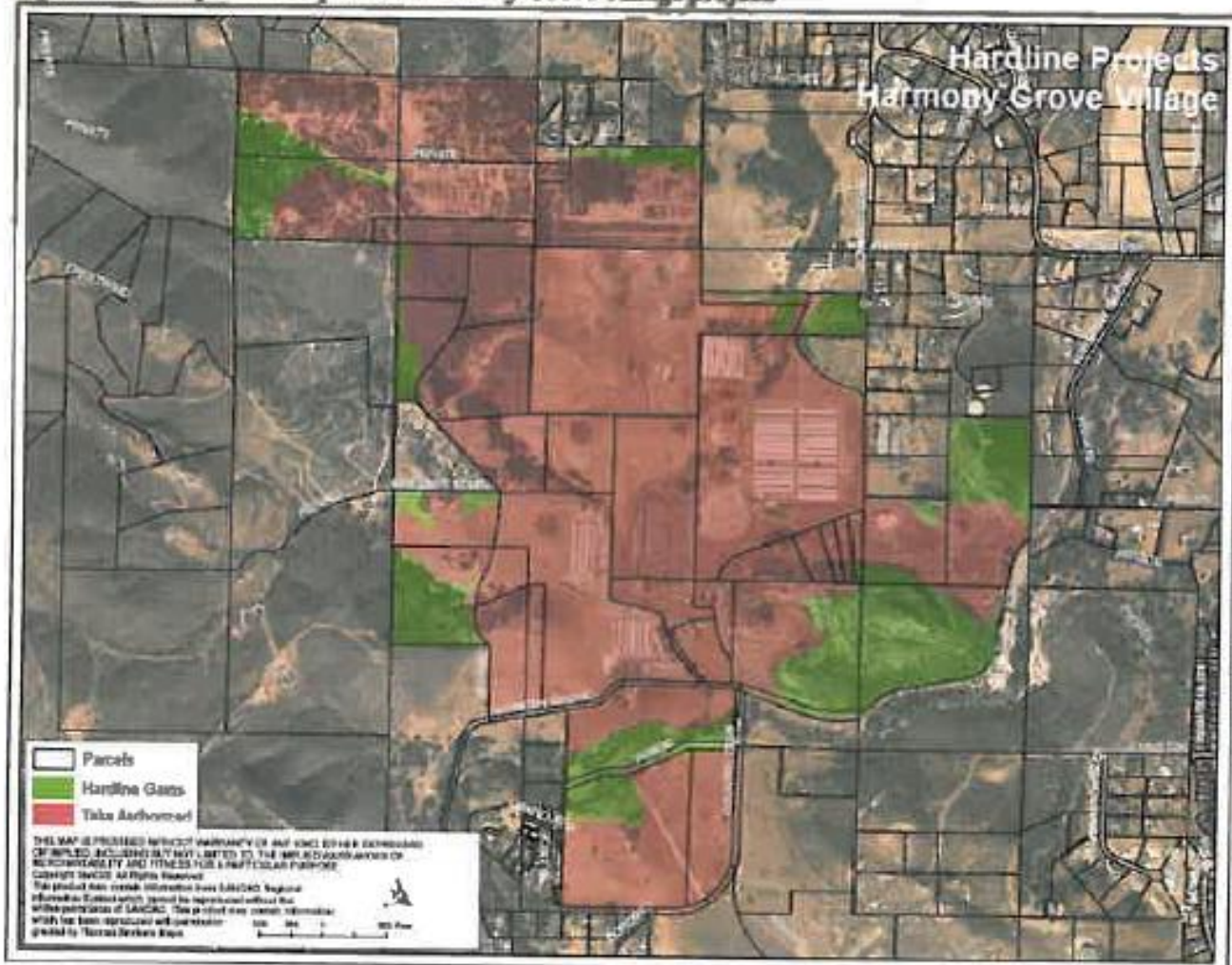


Figure 4. Development footprint for Paradigm Development project.

