

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For Bonita Ace Self-Storage
PDS2016-MUP-16-002
APN 593-050-67-00

September 6, 2018

I. Introduction

The Bonita Ace Self-Storage project proposes to construct a self-storage facility that will include three (3) buildings totaling 140,129 square feet and containing 924 units. The project is proposed to occur on a 4.1-acre property located in Bonita within the southwestern portion of County of San Diego. Specifically, the project site is located southwest of the Sweetwater Reservoir, south of the Sweetwater River and Central Avenue in Bonita, east of the Chula Vista Municipal Golf Course, and southeast of Bonita Road. The 4.1-acre property consists of one parcel (APN 593-050-57-00) that is an in-fill parcel bounded by existing development and a golf course. Off-site road improvements (0.05 acres) are proposed for the access point off of Bonita Road.

The project site is located within the South County Multiple Species Conservation Program (MSCP) Subarea Plan Area. The project site is within the designated Metro-Lakeside-Jamul segment outside of the Pre-Approved Mitigation Area (PAMA). The property is currently occupied by three habitat types: coastal and valley freshwater marsh (0.08 acres), urban/developed land (0.01 acres), and disturbed habitat (4.01 acres). No project impacts are proposed to occur to the coastal valley and freshwater marsh habitat or urban/developed land. The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV), which do not require mitigation per the County's Biological Mitigation Ordinance (BMO).

The coastal and valley freshwater marsh qualifies as a jurisdictional water of the U.S./State under the authority of the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW). The coastal and valley freshwater marsh also qualifies as a County Resource Protection Ordinance (RPO) wetland. The coastal and valley freshwater marsh and a 50-foot wetland buffer will be protected through implementation of a Biological Open Space Easement as shown on the Conceptual Grading Plan dated July 17, 2018.

Based on field surveys conducted on September 14, 2015 and May 27, 2016, no sensitive plant or animal species were detected on-site. Five sensitive plant species were determined to have a high probability of occurring on-site, including San Diego thorn-mint (*Acanthomintha ilicifolia*), Lewis' evening-primrose (*Camissoniopsis lewisii*), long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*), small-flowered morning-glory (*Convolvulus simulans*), and paniculate tarplant (*Deinandra paniculata*). No sensitive animal species were determined to have a high likelihood of occurring on site. There is potential biological impact to nesting birds, which will either be mitigated through breeding season avoidance or a nesting bird survey with specific nest avoidance measures.

There are no unique features on the subject property (i.e. no steep slopes, special soils, etc.). This project site is an in-fill development with no connectivity to adjacent preserves. The Sweetwater River Valley, occurring to the west of the site and passing through the golf course, has been identified as a habitat linkage between the Otay Lakes/Otay Mesa/Otay River Valley

Core Area and the Sweetwater Reservoir/San Miguel Mountain Core Area. Wildlife movement is expected to occur off-site within this wildlife linkage area by mammals, such as coyotes, raccoons, and opossums. It is possible that these mammals could cross under Bonita Road through the existing box culvert into the marsh habitat on the subject property, but there is no place for them to go beyond the on-site marsh. The site is surrounded by development and the upstream, off-site portion of the drainage is a concrete-lined channel with no vegetative cover. Further, any wildlife movement that might occur to and from the golf course to the west would not be inhibited due to the dedication of a Biological Open Space Easement over the wetland and 50-foot wetland buffer.

Table 1. Impacts to Habitat and Required Mitigation¹

Habitat Type	Tier Level	Acres On-site (ac.)	Proposed Impacts (ac.)	Acres Impact Neutral ²	Acres Impacted Off-site ³	Mitigation Ratio ⁴	Required Mitigation
Disturbed Habitat, including non-native woodland	IV	4.01	3.52	0.49	0.05	None	None
Coastal and Valley Freshwater Marsh	I	0.08	None	0.08	None	3:1	None
Urban/Developed Land	None	0.01	None	0.01	None	N/A	N/A
Total:	--	4.10	3.52	0.58	0.05	--	None

The Bonita-Sunnyside Fire Marshal approved a reduction of the Limited Building Zone Easement to 75.5 feet on the northwest corner of the parcel and 85.5 feet on the northeast corner in a letter from the Bonita-Sunnyside Fire Protection District dated July 13, 2018.

