

**MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT**  
**For Fitch Los Coches Tentative Parcel Map**  
**PDS2023-TPM-21331**  
**APN(s) 397-060-79-00**

**April 15, 2026**

**I. Introduction**

The project proposes to subdivide the 2.7-acre parcel into three new parcels measuring 0.9 acres (Parcel 1), 1.3 acres (Parcel 2), and 0.5 acres (Parcel 3). Parcel 2 is currently developed with an existing single-family residence. The project site is located at 9011 Los Coches Road in the Lakeside Community Planning Area, within unincorporated San Diego County. Access to the site would be provided by private driveways connecting to Los Coches Road. The project is located within the Metro-Lakeside-Jamul Segment of the County’s Multiple Species Conservation Program (MSCP).

Biological resources on the site were evaluated in a Biological Resources Letter Report (Vince Scheidt, April 2026). The site contains 0.3 acre of non-native grassland, 0.6-acre coast live oak woodland, 0.45-acre disturbed wetland, and 1.3 acres of disturbed/developed habitat. The northern portion of the project site contains a Resource Protection Ordinance (RPO) wetland. One special status plant species, Campo clarkia (*Clarkia delicata*) was detected on the project site. Sensitive wildlife species identified on site include Belding’s orange throated whiptail (*Cnemidophorus hyperythrus beldingi*), Monarch butterfly (*Danaus plexippus*), and red-shouldered hawk (*Buteo lineatus*). The project will impact 0.4 acre of coast live oak woodland, 0.2 acres of oak root protection zone, and 1.2 acre of disturbed/developed habitat. The project does not propose impacts to any non-native grassland, disturbed wetland, or 0.2 acre of coast live oak woodland habitat. These remaining areas will be preserved within an open space easement, as they are associated with the RPO wetland onsite.

Impacts to biological resources will require mitigation. The County’s RPO requires that RPO wetlands, and associated buffers, be placed within an open space easement. A limited building zone (LBZ) easement, open space fencing, and open space signage will also be applied to the project design to prevent encroachment into the open space easement. Mitigation for impacts to 0.4 acre of coast live oak woodland habitat and 0.2 acre oak root protection zone will occur through purchase of 1.2 acre of tier I credits at a County approved mitigation bank. Breeding season avoidance will also be implemented 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
Disturbed/Developed	IV	1.3	1.2	--	0.0
Non-Native Grassland	III	0.3	0.0	0.5:1	0.0
Coast Live Oak Woodland	I	0.6	0.4 (0.2)*	2:1	1.2

Disturbed Wetland	I	0.45	0.0	2:1	0.0
<b>Total:</b>	--	2.65	1.8	--	1.2

\*Impacts to oak root protection zone within the disturbed/developed habitat total 0.2 acre.

The findings contained within this document are based on County records and the Biological Resource Letter Report (Vince Scheidt, April 2026). 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 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 land is not shown as Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map. The land is within the Metro-Lakeside-Jamul segment. Therefore, this criterion does not apply.

#### 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.

While the land does contain biological resources, it is limited and isolated as the site is surrounded by development. The site is also located outside of the Pre-Approved Mitigation Area (PAMA). Therefore, this criterion does not apply.

- 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 land is not part of a regional linkage corridor. Therefore, this criterion does not apply.

- 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 land is shown as developed and very high on the Habitat Evaluation Map. However, it does not link significant blocks of habitat as the site is surrounded by existing development. The area shown as very high includes the RPO wetland that will be preserved within an open space easement and will not be impacted. Therefore, this criterion does not apply.

- 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.**

As the site is surrounded by development, it does not consist of or is within a block of habitat greater than 500 acres in area. Therefore, this criterion does not apply.

- 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 land does not contain a high number of sensitive species and is not adjacent or contiguous to surrounding undisturbed habitat. Soils on the site include Vista coarse sandy loam, 15 to 30 percent slopes (VsE) and Tujunga sand (TuB), 0 to 5 percent slopes. These soils are not known to contain a high number of sensitive species. Therefore, this criterion does not apply.