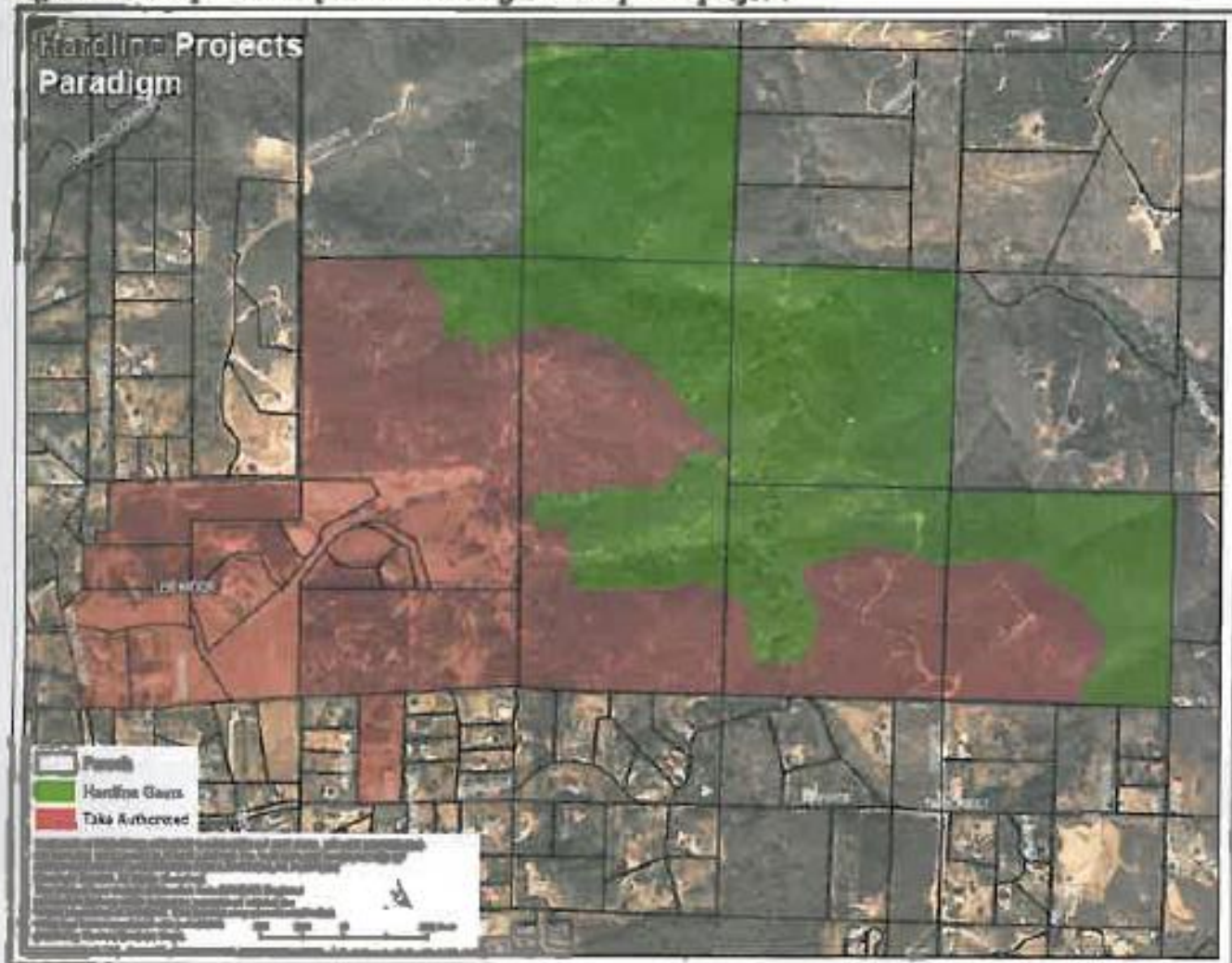


Figure 5. Development footprint for Lilac Ranch project.