The findings contained within this document are based on County records, a staff field visit, and the Biological Resource Letter Report for the Bonita Ace Self-Storage Project dated July 16, 2018 and completed by Gretchen Cummings. 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, CDFW, and U.S. Fish and Wildlife Service (USFWS). 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.

¹ Calculated impacts include those due to grading and off-site improvements.

² The Coastal and Valley Freshwater Marsh (RPO Wetland) and the 50-foot wetland buffer are areas considered impact neutral. An Open Space Easement will be placed over these areas.

³ The acreage amounts impacted off-site are to the Bonita Road shoulder due to access road improvements.

⁴ The mitigation ratios were taken from the San Diego County Biological Mitigation Ordinance (2010) and the County of San Diego Report Format and Content Requirements for Biological Resources document (4th Revision, 2010).

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 Impact Area does not qualify as a BRCA since it does not meet any of the following BRCA criteria:

i. The land is shown as Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.

The project site is not within designated PAMA; therefore the project does not meet this criterion.

ii. The land is located within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species and is adjacent or contiguous to preserved habitat that is within the Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.

The project has been designed to occur entirely within the existing disturbed habitat (3.67 acres of Tier IV habitat) and will occur on an in-fill parcel bounded by development and golf course. The project site is not within an area of habitat known to contain biological resources that support or contribute to the long-term survival of sensitive species and the project site is not adjacent or continuous to preserved habitat, including PAMA; therefore the project does not meet this criterion.

iii. The land is part of a regional linkage/corridor. A regional linkage/corridor is either:

- a. Land that contains topography that serves to allow for the movement of all sizes of wildlife, including large animals on a regional scale; and contains adequate vegetation cover providing visual continuity so as to encourage the use of the corridor by wildlife; or
- b. Land that has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher, MSCP Resource Document Volume II, Appendix A-7 (Attachment I of the BMO.)

The project is an in-fill development with no connectivity to adjacent preserves, nor has it been identified as a regional linkage/corridor. The Sweetwater River Valley, occurring to the west of the site and passing through the golf course, has been identified as a habitat linkage between the Otay Lakes/Otay Mesa/Otay River Valley Core Area and the Sweetwater Reservoir/San Miguel Mountain Core Area. Wildlife movement is expected to occur off-site within this wildlife linkage area by mammals, such as coyotes, raccoons, and opossums. It is possible that these mammals could cross under Bonita Road through the existing box culvert into the marsh habitat on the subject property, but there is no place for them to go beyond the on-site marsh. The site is surrounded by development and the upstream, off-site portion of the drainage is a concrete-lined

channel with no vegetative cover. Further, any wildlife movement that might occur to and from the golf course to the west would not be inhibited due to the dedication of a Biological Open Space Easement over the wetland and 50-foot wetland buffer; therefore the project does not meet this criterion.

- iv. The land is shown on the Habitat Evaluation Map (Attachment J to the BMO) as very high or high and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as BRCA.**

The project site has been identified as “developed” in the Habitat Evaluation Map. The project site is surrounded by existing development and golf course, is mostly disturbed habitat (4.01 acres of 4.1 acres total), and isolated from undeveloped lands. As such, the project does not have high or very high habitat value; therefore, the project does not meet this criterion.

- v. The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of sensitive species.**

The project site is not part of or adjacent to a significant block of habitat. The project site is surrounded by existing development and a golf course, is mostly disturbed habitat (4.01 acres of 4.1 acres total), and isolated from undeveloped lands. As such, the project site is not within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat; therefore the project does not meet this criterion.

