

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT For

Secure Space Self-Storage-Bonita
APN(s) 586-050-48-00, 586-050-36-00, 586-050-44-00

May 29, 2024

I. Introduction

The project proposes to develop a 10.74-acre site with a 980-unit, 130,200 square foot storage facility and a 1,000 square foot leasing office and will include 109 covered recreational vehicle (RV) parking spaces and 21 standard passenger vehicle parking spaces for customers and employees. Additionally, the project proposes to develop and enhance the trails system at the boundary of the development for public benefit. The project includes the dedication of a biological open space easement over 1.97 acres located in the northern portion of the project site. The project site consists of three parcels in the unincorporated community of Bonita-Sunnyside in San Diego County. It is situated just east of Quarry Road at the intersection with Sweetwater Road, approximately 0.33 mile south of the State Route (SR)-125/SR-54 interchange. It is within the Metro-Lakeside-Jamul Segment of the County's Multiple Species Conservation Program (MSCP). The site does not qualify as Biological Resource Core Area (BRCA) and is not located with or adjacent to any Pre-Approved Mitigation Areas (PAMA).

Biological resources on the site were evaluated in a Biological Resources Letter Report (RECON Environmental Inc; May 28, 2024). The site contains 0.94-acre Diegan coastal sage scrub, 8.34 acres of non-native grassland, 0.29 acre of non-native vegetation, 0.55 acre of disturbed, 0.06 acre of Arundo-dominated riparian, and 0.56 acre of urban/developed habitat. Three special status plant species were detected during the biological survey – California adolphia (*Adolphia californica*) was found onsite and San Diego County viguiera (*Bahiopsis laciniata*) and singlewhorl burrobush (*Ambrosia monogyra*) were found offsite in the 100-foot offsite survey buffer. Two sensitive wildlife species were detected during the biological survey – coastal California gnatcatcher (*Poliophtila californica californica*) was found on site and least Bell's vireo (*Vireo bellii pusillus*) was detected in the 100-foot offsite survey buffer. Four sensitive wildlife species have moderate potential to occur on-site: Crotch's bumblebee (*Bombus crotchii*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), red diamond rattlesnake (*Crotalus ruber*), and San Diego black tailed jackrabbit (*Lepus californicus bennettii*).

The project will impact 0.94 acre of Diegan coastal sage scrub, 6.41 acres of non-native grassland, and sensitive wildlife species observed on or adjacent to the site and with a moderate potential to occur. The 25 California adolphia on site are located within the boundary of the conservation easement and would be avoided. Mitigation would occur at a ratio of 1:1 for permanent impacts to Diegan coastal sage scrub and 0.5:1 for impacts to non-native grassland through offsite purchase of mitigation credits from a County-approved mitigation bank. Impacts to sensitive wildlife species would occur through

breeding season avoidance, preconstruction surveys and avoidance measures, and habitat-based mitigation.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Non-native Riparian	I	0.00	0.00	--	--
Diegan Coastal Sage Scrub	II	0.94	0.94	1:1	0.94
Non-native Grassland	III	8.34	6.41	0.5:1	3.21
Non-native Vegetation	IV	0.29	0.29	--	--
Disturbed	IV	0.55	0.53	--	--
Arundo-dominated Riparian	--	0.06	0.06	--	--
Urban/Developed	--	0.56	0.56	--	--
Total:	--	10.74	8.79	--	4.15

The findings contained within this document are based on County records and the Biological Resource Letter Report (RECON Environmental Inc; May 28, 2024). 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 project site is not shown as PAMA on the wildlife agencies' PAMA map. Therefore, the project site 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 Diegan coastal sage scrub onsite supports a breeding pair of coastal California gnatcatchers. However, the project site is not adjacent or contiguous to preserved habitat that is within the PAMA. The land to the south and west is currently developed, and the land to the north and east is designated as Take Authorized. Therefore, the project site 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 habitat on the project site does not qualify as a linkage/corridor based on either of the above criteria. Although coastal California gnatcatcher was found onsite, the property is not part of the primary corridor connecting the northern and southern regional populations of the species. Therefore, the project site 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.

Portions of the project site are mapped on the Habitat Evaluation Model as very high or high. However, these areas contain disturbed habitat and non-native grassland that were within areas that historically contained an equestrian ranch and orchard. The coastal sage scrub on site is identified as agriculture and moderate. Notwithstanding the Habitat Evaluation Map characterization of the

habitats onsite, the property does not link significant blocks of habitat offsite. Therefore, the project site 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 habitat on the project site is not part of a block of habitat greater than 500 acres of diverse and undisturbed habitat. Therefore, the project site 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**

While coastal California gnatcatcher and California adolphia were found on site, the habitat does not support a large number of such species. The project site is mapped with Auld clay soils; however, the habitat and soils have been heavily disturbed over the years, with a long history of agriculture and ranch use on the property. In addition, the site is dominated by non-native species. Therefore, the project site does not meet this criterion.

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

The project will mitigate for impacts through an offsite mitigation bank located within a BRCA in the MSCP.

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.

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

The project includes protection of the northern portion of the site from further development 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, the existing rock outcrops and sensitive plants, from future development.

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

Project development is proposed within an 8.69-acre portion of the site and the remaining northern portion will be protected from further development through placement of a biological 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 a PAMA or areas designated as Preserve land. 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.

Jurisdictional wetlands and waterways do not occur on the project site. Therefore, this criterion does not apply.