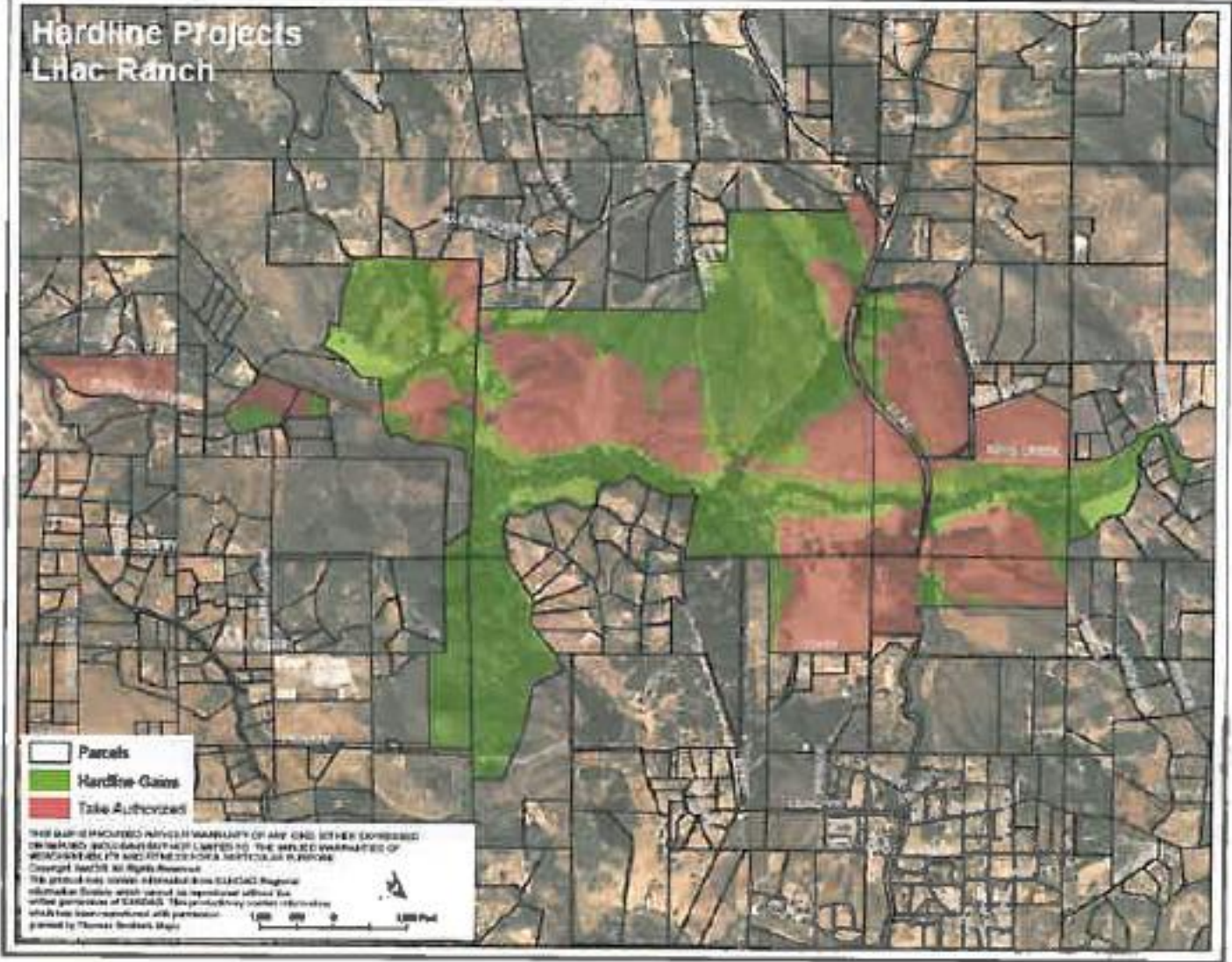


Figure 6. Development footprint for Merriam Mountains project.

