

**MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For Greenhills Ranch (Phase II)**

PDS2016-SPA-16-001

**APN(s) 395-151-16-00, 395-151-60-00, 395-151-61-00, 395-151-73-00, 395-160-15-00,
398-400-08-00, 398-400-09-00, 398-400-10-00, 398-400-20-00, 398-400-54-00, and 398-
400-55-00**

November 1, 2022

I. Introduction

The proposed project consists of the development of a major subdivision consisting of 63 clustered, single-family residential lots, brush management, a private street system, horse/hiking trail, and dedication of biological open space. Access to the site would be provided by Audubon Road and from a new road off of Lake Jennings Park Road. The project site is located southwest of Lake Jennings, west of Lake Jennings Park Road, north of the intersection of Adlai Road and Audubon Road, and east of Lakeview Road within the unincorporated community of Lakeside in the County of San Diego. The project is located within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP). The project site qualifies as a Biological Resources Core Area (BRCA) and is located within the Pre-Approved Mitigation Area (PAMA).

Biological resources onsite were evaluated in a Biological Resource Report (DUDEK; January 2021) and a Biological Resources Addendum (DUDEK, August 2020). The project site contains 22.00 acres of Diegan coastal sage scrub, 2.86 acres of disturbed Diegan coastal sage scrub, 1.46 acres of Riversidian upland sage scrub, 4.56 acres of disturbed, and 5.32 acres of urban/developed habitat. Sensitive wildlife species identified on the site were coastal California gnatcatcher (*Polioptila californica californica*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and Belding's orange throated whiptail (*Aspidoscelis hyperythra beldingi*). Sensitive plant species identified on the site were San Diego County viguiera (*Bahiopsis laciniata*), San Diego sagewort (*Artemisia palmeri*), and ashy spike-moss (*Selaginella cinerascens*). The project proposes to impact 9.76 acres of Diegan coastal sage scrub, 2.27 acres of disturbed Diegan coastal sage scrub, 0.02 acres of Riversidian upland sage scrub, 4.52 acres of disturbed, 3.42 acres of urban/developed habitat, 87 individuals of San Diego County viguiera (*Bahiopsis laciniata*), and all special status wildlife observed onsite.

Impacts to Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, Riversidian coastal sage scrub, sensitive wildlife species, and sensitive plant species require mitigation. The project proposes to mitigate for the impacts to Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, and Riversidian coastal sage scrub through the dedication of an onsite and offsite open space easement, conserving 19.12 acres of sensitive habitat. Impacts to 87 individuals of San Diego County viguiera (*Bahiopsis laciniata*) will be mitigated through the required habitat-based mitigation.

Impacts to sensitive wildlife will be mitigated through the required habitat-based mitigation and the implementation of breeding season avoidance to ensure project consistency with the Migratory Bird Treaty Act (MBTA).

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Diegan coastal sage scrub	II	22.00	9.76	1.5:1	14.64
Disturbed Diegan coastal sage scrub	II	2.86	2.27	1.5:1	3.41
Riversidian upland sage scrub	II	1.46	0.02	1.5:1	0.03
Disturbed	IV	5.32	4.52	--	--
Urban/Developed	IV	4.56	3.42	--	--
Total:	--	36.20	19.99	--	18.08

The findings contained within this document are based on County records, the Biological Resource Report dated January 2021, prepared by DUDEK, and a Biological Resources Addendum dated August 2020, prepared by DUDEK. 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 proposed impact area qualifies as a Biological Resources Core Area (BRCA) because it is located within the Pre-Approved Mitigation Area (PAMA), is located

within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species, and contains areas ranked as having very high habitat value on the Habitat Evaluation Map.

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

The proposed open space (mitigation site) qualifies as a Biological Resources Core Area (BRCA) because is located within the Pre-Approved Mitigation Area (PAMA), is located within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species, and contains area ranked very high on the Habitat Evaluation Map. As a BRCA, the 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.

The project does not propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), or Narrow Endemic Plant Species (Attachment E). The project does propose impacts to Sensitive Plants (San Diego County Rare Plant List), including 87 individuals of San Diego County viguiera (*Bahiopsis laciniate*) and a BRCA.