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 includes protection of the northern portion of the site from further development through placement of a biological open space easement. While this area is not intended to serve as project mitigation for biological impacts, it will protect the existing rock outcrops and sensitive plants from future development. As the site is surrounded by development and Take Authorized Areas, impacts to sensitive habitats will be mitigated at an offsite location within a BRCA in the MSCP, which will provide for the conservation of 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.

Portions of the project site are mapped on the Habitat Evaluation Model as very high or high. However, these areas contain disturbed habitat and non-native grassland that were within areas that historically contained an equestrian ranch and orchard. The coastal sage scrub on site is identified as agriculture and moderate. Due to the surrounding development and Take Authorized Areas, the project will mitigate for

project impacts at an offsite location within a BRCA, in the MSCP, which will provide for the conservation of high and very high value habitat.

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 includes protection of the northern portion of the site from further development through placement of a biological open space easement. This area does not support any significant blocks of habitat; however, it is adjacent to open space lands to the east and this protected open space will provide adjacent protected and undeveloped open space areas. Project impacts will be mitigated at an offsite location within a BRCA in the MSCP, which will assist in creating significant blocks of habitat 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 includes protection of the northern portion of the site from further development 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, the existing rock outcrops and sensitive plants, California adolphia, from future development. Impacts to sensitive habitat will be mitigated at an offsite location within a BRCA, in the MSCP.

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.

Three special status plant species were detected during the biological survey – California adolphia (*Adolphia californica*) was found on site and San Diego County viguiera (*Bahiopsis laciniata*) and singlewhorl burrobush (*Ambrosia monogyra*) were found offsite in the 100-foot offsite survey buffer. Two sensitive wildlife species were detected during the biological survey – coastal California gnatcatcher (*Polioptila californica californica*) was found on site and least Bell's vireo (*Vireo bellii pusillus*) was detected in the 100-foot offsite survey buffer. Due to the existing development adjacent to the site, no key regional populations of these species are expected. Offsite mitigation as proposed for the project will contribute in the preservation of large blocks of high quality habitats in a biologically functioning unit.

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 due to adjacent development and surrounding land uses. Offsite purchase and preservation of high-quality habitat

to mitigate for impacts to coastal sage scrub and non-native grassland will occur in an approved mitigation bank or BRCA. This will contribute to the development of large interconnecting blocks of habitat 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.**

No critical or narrow endemic plant or animal species were detected on the site. However, one narrow endemic animal species, least Bell's vireo, was detected offsite to the northeast of the site. The project will implement measures, including breeding season avoidance and habitat-based mitigation, in order to avoid potential impacts to this species.

- 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.**

The project does not propose to count onsite preservation toward their mitigation. Therefore, this criterion does not apply.

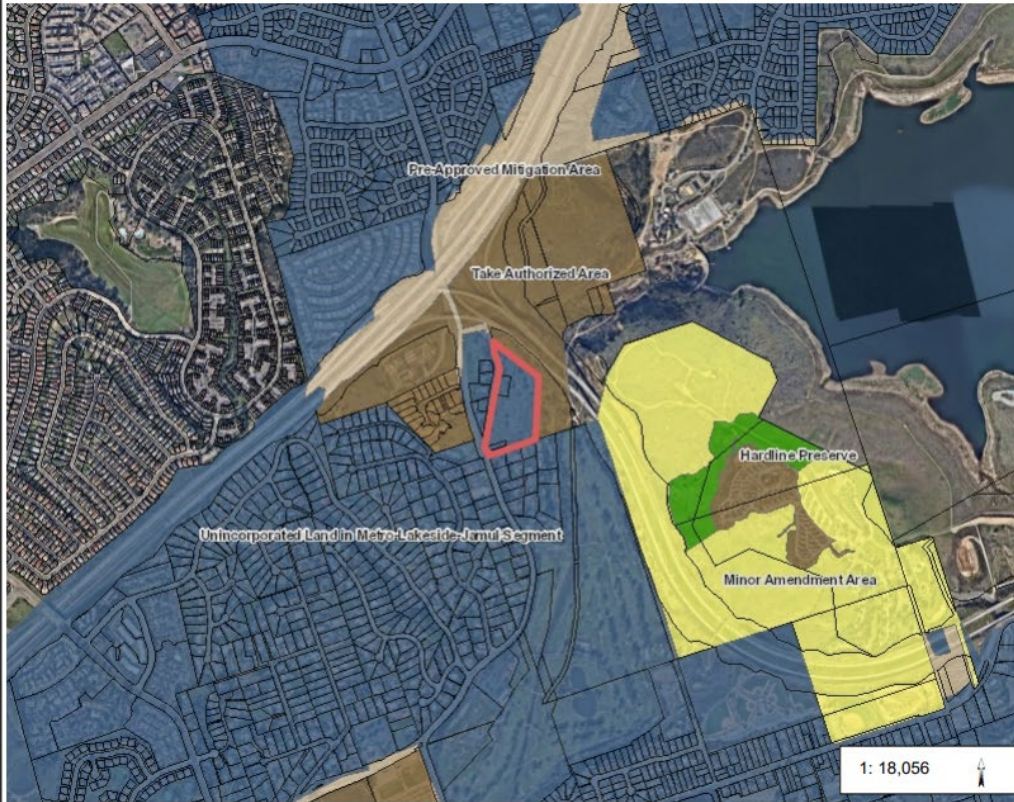
- 11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

The project 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 offsite preservation of Tier II and Tier III habitats within a BRCA in the MSCP, breeding season avoidance, and preconstruction surveys and avoidance measures. 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

May 29, 2024

MSCP Designation



Legend

- Parcels
- Multiple Species Conservation County)
 - State and Federal Pre-Approved Mitigation
 - 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: 18,056



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 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