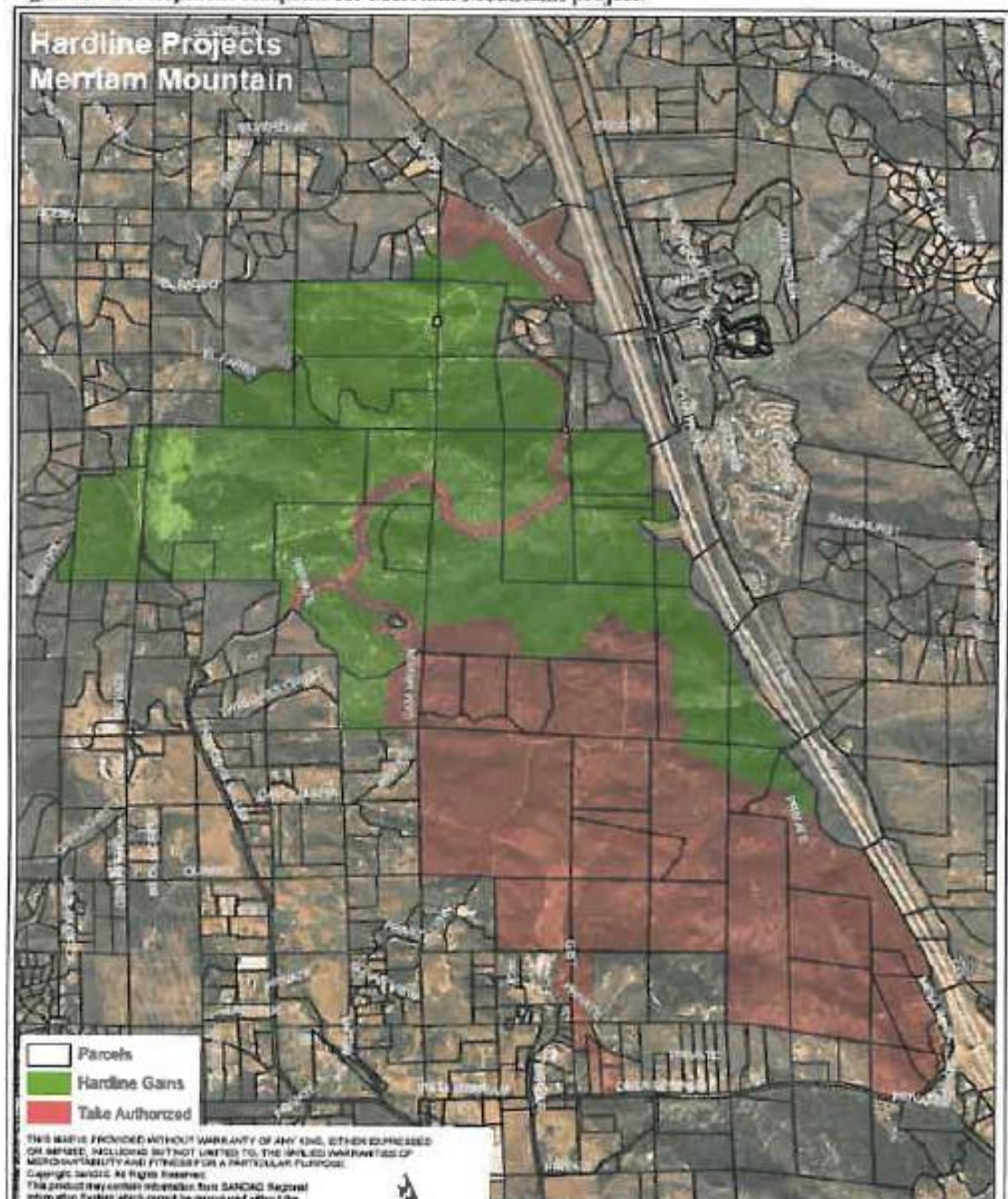


Figure 7. Development footprint for Montecito Ranch project.