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

The open space proposed on the project site is for protection of the RPO wetland and RPO wetland buffer. As this open space is only for avoidance and not considered a Biological Resource Core Area, it 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.

Mitigation for impacts to 0.4 acre of coast live oak woodland and 0.2-acre oak root protection zone will be mitigated through the purchase of 1.2-acre credits at a County approved mitigation bank, within a BRCA in the MSCP.

**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.**

The project includes protection of the RPO wetland located onsite through placement of a biological open space easement. While this area is not intended to serve as project mitigation of biological impacts, it will protect sensitive habitat areas from future development. The majority of impacts have been sited in disturbed/developed areas.

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

As the project site contains and is surrounded by existing development, onsite preservation is not suitable. Though, the project has been designed to avoid the RPO wetland located on the site, which will be preserved within an open space easement. Therefore, clustering development would not be applicable as a means of achieving 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.**

Steep slopes are not located on the project site. Therefore, encroachment into steep slopes is not applicable.

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

The minimum private road standards have been applied to the onsite proposed private roads and 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 project is not located within the PAMA or areas designated as Preserved and is not located within a regional linkage and/corridor. Therefore, the criterion identified in Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors) do not apply.

#### **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.

The project is not located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map. Therefore, the Preserve Design Criteria from Attachment G does not apply.

#### **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:

The project site is not located within a regional linkage or corridor. Therefore, the Design Criteria for Linkages and Corridors from Attachment H 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.**

Los Coches Creek, a state and federal jurisdictional water, runs through the northwestern portion of the site. This area also qualifies as an RPO wetland. The feature will be preserved within an open space easement and no impacts are proposed. Therefore, 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 to place the RPO wetland and RPO wetland buffer, which contains all the non-native grassland and disturbed wetland habitat onsite within an open space easement. As the site is surrounded by residential development and contains an existing single-family home, onsite preservation is not suitable. Impacts to coast live oak woodland and oak root protection zone will be mitigated through purchase of credits at a County approved mitigation bank, which will contribute to the preserve system. Therefore, the project includes measures to conserve unique habitats 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 does not contain coastal sage scrub habitat. Habitats ranked as having very high biological values will be preserved within an open space easement. Therefore, the project provides for the conservation of habitat types that were ranked as having very high biological values.

**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 place the RPO wetland and RPO wetland buffer, which contains all the non-native grassland and disturbed wetland habitat onsite within an open space easement. This open space will be protected with the implementation of a limited LBZ easement, open space fencing, and open space signage. The easement will be adjacent to existing open space to the northeast of the project site, which contains habitat ranked as very high habitat value.

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

The project proposes to place the RPO wetland and RPO wetland buffer, which contains all the non-native grassland and disturbed wetland habitat onsite within an

open space easement. The majority of impacts will occur to disturbed/developed habitat and impacts to 0.4 acre of coast live oak woodland and 0.2 acre oak root protection zone will be mitigated through purchase of credits at a County approved mitigation bank.

**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 threatened, endangered, or narrow endemic species. Developing the site will not eliminate highly sensitive habitat or impact key populations of covered 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.**

No wide-ranging species are expected to occur onsite. However, the open space onsite provides foraging and nesting habitat for some species. This open space can assist with connecting undeveloped land also ranked as having very high biological value to the northeast.

**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.**

No critical or narrow endemic species were detected on the site.

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

The project site is not within an area of regional significance with regard to conservation of sensitive species and habitats. The site is not part of or adjacent to large interconnecting blocks of habitat, lands identified as PAMA or Preserve, or other sensitive resources. The surrounding development does not aid in conservation or wildlife dispersal. Therefore, developing the site will not hinder possible preserve systems.

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

While the project proposes to place the RPO wetland and RPO wetland buffer within an open space easement, this area will not count towards mitigation. The project

design includes a LBZ easement, open space fencing, and open space signage to reduce edge effects on the open space in order to reduce edge effects.

