



Memorandum

To: Kelly Bray, County of San Diego Planning and Development Services (PDS)
Stephanie Neal, County of San Diego PDS

From: Patrick Atchison, ICF
Scott Fleury, ICF
Markus Spiegelberg, ICF

Date: December 1, 2022

Re: Tasks Accomplished to Date on the North County MSCP Plan Development

Background

On October 28, 2020, the County Board of Supervisors reaffirmed the County's commitment to preparing the North County Plan (Plan) as a federal Habitat Conservation Plan and State Natural Communities Conservation Plan (HCP/NCCP) and provided direction on the Options Assessment. In December 2020 the County revised and amended the [Planning Agreement](#) with the Wildlife Agencies to complete the North County Plan, which included an estimated schedule for major milestones to track progress of the Plan development. Although Exhibit G, Milestone to Demonstrate Progress within the Planning Agreement was negotiated and agreed to in June 2020, the Planning Agreement was not signed until March 2021. During that 9-month timeframe, it was known that the milestones would likely change but all parties agreed to proceed with the drafted Planning Agreement to reinstate work as soon as possible. In addition, not all the tasks needed to complete the plan were included as milestones, so progress has been difficult to track. The timeframe to completion of the North County Plan remains in alignment with the information communicated to the Board on October 28, 2020, although different than the Planning Agreement, which outlined an anticipated adoption of FY 25/26 for Option 5: Revised HCP/NCCP North County Plan.

Work on the North County Plan continues to progress, but a number of complex topics have arisen that have required additional research and focused discussion to ensure they are fully addressed in the Plan. The most significant topics to be addressed have been (1) resolution of the set of Covered Species to be addressed in the Plan and (2) revision of the forecasted development within the Plan Area and its implications for preserve design. Ongoing work to address these two topics fully has resulted in the Plan no longer being in sync with the milestone schedule in Planning Agreement. The purpose of this memo is to summarize the tasks and work items that the County and ICF (the County's consultant supporting Plan completion) have been working on to complete the Plan and to demonstrate progress and the County's commitment to complete a final North County Plan, in collaboration with the United States Fish and Wildlife Service and the California Department of Fish and Wildlife. Attachment A is an updated milestone schedule with estimated timeframes to develop the remaining Plan components, conduct focused outreach with stakeholders and the public, draft the associated CEQA/NEPA documents, and ultimately present the North County Plan to decision-makers for adoption.

Summary of Effort towards Plan Preparation to Date

Since work on the North County Plan was reinitiated in March 2021, the following tasks and work items have been completed:

Board Direction as Outlined in Options Assessment

- ***Plan Area Adjustment***
 - Removed Rancho Guejito from the Plan Area.
 - Evaluated multiple options for Plan Area changes to include more areas to the east.
 - Reached a consensus on an updated draft Plan Area boundary that doubled the size of the Plan Area.
- ***Development of Draft Preserve Design Map***
 - Merged previous Pre-Approved Mitigation Areas (PAMA) boundaries from the old North County boundary and Focused Planning Areas (FPA) boundaries from the East County portion of the new Plan Area to create an updated draft Priority Conservation Area (PCA) to represent the preserve design.
 - Updates to PCA and preserve design map using updated ownership and land protection status data.
 - Revised the preserve design map to adjust category titles and define assumptions.
 - Made revisions to the PCA boundaries to remove developed areas and highly parcelized areas where conservation would be more challenging.
- ***Updates to Covered Species List***
 - Researched and collected information on changes to the Covered Species list based on changes to the Plan Area and current species listing status.
 - Prepared memo describing the criteria and process for developing recommendations for the Covered Species list.
 - Reviewed the Covered Species list changes with the Wildlife Agencies and environmental group stakeholders.

Best Available Data/Conservation Concepts

- ***Pending Projects***
 - Researched and collected information on current pending projects.
 - Incorporated new pending projects data into the draft preserve design map.
- ***Impact/Conservation Analysis***
 - Updated forecasted development model to account for updated draft Plan Area and legislation affecting housing forecasts.
 - Reviewed updated conservation analysis with Wildlife Agencies to receive feedback and discuss next steps.
- ***Preserve Assembly Methods***
 - Researched and presented methods for an in-lieu fee process for preserve assembly.
 - Hosted meeting with other HCP/NCCP permittees from across California to share their insights on the utilization of a fee-based approach.

- ***Independent Science Advisory Input***
 - Conducted meetings and communications with species experts to collect best available information on species suitable habitat, threats and stressors, and management methods.
 - Species addressed included:
 - Stephen's kangaroo rat
 - Mountain lion
 - Southwestern willow flycatcher
 - Yellow-billed cuckoo
 - Developed or updated models of species suitable habitat for:
 - Mojave tarplant
 - Bald eagle
 - Golden eagle
 - Southwestern willow flycatcher
 - Cactus wren
 - California red-legged frog
 - Stephens' kangaroo rat

Draft North County Plan

- ***Stakeholder and Public Engagement***
 - Held several meetings with stakeholders and the public in Fall/Winter 2021 to discuss the draft Plan Area boundary, draft Covered Species list, and draft Preserve Map.
- ***Plan Preparation***
 - Reorganized and reformatted the previous 2017 draft of the North County Plan based on ICF input and review as recommended in the Options Assessment.
 - Developed Draft Chapters for County review
 - Chapter 1. Introduction
 - Chapter 2. Setting and Biological Resources
 - Chapter 3. Covered Activities
 - Chapter 5. Conservation Strategy (partial)
 - Developed Draft Appendices for County review
 - Appendix A. Natural Communities
 - Appendix B. Species Profiles
 - Appendix C. Pending Projects
 - Appendix D. Existing Protected Areas and Non-MSCP Natural Areas
 - Appendix E. Planning Unit Descriptions
 - Appendix F. Summary Biological Goals, Objectives and Avoidance and Minimization Measures
 - Appendix G. Climate Change Analysis
- ***Wildlife Agency Communications***
 - Continued participation in monthly Wildlife Agencies meetings to discuss Plan development options and topics.

