

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For PDS2016-GPA-16-005, PDS2016-REZ-16-003
PDS2016-MUP-16-003, PDS2016-ER-16-19-001
Skyline Retirement Center
APN (s) 506-140-06-00 and -07

July 25, 2018

I. Introduction

The project proposes a senior living facility on an approximately 8.8-acre property in the Valle de Oro Community Plan Area. A multi-story main building with three separate wings will connect to central common areas. A total of 147 assisted living units will be housed in Wings 1 and 2. Wing 3 will house 75 independent living residences with basement parking. The common area will be on two levels in the main building and will include a lobby, offices, clinic services, exercise rooms, a commercial kitchen, and dining halls. Additional facilities and amenities will include a pool, landscaped courtyard and social grounds, a playground, and walking trails. Ten duplex units will also be provided in five detached structures. Three of these buildings will be near the northwestern corner of the property and two will be closer to the project entrance. The proposed project totals 232 units.

Three stormwater basins and 139 parking spaces will be provided onsite. A sidewalk will be constructed along SR 94, and a pedestrian trail will connect the western end of the retirement center to Via Mercado. All fuel management will be onsite. Two duplex units will utilize approved building materials and/or windows to withstand direct exposure to heat/fire in order to reduce fuel management impacts to nearby biological resources. Access will be provided from the existing church driveway on Campo Road with secondary access from another existing driveway just east of the church, through the church parking lot.

Land uses in the immediate Project vicinity include multi- and single-family residential development to the north and northeast, commercial uses to the west, the existing Skyline Church and parking areas to the east, and a San Diego Gas & Electric (SDG&E) substation and open space across SR 94 to the south.

The Site includes gently sloping terrain, with a high point of approximately 550 feet above mean sea level (AMSL) near the northern and northwest boundaries, sloping down toward the south/southeast to a low of approximately 480 feet AMSL along the southern and southeastern sides. A sewer and electrical easement runs east-west through the Site.

The Site is located in San Diego County, within the Metro-Jamul-Lakeside segment of the County's Multiple Species Conservation Program (MSCP), and is designated as outside the Pre-Approved Mitigation Area (PAMA). Biological Open Space Easements within PAMA exist within 200 feet east of the Project Site, adjacent to the Skyline Church parking lot. In addition, San Diego National Wildlife Refuge is 1.2 miles southeast of the Project Site adjacent to the Sweetwater Reservoir. The Site is likely too isolated and urbanized to support large mammals. In addition, since the Project area is an infill in a developed neighborhood it does not likely serve as a wildlife corridor as SR-94 would restrict movement of most wildlife except birds and urban-adapted mammals such as skunks and raccoons.

Implementation of the project will result in significant impacts to approximately 5.8 acres (net total) of sensitive Diegan coastal sage scrub (Table 1), 0.6 acre of non-native grassland, Palmer's goldenbush, San Diego sunflower, unique coast cholla patches, California gnatcatcher, orange-

throated whiptail, and raptor foraging habitat. These impacts will be significant and require mitigation. As described in the Biological Resources Letter Report dated July 10, 2018 and completed by REC Consultants, significant project impacts will be mitigated through the following measures: Mitigation for habitat impacts will be provided by conserving 6.6 acres of coastal sage scrub and 2.7 acres of southern riparian woodland in offsite Biological Open Space (up-tiered) managed by a Resource Management Plan (RMP). Mitigation for impacts to the sensitive species will be provided through habitat-based mitigation, preservation of Palmer's goldenbush in the Biological Open Space, and salvage of the coast cholla. These mitigation measures, in conjunction with standard avoidance measures, such as avoiding grading during avian breeding season, temporary fencing, and biological monitoring, will reduce the project's impacts to below a level of significance.

Table 1. Direct Habitat Impacts

Acres:	Total Existing Onsite	Gross Onsite Impacts	Impact-Neutral Portion of Onsite Gross¹	Net Onsite Impacts	Gross Offsite Impacts	Impact-Neutral Portion of Offsite Gross¹	Net Offsite Impacts	Total Net Impacts
Habitats:								
Diegan coastal sage scrub (Tier II)	7.1	6.1	0.5	5.6	0.2	0.0	0.2	5.6+0.2 = 5.8
Non-native grassland (Tier III)	0.3	0.3	0.0	0.3	0.3	0.0	0.3	0.3+0.3 = 0.6
Disturbed land (Tier IV)	1.4	1.3	0.5	0.8	0.2	0.1	0.1	0.8+0.1 = 0.9
Developed land	0.0	0.0	0.0	0.0	0.3	0.0	0.3	0.0+0.3 = 0.3
TOTAL	8.8	7.7	1.0	6.7	1.0	0.1	0.9	6.7+0.9 = 7.6

¹Project development on existing easements and existing FMZs is Impact Neutral; impact-neutral "Not A Part" areas are not included in this column because they are outside the MUP boundary.