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

The project has been designed to occur adjacent to existing residential and commercial development within the southern and eastern portions of the project site. The remaining area onsite, as well as additional areas offsite, will be placed within an open space easement in order to preserve sensitive habitat connected to adjacent preserved habitat offsite. Therefore, the project development has been sited in areas to minimize impact to habitat.

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

Clustering to the maximum extent permitted by County regulations has been considered and implemented in order to achieve avoidance. The project design

includes clustering within the southern and eastern portions of the project site, which is connected to existing residential and commercial development. The remaining area onsite, as well as additional area offsite, will be placed within an open space easement in order to preserve sensitive habitat connected to adjacent preserved habitat offsite.

- 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.**

Project development will be limited to the southern and eastern portions of the project site. The remainder of the site, and additional areas offsite, will be dedicated in an open space easement. As such, encroachment into steep slopes could not be applied to further reduce impacts.

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

Minimum private road standards have been applied to the onsite proposed private roads. No reduction in road standards are necessary.

- 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 proposed project complies with the applicable design criteria in the County MSCP Subarea Plan, including attachment G (Preserve Design Criteria) and attachment H (Design Criteria for Linkages and Corridors), as discussed below.

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. Therefore, no impacts will occur and the project will not conflict with the no-net-loss of wetlands standard.

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

The project proposes development within the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The remaining area onsite, as well as additional areas offsite, will be placed within an open space easement in order to preserve sensitive habitat connected to adjacent preserved habitat offsite. Therefore, the project includes measures to maximize habitat structural diversity of conserved habitat areas, including conservation of 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 proposed project will result in the loss of 9.76 acres of Diegan coastal sage scrub, 2.27 acres of disturbed Diegan coastal sage scrub, 0.02 acres of Riversidian upland sage scrub. The project proposes to place an onsite open space easement over the remaining project area, including 8.88 acres of coastal sage scrub habitat. The project also proposes to conserve 10.23 acres of adjacent coastal sage scrub habitat within an offsite open space easement. Both of these easements will be connected to preserved habitat offsite, containing coastal sage scrub. Therefore, the project provides for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having very high biological value by the MSCP habitat evaluation model.

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 project will preserve 19.12 acres of habitat through an onsite and offsite open space easement, which will be managed in perpetuity. These areas to be conserved are adjacent to preserved habitat located within the Pre-Approved Mitigation Area (PAMA). The development footprint is limited to the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The proposed project design minimizes the area and perimeter of development while maximizing the ratio of surface area to perimeter of conserved habitats. Open space fencing and signage will be installed to prevent disturbance to the open space. Lighting within the

development footprint will be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat. Residents will be required to comply with the County Noise Ordinance and there will be noise limitations during construction.

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

The project proposes development within the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The project will preserve the remaining area onsite, include 8.88 acres of coastal sage scrub, and additional areas offsite, including 10.23 acres of coastal sage scrub. Therefore, the project will develop in the least sensitive habitat areas.

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

The project does not propose impacts to narrow endemic plant species. The project does propose impacts to the coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), a narrow endemic animal species, through the loss of foraging habitat. One coastal cactus wren was observed onsite. However, there are no native cactus patches in the study area and, therefore, there are no impacts to occupied breeding cactus wren habitat. Impacts to this species will be minimized through the preservation of habitat onsite and offsite, totaling 19.12 acres, and breeding season avoidance.

7. Preserve the biological integrity of linkages between BRCAs.

The project site occurs within a BRCA and is located near the Lakeside Linkage. The project was designed to develop within the southern and eastern portions of the project site, adjacent to existing residential and commercial development, and provide open space contiguous with adjacent open space and undeveloped lands and within the PAMA. Through this configuration, the design criteria of the BMO have been met. Specifically, the existing corridor and Lakeside Linkage will be maintained and continue to provide coastal sage scrub habitat for resident wildlife species, as well as cover and topographical relief for species. Therefore, the project will preserve the biological integrity of linkages between BRCAs.