- vi. The land contains a high number of sensitive species and is adjacent or contiguous to surrounding undisturbed habitats, or contains soil derived from the following geologic formations which are known to support sensitive species:**
- a. Gabbroic rock;**
 - b. Metavolcanic rock;**
 - c. Clay;**
 - d. Coastal sandstone**

The proposed project contains mostly disturbed habitat (4.01 of 4.1 acres total) and will occur on an in-fill parcel bounded by existing development and a golf course. The project site does not contain a high number of sensitive species and is not adjacent or contiguous with surrounding undisturbed habitats, nor does it contain soils known to support sensitive species; therefore the project does not meet this criterion.

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

The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV), which do not require mitigation per the County’s Biological Mitigation Ordinance (BMO). The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer will be protected by a Biological Open Space Easement as shown on the Conceptual Grading Plan dated July 17, 2018. Therefore this criterion is not applicable.

The open space proposed on-site for this project is solely for purposes of avoiding a sensitive resource. This open space is not considered a Biological Resource Core Area and therefore, is not considered part of the regional MSCP preserve system. The requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan will not 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.

The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV), which do not require mitigation per the County's Biological Mitigation Ordinance (BMO). The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer will be protected by a Biological Open Space Easement as shown on the Conceptual Grading Plan dated July 17, 2018. No sensitive plant or wildlife species were detected during field surveys on September 14, 2015 and May 27, 2016. One narrow endemic plant species, San Diego thorn-mint (*Acanthomintha ilicifolia*), is considered to have a high potential to occur on site. No impacts to critical populations of sensitive plant species, significant populations of narrow endemic animal species, or sensitive plants are anticipated to occur on-site. The project does not propose impacts within a Biological Resource Core Area.

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

The project has been designed to occur entirely within the existing disturbed habitat (3.67 acres of Tier IV). The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer will be protected by a Biological Open Space Easement. Therefore the project is in conformance with this criterion to minimize impacts to habitat.

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

The project has been designed to occur entirely within the existing disturbed habitat (Tier IV) at the southern portion of the site, which is entirely surrounded by existing development. The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer at the northern end of the site, which is adjacent to the golf course, will be protected by a Biological Open Space Easement. Therefore the project is in conformance with this criterion to cluster development.

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.

The project site does not contain steep slopes. Therefore this criterion is not applicable.

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

The project site does not propose to construct roads. Therefore this criterion is not applicable.

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).

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G are required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved on the Subarea Plan Map. The proposed project is not within PAMA and is not in an area designated as Preserve. Therefore, Attachment G does not apply to the project. In addition, Attachment H is not applicable since the site is not part of a regional linkage/corridor

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 coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer at the northern end of the site qualifies as a jurisdictional water of the U.S./State under the authority of the ACOE, RWQCB, and CDFW. The project has been designed to avoid the impacts to the bed and banks of this drainage and a 50-foot wetland buffer through implementation of a Biological Open Space Easement as shown on the Conceptual Grading Plan dated July 17, 2018. The project conforms to this criterion to maintain a no-net-loss-of-wetland standard.

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

The project has been designed to occur entirely within the existing disturbed habitat (3.67 acres of Tier IV habitat). The coastal and valley freshwater marsh (0.08 acres) and 50-foot wetland buffer, which qualify as jurisdictional waters of the U.S./State and RPO wetlands, will be protected by a Biological Open Space Easement. No conserved habitat areas, unique habitats, or habitat features occur onsite. Therefore the project is in conformance with this criterion to maximize the habitat structural diversity of conserved habitat areas.