Table 2. Mitigation for Habitat Impacts

Acres:	Total Net Impacts (ac)	Mitigation Ratio¹	Mitigation Required (ac)	Habitat Available in Mitigation Parcels² (ac)	Mitigation Parcel Acreage to be Used for Project Mitigation
Habitats:					
Diegan coastal sage scrub (Tier II)	5.8	1.5:1	8.7	6.6 ³	6.6 + 2.1 SRW up-tier = 8.7
Non-native grassland (Tier III)	0.6	1:1	0.6	0.0	0.6 SRW up-tier

Acres:	Total Net Impacts (ac)	Mitigation Ratio¹	Mitigation Required (ac)	Habitat Available in Mitigation Parcels² (ac)	Mitigation Parcel Acreage to be Used for Project Mitigation
Habitats:					
Southern Riparian Woodland (Tier I)				7.0	
TOTAL	6.4		9.3		9.3

¹See ratio determinations above

²See Table 3 below

³Consisting of 2.2 acres Diegan coastal sage scrub: coastal form (County Code 32510) and 4.4 acres of Diegan coastal sage scrub: baccharis-dominated (County Code 32530); see Table 3 below.

The Fire Protection Plan allows for a reduced fire buffer from the MUP boundary, including property boundaries, areas “Not A Part”, and a drainage buffer in the eastern portion of the site. The project requires Wildlife Agency concurrence to place a Minor Amendment area into biological open space as part of mitigation for proposed project impacts. Avoidance of a drainage that qualifies as a jurisdictional waters of the U.S./CDFW, including a 25- to 48-foot buffer, means that no wetland permits from the resource agencies will be required. A 50-foot buffer has been provided for the small RPO wetland area located along the property boundary.

The findings contained within this document are based on County records, staff field site visit and the Biological Resources Letter Report for the Skyline Retirement Center dated July 10, 2018 and completed by REC Consultants. 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.

Conformance with 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 (the “Wildlife Agencies”) will be established after the wildlife agencies have officially concurred with the projects proposal to place a Minor Amendment area into Biological Open Space as off-site mitigation for project impacts. 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 Project Site meets the criteria of a BRCA because the site 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 functionally continuous to preserved habitat that is within PAMA.

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 a preapproved mitigation area (PAMA); 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 Site is within an area that contains coastal sage scrub habitat, which supports the long-term survival of California gnatcatcher and other sensitive species, and is functionally contiguous to preserved coastal sage scrub in the PAMA on the Skyline Church property for birds such as the gnatcatcher. **The Project Site meets 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 Site is not a regional linkage/corridor because it is an infill location in a developed neighborhood and is adjacent to a busy road with a central barrier; 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.

Natural habitat on the Project Site is somewhat isolated because it is surrounded by development, and experiences substantial adverse edge effects due to its location and small size; 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 site is not, and is not within, such a block of habitat; 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**

Four sensitive species were found onsite, which is not considered a high number of sensitive species. These soils types are not known to occur onsite; does not meet this criterion.

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

The mitigation sites meet the second criterion of being located within an area of habitat which 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 preapproved mitigation area on the wildlife agencies' preapproved mitigation map. Specifically, the mitigation parcels contain coastal sage scrub habitat, which supports habitat that contributes to the long-term survival of California gnatcatcher and other sensitive species. The mitigation parcels also contain southern riparian woodland, which supports the long-term survival of least Bell's vireo (*Vireo bellii pusillus*) and other sensitive species. Although the mitigation parcels are separated from preserved habitat within the Skyline Church PAMA by SR 94 and the church itself, they are functionally contiguous for birds such as the gnatcatcher. In addition, the mitigation parcels abut San Diego Gas and Electric (SDG&E) easement lands and a strip of State and County land to the south, which is contiguous to a large block of hardline preserve. **Therefore, the mitigation parcels meet the criterion.**

As a Biological Resource Core Area, 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.