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

There are three MSCP covered species on the project site, the coastal California gnatcatcher, coastal cactus wren, and Belding's orange-throated whiptail. The project proposes to mitigate for impacts to these species through the preservation of habitat onsite and offsite within an open space easement, which will provide for the conservation of sensitive habitat adjacent to other conserved habitats within the Pre-Approved Mitigation Area (PAMA). Therefore, the

proposed projects achieves the conservation goals for covered species and habitats.

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.

The project is located within the Lake Jennings/Wildcat Canyon BRCA and near the Lakeside Linkage. The project is designed to develop within the southern and eastern portions of the project site, adjacent to existing residential and commercial development, and provide open space contiguous with adjacent open space and undeveloped lands and within the PAMA. Through this configuration, the existing corridor and Lakeside Linkage will be maintained.

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

The project is located within the Lake Jennings/Wildcat Canyon BRCA and near the Lakeside Linkage. The majority of resident wildlife species that could utilize this corridor are likely small to mid-size (e.g., birds, rabbits, coyote), the widths of the proposed corridor are wide enough to continue to support these species. Therefore, the existing corridor and Lakeside Linkage will be maintained and continue to provide coastal sage scrub habitat for resident wildlife species, as well as cover and topographical relief for species.

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

The project proposes to conserve 19.12 of coastal sage scrub habitat both onsite and offsite, adjacent to preserved and undeveloped habitat offsite. This will provide cover and topographical relief for species traveling through the Lake Jennings/Wildcat Canyon BRCA and the Lakeside Linkage. Therefore, corridors with good vegetative and topographic cover will be protected.

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 is located within the Lake Jennings/Wildcat Canyon BRCA and near the Lakeside Linkage. The project proposes to develop adjacent to existing residential and commercial development to the east and south of the project site. The remaining are onsite, as well as additional areas offsite, will be preserved in an open space easement. These preserve areas will be located adjacent to

existing and undeveloped preserved areas within the Lake Jennings/Wildlife Canyon BRCA and the Lakeside Linkage. This will accommodate travel for wide range wildlife 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.**

The project is located within the Lake Jennings/Wildcat Canyon BRCA and near the Lakeside Linkage. The majority of resident wildlife species that could utilize this corridor are likely small to mid-size (e.g., birds, rabbits, coyote). Therefore, the widths of the proposed corridor are wide enough to continue to support these species. The project would maintain and enhance existing wildlife corridors and would not create any artificial wildlife corridors. The corridor includes project proposed preserve areas and connects with the other preserve areas that are within the Lakeside Linkage. Since the project is maintaining the existing corridor, there are no pinch points, and the design would allow for the continued wildlife movement and use through the area.

- 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.**

The proposed corridor widths are shown on Figure 7 of the Biological Resource Report (DUDEK, January 2021) and are generally greater than 1,000 feet in all areas, with the exception of a 765-foot long segment that is approximately 580-feet wide. The proposed onsite and offsite open space will be contiguous with other preserves and undeveloped lands. This will allow wildlife to continue to move through the undeveloped habitat similar to the existing conditions.

- 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 proposed project will develop adjacent to existing residential and commercial development. The remaining area onsite, as well as additional areas offsite will be preserved within an open space easement. The development will also be above and set back from the proposed open space so wildlife will not be

able to see the proposed development from the habitat. Therefore, the proposed project will maintain the existing wildlife corridors and would not impact visual continuity.

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

Lighting within the development footprint will be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat. Therefore, no lighting will be cast into the preserve. The project will also be required to comply with the County Light Pollution Code. Residents will be required to comply with the County Noise Ordinance and there will be noise limitations during construction.

- 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.**

The project does not propose any barriers, such as roads, within the corridor. There is an existing dirt road/trail located within the open space preserve, but it will not be improved and will not be used as part of the development. Therefore, this criterion does not apply.

- 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.**

The project does not propose wildlife crossing as part of the project design. Therefore, this criterion does not apply.

- 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 does not propose any impacts to continuous corridors. The project proposes to develop adjacent to existing residential and commercial development. The remaining area onsite, as well as additional areas offsite, will be preserved in an open space easement. These preserved areas will be

located adjacent to existing preserved and undeveloped areas within the Lake Jennings/Wildcat Canyon BRCA and the Lakeside Linkage. Therefore, this criterion does not apply.