Key Topics Moving Forward

The County and ICF are continuing to address the following key topics:

- 1. Expanded Covered Species List to Address Indicator Species**
 - a. Per input from stakeholders, the County and ICF will complete a ‘data-driven’ approach to evaluate the Covered Species list using an additional criterion for natural community and connectivity indicator species.
 - b. Evaluate and estimate the additional management and monitoring cost and mitigation implications for additional Covered Species.
- 2. Develop Species Goals and Objectives**
- 3. Match Conservation Strategy with Forecasted Development**
 - a. County and ICF will collaborate with the Wildlife Agencies and stakeholders to revisit and redefine the Plan’s conservation strategy to be balanced with the County’s updated forecasted development. This may include various options from changes to the Preserve Map to new methods of collecting mitigation funds for the buildout of the preserve.

These key topics will be addressed in collaboration with the Wildlife Agencies through the Fall of 2022 and ready to reach resolution by the first quarter of 2023.

ATTACHMENTS

Attachment A – North County Plan Estimated Milestone Timeline

Attachment B – United States Fish and Wildlife Service and California Department of Fish and Wildlife Joint Letter of Acknowledgement of Progress to Date on the North County Plan

Attachment A – North County Plan Estimated Milestone Timeline

Date	Milestone
Fall/Winter 2022	Team Develops Covered Activities in Collaboration with Wildlife Agencies
Spring 2023	Consultant & Staff Facilitated Outreach on Covered Activities
Winter/Spring 2023	Team Develops Conservation Strategy in Collaboration with Wildlife Agencies
Spring 2023	Team Develops CEQA/NEPA Notice of Preparation & Scoping Documentation
Summer 2023	Consultant & Staff Facilitated Outreach on Conservation Strategy & CEQA/NEPA Notice of Preparation
Spring & Summer 2023	Team Develops Implementation Structure in Collaboration with Wildlife Agencies
Fall 2023	Team Develops Implementation Documents (FRMP, BMO, IA) in Collaboration with Wildlife Agencies, County Receives Administrative Draft North County Plan
Winter 2023	County Receives Draft Implementation Documents & 1st Screencheck CEQA/NEPA Documents
Spring 2024	Consultant & Staff Facilitated Outreach on Implementation Documents
Spring 2024	Wildlife Agencies Receive Administrative Draft North County Plan & County Receives 2 nd Screencheck CEQA/NEPA Documents
Summer 2024	Wildlife Agencies Receive Administrative Draft CEQA/NEPA Documents
Summer 2024	Planning Commission (Informational Item)*
Summer 2024	Board Update (Summary of Public Review Materials)*
Fall 2024	Public Draft North County Plan & EIR/EIS Released for 60-Day Review Period, includes Consultant & Staff Facilitated Outreach
Late Fall 2024 – Summer 2025	Respond to Comments and Prepare Final Draft Documents
Fall 2025	Final North County Plan Documents Posted
Fall 2025	Planning Commission Hearing*
Fall/Winter 2025	Board Adoption*

*Public Hearings

**Attachment B – Joint Letter of Acknowledgement of Progress to Date
on the North County Plan**



U.S. FISH AND WILDLIFE SERVICE
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF
FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, California 92123

In Reply Refer to:
FWS-SD-23-0025915-HCP-001

December 16, 2022
Sent Electronically

Kelly Bray
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Joint Letter of Acknowledgement of Progress to Date on the North County Plan

Dear Kelly Bray:

The United States Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively the Wildlife Agencies, have reviewed the memorandum prepared by ICF International dated December 1, 2022. This memorandum accurately summarizes the tasks that have been completed to date regarding preparation of the North County Multiple Species Conservation Program Plan (North County Plan). These tasks include adjustments to the Plan Area, development of a draft preserve design map, updates to the covered species list, creation of an impact/conservation analysis, research of preserve assembly methods, and increased engagement with stakeholders and the public.

The Wildlife Agencies and the County of San Diego (County) signed the third restated and amended Planning Agreement for the North and East County Multiple Species Conservation Program Plans (Planning Agreement) on March 22, 2021. The Planning Agreement details the planning goals, plan preparation standards, interim processes, and other important provisions necessary for the preparation of the North County Plan. Exhibit G of the Planning Agreement includes milestones to demonstrate progress along with targeted dates for completion. Through this letter we support the updated estimated milestone timeline included in Attachment A of the memorandum and affirm that this will update Exhibit G of the Planning Agreement.


We are committed to collaborating with the County to help realize a finalized North County Plan that balances the needs of our local sensitive species with public services. We appreciate the work that the County and ICF International staff have put into the North County Plan development and look forward to building on the momentum that has been established.

If you have any questions regarding this response letter, please contact [Susan Wynn](#)¹ from the Service or [Karen Drewe](#)² from the Department over electronic mail.

Sincerely,

JONATHAN SNYDER
Digitally signed by
JONATHAN SNYDER
Date: 2022.12.16
16:37:37 -08'00'

Jonathan D. Snyder
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