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

The project has been designed to avoid impacts to jurisdictional waters of the U.S./State, RPO wetlands, and their buffers, which are located in the eastern portion of the site. With

the exception of the jurisdictional waters and an area of coastal sage scrub in the western portion of the project, the project will impact most of the two parcels proposed for development, which are largely surrounded by existing development, including SR-94/Campo Road to the south, Via Mercado to the west, a residential subdivision to the north, and the existing Skyline Church to the southeast. In consideration of the surrounding existing development, additional avoidance of habitat would provide limited biological value and function due the level of fragmentation and associated edge effects. Therefore, the project fulfills County guidelines 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.

The Skyline Retirement Center facility proposes to construct 232 living units within the proposed project site of approximately 9 acres. The project footprint has been designed to cluster development away from jurisdictional waters of the U.S./State, RPO wetlands, and their buffers, which are located in the eastern portion of the site. With the exception of the jurisdictional waters and an area of coastal sage scrub in the western portion of the project, the project will impact most of the two parcels proposed for development, which are largely surrounded by existing development, including SR-94/Campo Road to the south, Via Mercado to the west, a residential subdivision to the north, and the existing Skyline Church to the southeast. In consideration of the surrounding existing development, additional clustering of habitat to avoid impacts would provide limited biological value and function due the level of fragmentation and associated edge effects. Therefore, the project fulfills County guidelines 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 that qualify as such under the RPO. Therefore this criterion does not apply.

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

The internal driveways meet a standard width of 28 feet as described in the Fire Protection Plan. The project does not propose changes to off-site roads. In consideration of the surrounding existing development, a reduction of road width to avoid habitat impacts would provide limited biological value and function due the level of fragmentation and associated edge effects. Therefore, the project fulfills County guidelines to consider a reduction in road width.

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 a PAMA and is not in an area designated as Preserved. Therefore, Attachment G does not apply to the project. In addition, Attachment H is not applicable since the site is not part of a linkage or 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 existing drainage on site is located outside the MUP boundary in an area protected as “Not a Part.” In the case of a Minor or Major Use Permit, areas designated as “Not a Part” “are protected just as areas within an open space easement” (County of San Diego 2010b). The drainage will also be protected by a buffer of 25 to 48 feet onsite with a buffer of 50 feet protecting the RPO wetland area. No fuel modification will encroach upon the buffer because the Project design was modified to prevent such an impact. Through protection as “Not a Part” and establishment of a buffer with no fuel management, the drainage will be protected from project impacts. Therefore the project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies. The project conforms to this criterion.

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 will avoid impacts to jurisdictional waters of the U.S./State and RPO wetlands. The project will impact coastal sage scrub and non-native grassland habitat communities. To mitigate for impacts to sensitive habitat communities, the proposed off-site biological open space easement will conserve 9.3 acres of habitat, including 2 sensitive vegetation communities/habitat types: Diegan coastal sage scrub (6.6 acres, Tier II) and southern riparian woodland (2.7 acres, Tier I). Of this total, impacts to 2.1 acres of Diegan coastal sage scrub and 0.6 acres of non-native grassland will be up-tiered to southern riparian woodland, which provides greater habitat structural diversity than the areas impacted. Impacts to coast cholla, a unique habitat feature, will be salvaged by translocation to the U.S. Fish and Wildlife Service’s San Diego National Wildlife Refuge to provide coastal cactus wren habitat. Thus, measures have been taken to maximize the habitat structural diversity of conserved habitat areas, with mitigation for impacts to unique habitats and habitat features. The project conforms to this criterion.

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 parcels containing the proposed development footprint has been identified as having low habitat value on the Habitat Evaluation Model, with the exception of the southeastern-most portion of the site, which has been identified as having very high habitat value. Most of this very high value habitat contains jurisdictional waters of the U.S./State and RPO wetlands and therefore has been designed to avoid impacts. Both parcels proposed for mitigation are

identified as having very high habitat value. Therefore the project focuses development within the low value habitat, while conserving Diegan coastal sage scrub and southern riparian woodland habitats identified as having very high habitat value. The project conforms to this criterion.