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. Therefore, no impacts will occur and the project 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.

The project proposes development within the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The remaining area onsite, as well as additional areas offsite, will be placed within an open space easement in order to preserve sensitive habitat connected to adjacent preserved habitat offsite. Therefore, the project includes measures to maximize habitat structural diversity of conserved habitats areas, including conservation of 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 proposed project will result in the loss of 9.76 acres of Diegan coastal sage scrub, 2.27 acres of disturbed Diegan coastal sage scrub, 0.02 acres of Riversidian upland sage scrub. The project proposes to place an onsite open space easement over the remaining project area, including 8.88 acres of coastal sage scrub habitat. The project also proposes to conserve 10.23 acres of adjacent coastal sage scrub habitat within an offsite open space easement. Both of these easements will be connected to preserved habitat offsite, containing coastal sage scrub. Therefore, the project provides for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having very high biological value by the MSCP habitat evaluation model.

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 project will preserve 19.12 acres of habitat through an onsite and offsite open space easement, which will be managed in perpetuity. These areas to be conserved are adjacent to preserved habitat located within the Pre-Approved Mitigation Area (PAMA). The development footprint is limited to the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The proposed project design minimizes the area and perimeter of development while maximizing the ratio of surface area to perimeter of conserved habitats. Open space fencing and signage will be installed to prevent disturbance to the open space.

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

The project proposes development within the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The project will preserve the remaining area onsite, include 8.88 acres of coastal sage scrub, and additional areas offsite, including 10.23 acres of coastal sage scrub. Therefore, the project provides for the development of 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 site does not contain populations of covered plant species, but does contain populations of covered wildlife species, including the coastal California gnatcatcher, coastal cactus wren, and Belding's orange-throated whiptail. The proposed project provides for the conservation of habitat for these covered wildlife species through the proposed open space, which includes coastal sage scrub habitat adjacent to preserved habitat offsite.

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 proposed project will conserve 19.12 acres of habitat within an onsite and offsite open space easement, which will be managed in perpetuity. The open space connects to preserved areas offsite. This will contribute to the preservation of wide-ranging species such as mule deer, mountain lion, and golden eagle.

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 does not propose impacts to narrow endemic plant species or specified rare and endangered plants. The project does propose impacts to the coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), a narrow endemic animal species, through the loss of foraging habitat. One coastal cactus wren was observed onsite. However, there are no native cactus patches in the study area and, therefore, there are no impacts to occupied breeding cactus wren habitat. Impacts to this species will be minimized through the preservation of habitat onsite and offsite, totaling 19.12 acres, and breeding season avoidance.

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 will contribute to preserve assembly by developing adjacent to existing residential and commercial development and preserving 19.12 acres of habitat, which will be managed in perpetuity. The area to be preserved is adjacent to preserved habitat within the Pre-Approved Mitigation Area (PAMA). Therefore, the proposed project will not jeopardize the possible or probable 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 proposes onsite and offsite open space that connects to preserved habitat offsite. The project includes measures to reduce edge effects, including open space fencing and signage. The applicant will provide for the maintenance and monitoring in perpetuity pursuant to an approved Resource Management Plan (RMP). These provisions will reduce edge effects to onsite and offsite open space.