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 does not propose to impact any sensitive habitat types, nor does the site contain habitats identified as having high or very high biological value according to the MSCP habitat evaluation model. The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer will be protected by a Biological Open Space Easement. Therefore the project is in conformance with this criterion to provide conservation of spatially representative examples of habitats that were ranked as having high and 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 is an in-fill project that has been designed to occur entirely within the existing disturbed habitat (Tier IV) at the southern portion of the site. This area is surrounded by existing development. The coastal and valley freshwater marsh (0.08 acres) and a 50-foot wetland buffer at the northern end of the site, which is adjacent to the golf course, will be protected by a Biological Open Space Easement. Therefore the project is in conformance with this criterion to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

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

The project is an in-fill project that has been designed to occur entirely within the existing disturbed habitat (Tier IV) at the southern portion of the site. The coastal and valley freshwater marsh (0.08 acres) and 50-foot wetland buffer will be protected by a Biological Open Space Easement. Therefore the project is in conformance with this criterion to develop within the least sensitive habitat areas.

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.

The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV). One MSCP covered and narrow endemic plant species, San Diego thorn-mint, is considered to have a high potential to occur on site; however no sensitive plant or wildlife species were detected during field surveys on September 14, 2015 and May 27, 2016. Therefore the project is in conformance with this criterion to conserve regional populations of covered species or representations of sensitive habitats.

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 is an in-fill project that has been designed to occur entirely within the existing disturbed habitat (Tier IV). The site is not part of or adjacent to undeveloped or sensitive habitats. Therefore the project is in conformance with this criterion to conserve large interconnecting habitats that support wide-ranging 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.

The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV). One MSCP covered and narrow endemic plant species, San Diego thorn-mint, is considered to have a high potential to occur on site; however no sensitive plant or wildlife species were detected during field surveys on September 14, 2015 and May 27, 2016. No critical populations as defined in Attachment C of the BMO were detected or are anticipated to occur. Therefore the project is in conformance with this criterion to conserve regional populations of critical populations and narrow endemics.

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

The project is an in-fill project that has been designed to occur entirely within the existing disturbed habitat. The site is outside of designated PAMA and is not considered a BRCA. The project site is not connected to conserved lands, nor is it identified as a regional wildlife linkage/corridor. Therefore the project is in conformance with this criterion to avoid jeopardizing the possible or probably assembly of a preserve system within the Subarea Plan.

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 propose to count on-site preservation as part of its mitigation responsibility. The coastal and valley freshwater marsh (0.08 acres) and 50-foot wetland buffer at the northern end of the site is intended to preserve the existing wetland on site and is considered impact neutral. Edge effects to the Biological Open Space Easement will be reduced through project conditions, which include a Limited Building Zone Easement, fencing, and signage. Therefore the project is in conformance with this criterion to reduce edge effects to onsite mitigation.

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 does not qualify as a Biological Resource Core Area (BRCA). The project will result in on-site and off-site impacts to 3.67 acres of disturbed habitat (Tier IV). The coastal and valley freshwater marsh (0.08 acres) onsite qualifies as a jurisdictional water of the U.S./State under the authority of the ACOE, RWQCB, and CDFW and a County RPO wetland. The coastal and valley freshwater marsh and a 50-foot wetland buffer will be protected by a Biological Open Space Easement as shown on the Conceptual Grading Plan dated July 17, 2018. No sensitive plant or wildlife species were detected during field surveys on September 14, 2015 and May 27, 2016. One MSCP covered and narrow endemic sensitive plant species, San Diego thorn-mint, was determined to have a high probability of occurring on-site; however this species was not observed during field surveys. No sensitive animal species were determined to have a high likelihood of occurring on site. No impacts to critical populations of sensitive plant species, significant populations of narrow endemic animal species, or sensitive plants are anticipated to occur on-site. No unique habitat features have been identified onsite. As an infill project surrounded by existing development and a golf course, the project site has not been identified as a wildlife

linkage/corridor and is not anticipated to facilitate wildlife movement through the site. The project is not part of or adjacent to large undeveloped or conserved lands. Therefore, the project is in conformance with this criterion to avoid impacts to BRCA, to sensitive resources, and to specific sensitive species as defined by the BMO. The project is consistent with the goals of the MSCP.

Kimberly Smith, Planning & Development Services

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MSCP Designation For
 Bonita Ace Self-Storage
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