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 will impact parcels that are predominantly surrounded by existing development, including SR-94/Campo Road to the south, Via Mercado to the west, a residential subdivision to the north, and the existing Skyline Church to the east. To mitigate for impacts to sensitive biological resources, two parcels will be preserved through a biological open space easement that are adjacent to San Diego Gas and Electric (SDG&E) easement lands and a strip of State and County land to the south, which is contiguous to a large block of hardline preserve. Therefore, the project fulfills County guidelines to conserve habitat adjacent to significant blocks of habitat to reduce edge effects and maximize the perimeter of conserved lands. The project conforms to this criterion.

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

The project has been designed to avoid impacts to jurisdictional waters of the U.S./State and RPO wetlands. The parcel containing the proposed development footprint contains coastal sage scrub (Tier II) and non-native grassland (Tier III) habitat. Mitigation for these impacts will be through preservation of coastal sage scrub (in-kind) with the remainder up-tiered to southern riparian woodland (Tier I). Additionally, the parcels proposed for development have been identified as having low habitat value on the Habitat Evaluation Model, with the exception of the southeastern-most portion of the site, which has been identified as having very high habitat value. Most of this southeastern area identified as having very high habitat value contains jurisdictional waters of the U.S./State and RPO wetlands and therefore has been designed to avoid impacts. Both parcels proposed for mitigation are identified as having very high habitat value. The project focuses development within the least sensitive habitat areas. Therefore the project conforms to this criterion.

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 impact coastal sage scrub and non-native grassland habitat communities. Biological studies showed that these habitats support three sensitive wildlife species covered under the South County Multiple Species Conservation Program (MSCP), including California gnatcatcher (*Polioptila californica californica*), orange-throated whiptail (*Aspidoscelis hyperythra*), and suitable habitat (coast cholla) of coastal cactus wren (*Campylorhynchus brunneicapillus couesi*). To mitigate for impacts to sensitive habitat communities and covered wildlife species, the project will conserve 9.3 acres of habitat, including two sensitive vegetation communities/habitat types: Diegan coastal sage scrub (6.6 acres, Tier II) and southern riparian woodland (2.7 acres, Tier I) off-site in a biological open space easement. The off-site mitigation parcels are occupied by California gnatcatcher, orange-throated whiptail, as well as least Bell's vireo (*Vireo bellii pusillus*), a federally endangered species covered under the MSCP. Impacts to coast cholla will be salvaged by translocation to the U.S. Fish and Wildlife Service's San Diego National Wildlife Refuge to provide cactus wren

habitat. The project will mitigate impacts to approximately 40 individuals of Palmer's goldenbush, a MSCP covered plant species through preservation of approximately 1,744 individuals located within the two off-site mitigation parcels. Thus, measures have been taken to conserve regional populations of covered species and representations of sensitive habitats and their geographic sub-associations. The project conforms to this criterion.

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 evidence of use by large mammals including mule deer (*Odocoileus hemionus*) and mountain lion (*Puma concolor*), such as scat or deer laydown areas, was found during REC's surveys, nor were any large mammals reported in the 1995 biological resources report for the Project Site. The Site is likely too isolated and urbanized to support large mammals. In addition, since the Project area is an infill in a developed neighborhood it does not likely serve as a wildlife corridor. Wildlife would need to traverse large expanses of developed areas (such as the shopping center, residential subdivision, and church) or cross the busy six-lane SR 94 (including a concrete central barrier), which would restrict movement of most wildlife except birds and urban-adapted mammals such as skunks and raccoons. The project site is not located in an area identified as occurring within a golden eagle territory. The site does not contain nesting habitat for golden eagles and foraging habitat for this species would be considered low due its proximity to the existing development surrounding the project site, including SR-94/Campo Road to the south, Via Mercado to the west, a residential subdivision to the north, and the existing Skyline Church to the southeast. To mitigate for impacts to sensitive biological resources, 9.3 acres of mitigation on two parcels will be preserved in a biological open space easement. These mitigation parcels are adjacent to will be preserved through a biological open space easement. Therefore, the project fulfills County guidelines to conserve habitat adjacent to significant blocks of habitat to reduce edge effects and maximize the perimeter of conserved lands. The project conforms to this criterion.