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

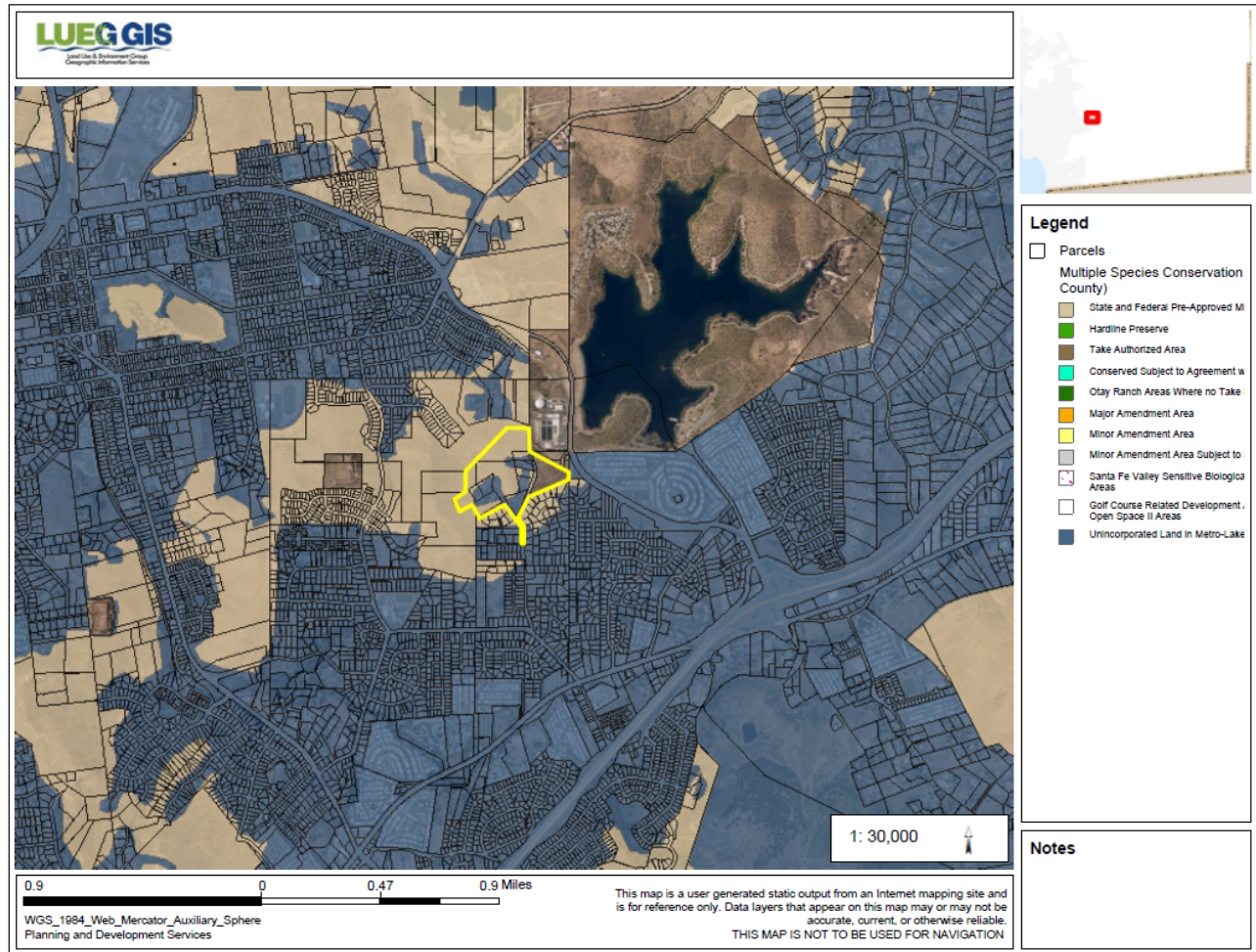
The proposed project site is located within a BRCA and supports sensitive resources. The project proposes development within the southern and eastern portions of the project site, adjacent to existing residential and commercial development. The remaining area onsite, as well as additional areas offsite, will be preserved within an onsite and offsite open space easement. The proposed project also provides for the conservation of habitat for covered wildlife species including the coastal California gnatcatcher, coastal cactus wren, and Belding's orange-throated whiptail. The areas to be preserved in an open space easement include coastal sage scrub ranked as having very high value by the County's habitat evaluation model and totals 19.12 acres. The proposed open space provides conservation meeting or exceeding the required ratio for sensitive habitat types. The proposed open space will be protected by a recorded conservation easement, fencing and signage, and will be managed and monitored in perpetuity by an approved conservancy following an approved RMP, funded by a non-wasting endowment. The Proposed Project is consistent with the goals of the MSCP.

Therefore, the proposed project has made every effort to avoid impacts to BRCAs, sensitive resources, and sensitive species as defined in the BMO.

Kendalyn White, Planning & Development Services

November 18, 2020

Multiple Species Conservation program (MSCP) Designation



South County MSCP Core Linkage Area