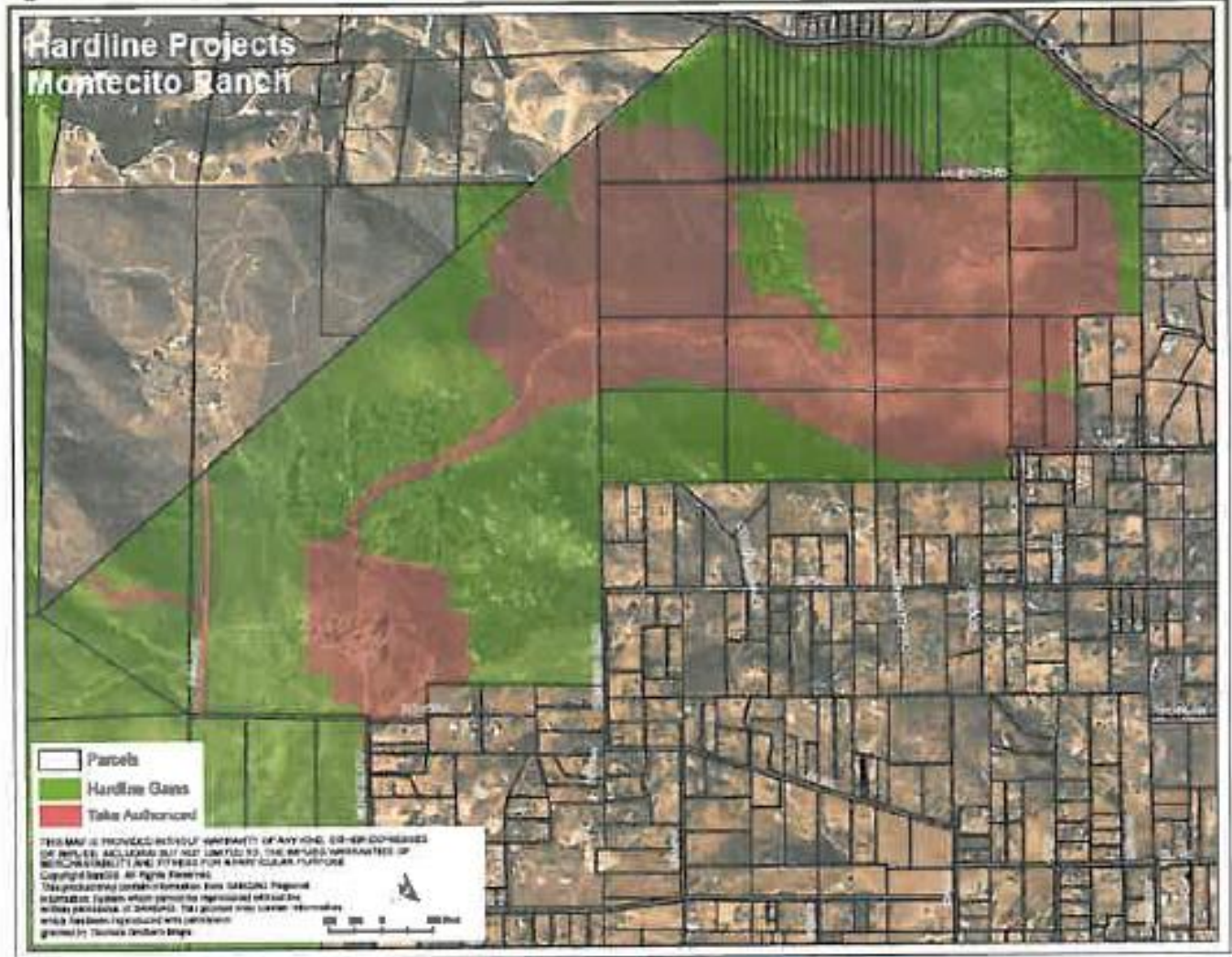