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

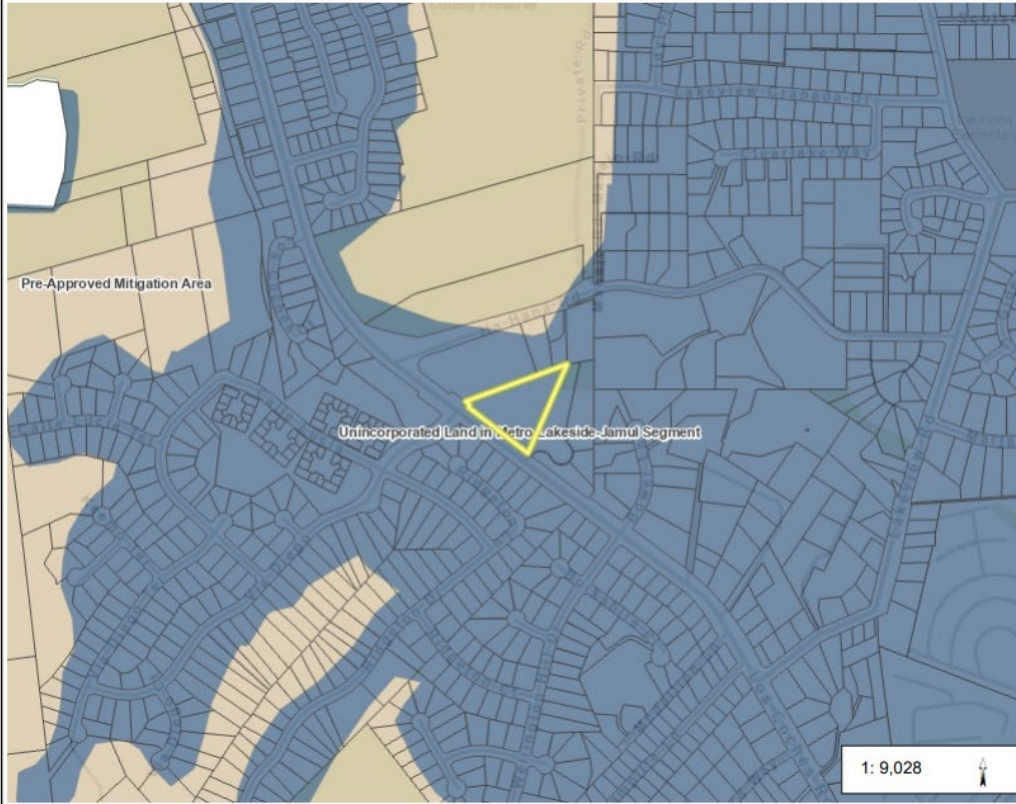
The project development would limit impacts to disturbed/developed habitat and 0.2 acre of coast live oak woodland habitat. The project proposes to place the RPO wetland and RPO wetland buffer, which contains all the non-native grassland and disturbed wetland habitat onsite, as well as an additional 0.4 acres of coast live oak woodland habitat within an open space easement. This area is ranked as having very high habitat value. Therefore, every effort has been made to avoid impacts to BRCAs, sensitive resources, and to specific sensitive species as defined in the BMO.

The project site does not qualify as a BRCA. Due to the surrounding development, the project site is suitable for development with the incorporation of mitigation measures. Mitigation measures will include the onsite preservation of the RPO wetland and RPO wetland buffer, offsite preservation of Tier I habitat within a BRCA in the MSCP, and breeding season avoidance. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined by the BMO.

Kendalyn White, Planning & Development Services

April 15, 2026

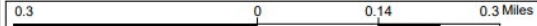
# MSCP Designation



**Legend**

- Parcels
- Multiple Species Conservation County)
  - State and Federal Pre-Approved M
  - Hardline Preserve
  - Take Authorized Area
  - Conserved Subject to Agreement w
  - Otay Ranch Areas Where no Take
  - Major Amendment Area
  - Minor Amendment Area
  - Minor Amendment Area Subject to
  - Santa Fe Valley Sensitive Biological Areas
  - Golf Course Related Development / Open Space II Areas
  - Unincorporated Land in Metro-Lake

1: 9,028



WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
Planning and Development Services

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.  
**THIS MAP IS NOT TO BE USED FOR NAVIGATION**

**Notes**