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 critical populations of plant species identified within the MSCP Subarea Plan. The project will impact one narrow endemic plant species. Impacts to 40 individuals of Palmer's goldenbush, a County List B and Narrow Endemic species, are considered significant. Section 86.507(a)(1)(b) of the BMO states that "Impacts to Narrow Endemic Plant Species... shall be avoided to the maximum extent practicable." Based on the distribution of Palmer's goldenbush as individuals and small patches throughout the Site, avoidance would render development of the Site financially infeasible. The BMO states that "Where complete avoidance is infeasible, encroachment may be authorized depending on the sensitivity of the individual species and the size of the population except that encroachment shall not exceed 20% of the population on-site." In the case of this Project, the individuals proposed to be impacted are part of a larger local population located along, and primarily south of, SR 94. The off-site mitigation parcels contain approximately 1,744 individuals of Palmer's goldenbush, which will be preserved as part of project implementation. Although the Project will remove all the individuals of this plant onsite, the impact to the local

population will be much less than 20% and mitigation of 1,744 individuals will provide approximately a 44:1 mitigation ratio for those individuals impacted. Project impacts will not cause a significant decline of this population in the vicinity and the project will impact less than 20% of the total individuals that are part of the project. The project conforms to this criterion.

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 located within Pre-Approved Mitigation Area (PAMA), nor is it within a designated Preserve area. Additionally, the site is not located so as to provide connectivity between areas targeted for conservation within the preserve system. As such, the site is not located within an area identified as a core habitat or linkage area. Since the Project area is an infill within a developed neighborhood, it does not likely serve as a wildlife corridor. To access the property, wildlife would need to traverse large expanses of developed areas (such as the shopping center, residential subdivision, and church) or cross the busy six-lane SR 94 (including a concrete central barrier). Therefore the project will not jeopardize the possible or probable assembly of a preserve system within the Subarea Plan. The project conforms to this criterion.

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

The project will focus project impacts within the parcels that are surrounded by existing development, including SR-94/Campo Road to the south, Via Mercado to the west, a residential subdivision to the north, and the existing Skyline Church to the southeast. To mitigate for impacts to sensitive biological resources, 9.3 acres of habitat located on two parcels preserved through a biological open space easement. These mitigation lands are adjacent to San Diego Gas and Electric (SDG&E) easement lands and a strip of State and County land to the south, which is contiguous to a large block of hardline preserve. As such, the project focuses development impacts within existing development and preserves mitigation lands that are in proximity to lands that maintain better connectivity to sensitive habitats and minimize edge effects to mitigation lands. The project conforms to this criterion.

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

The Project Site is considered a Biological Core Resource Area (BRCA) because it is located within an area that contains coastal sage scrub habitat, which supports the long-term survival of California gnatcatcher and other sensitive species, and is functionally contiguous to preserved coastal sage scrub in the PAMA on the Skyline Church property for birds such as the gnatcatcher.

The project site is not located within a designated Pre-Approved Mitigation Area (PAMA), nor is it within a designated Preserve area. Additionally, the site is not located so as to provide connectivity between areas targeted for conservation within the Preserve system. As such, the site has not been identified as occurring within a core habitat or linkage area. The Site is likely too isolated and urbanized to support large mammals or golden eagles. Since the Project area is an infill in a developed neighborhood, it does not likely serve as a wildlife corridor. Wildlife would need to traverse large expanses of developed areas (such as the

shopping center, housing areas and church) or cross the busy six-lane SR 94 (including a concrete central barrier).

The project avoids impacts to jurisdictional waters of the U.S./State, RPO wetlands and an associated buffer of 25 to 50 feet. The project will impact coastal sage scrub (total net 5.8 acres) and non-native grassland (total net 0.6 acres) habitat communities. To mitigate for impacts to sensitive habitat communities and plant and wildlife species, the proposed off-site biological open space easement managed under a Resource Management Plan will conserve 9.3 acres of habitat, including 2 sensitive vegetation communities/habitat types: Diegan coastal sage scrub (6.6 acres, Tier II) and southern riparian woodland (7.0 acres, Tier I). Impacts to coast cholla, a unique habitat feature, will be salvaged by translocation of individuals to the U.S. Fish and Wildlife Service's San Diego National Wildlife Refuge in order to provide coastal cactus wren habitat. Impacts to 40 individuals of Palmer's goldenbush, a narrow endemic species, will be mitigated through preservation of approximately 1,744 individuals located on the two off-site mitigation parcels. Habitat based mitigation within the off-site mitigation parcels and breeding season avoidance measures will be provided to mitigate for impacts to sensitive wildlife species and raptor foraging habitat.

Kimberly Smith, Planning & Development Services

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MSCP Designation For
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