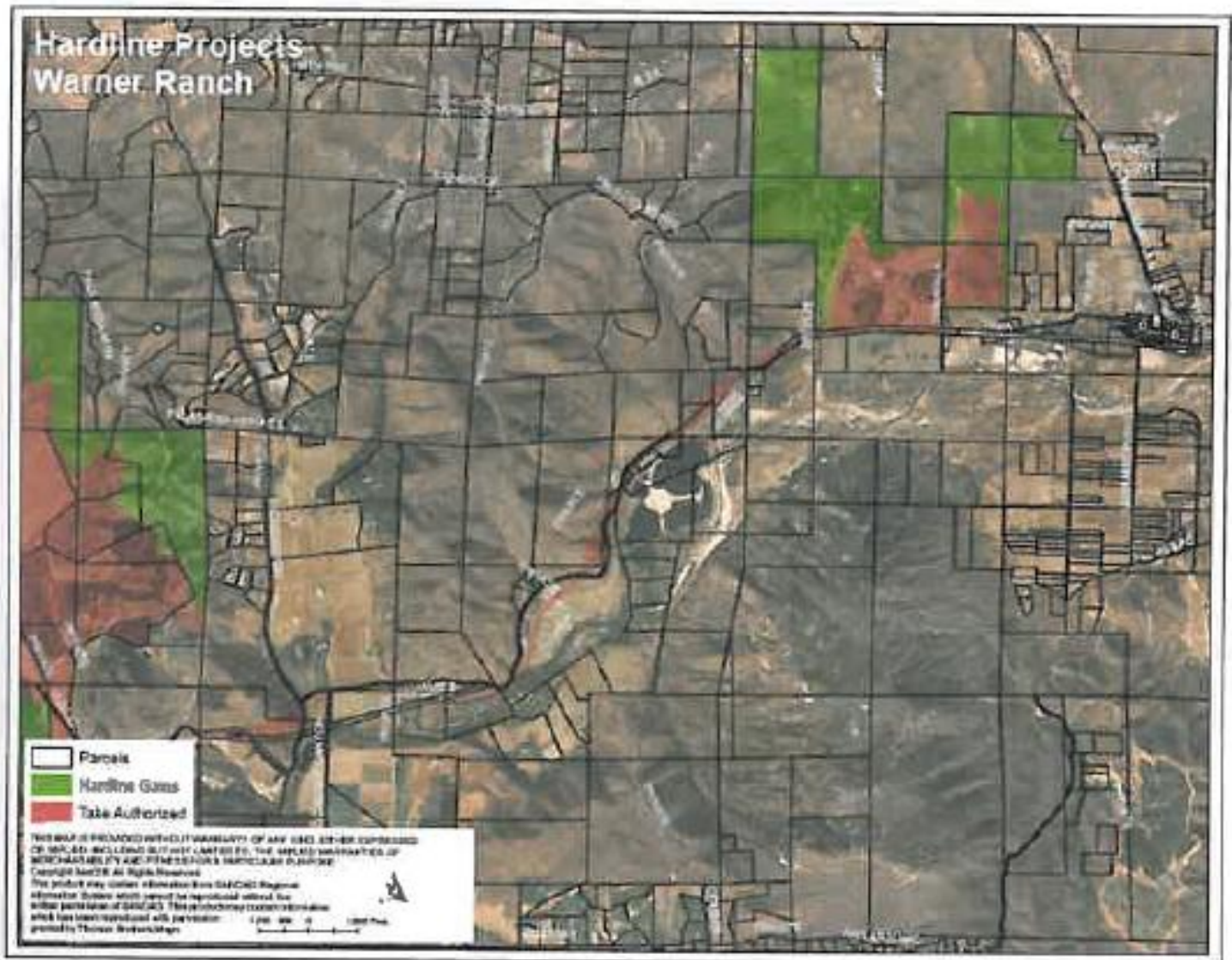


Figure 8. Development footprint for Warner Ranch project.

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.

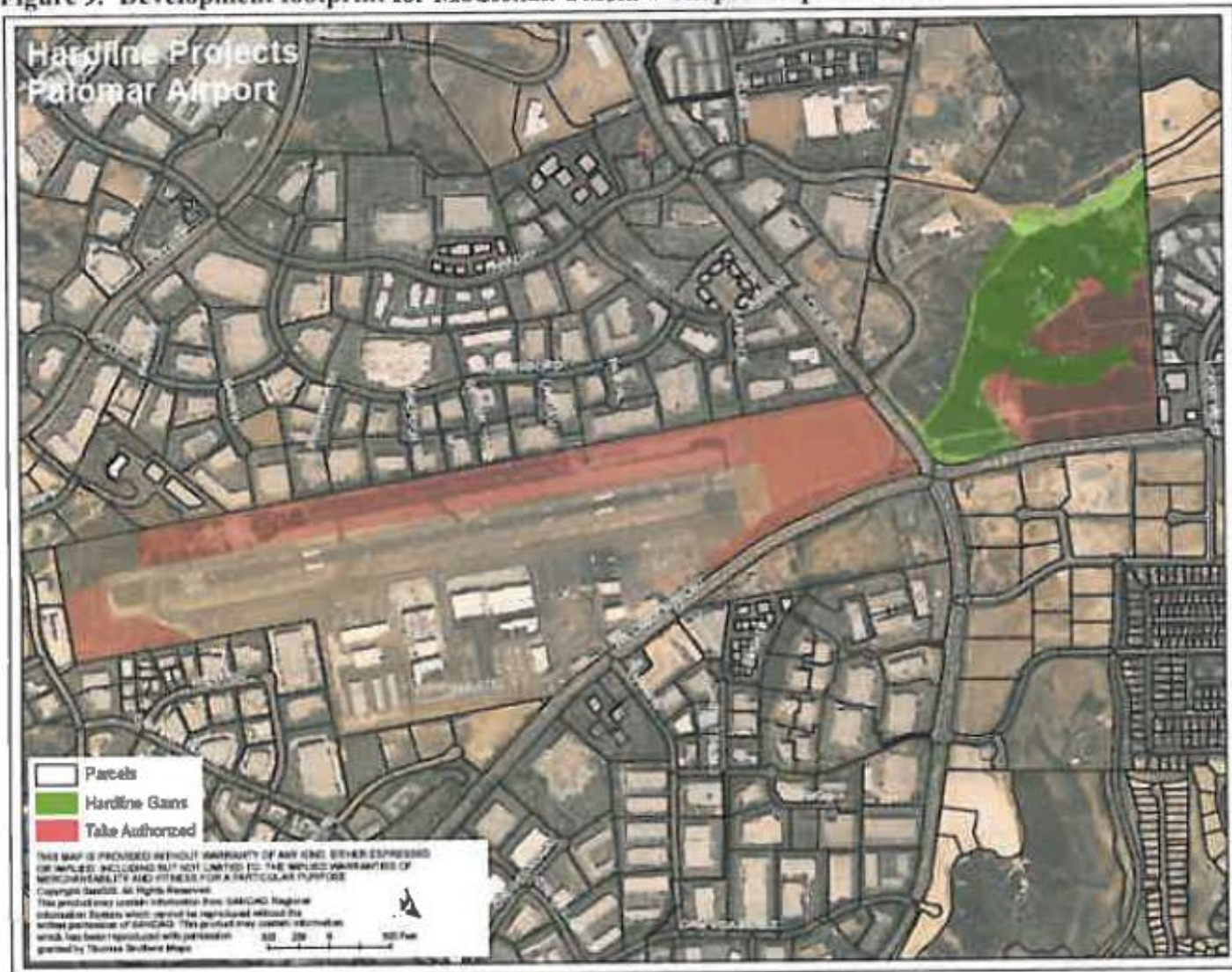


Figure 10. Take-authorized area for San Marcos Landfill, where limited take is authorized by this Plan.



Figure 11. Take-authorized areas on Guajome Regional Park and baseline preserve areas on Guajome Adobe Park.

