

September 2, 2025

Jonathan Snyder, Acting Field Supervisor U.S. Fish and Wildlife Service Carlsbad Field Office 2177 Salk Avenue Carlsbad, CA 92008

Melanie Burlaza, Senior Environmental Scientist (Supervisory) Regional Conservation Planning-NCCP, RCIS California Department of Fish and Wildlife 3883 Ruffin Road San Diego, CA 92123

SUBJECT: 2024 MULTIPLE SPECIES CONSERVATION PROGRAM ANNUAL REPORT

Dear Mr. Snyder and Ms. Burlaza:

MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP) 2024 ANNUAL REPORT SUMMARY

Enclosed is the City of San Diego's 2024 MSCP Annual Report (Annual Report). The Annual Report details progress towards the original conservation goal of 52,727 acres to be preserved within the Multi-Habitat Planning Area (MHPA) prior to expiration of the City's MSCP permit in 2047. We are proud to report that we have achieved over 99% of our conservation goal. Table 1 below details our remaining conservation requirements. In developing this report, the City of San Diego (City) utilized HabiTrak—the GIS extension developed by the California Department of Fish and Wildlife (CDFW) for tracking loss and gain of habitat from private and public development.

In HabiTrak, impacts due to entitled development are entered as *habitat losses* while mitigation measures such as dedication in fee title, covenant of easement areas and property acquisitions for conservation purposes are entered as *habitat gains*. In 2024, the City recorded a total habitat gain of approximately 80 acres (61 acres inside the MHPA and 19 acres outside the MHPA). The total habitat loss for 2024 was 1.91 acres (0 acres were lost inside the MHPA and 1.91 acres outside the MHPA). Please see Attachments 1a through 1d for summary tables which detail habitat conservation by habitat type, conservation gain and habitat loss generated by HabiTrak for the 2024 reporting year (January 1, 2024 – December 31, 2024). During the 2024 HabiTrak reporting process, the City and CDFW worked to update the Habitat Planning Area (HPA) boundary layer that HabiTrak uses for the conservation accounting model. The HabiTrak HPA boundary layer had not previously reflected BLAs that received concurrence by USFWS and CDFW or approved BLCs. These updates are reflected below in the acreage amounts conserved for 2024 within the MHPA and outside the MHPA and in the substantial decrease in remaining acreage required to meet the City's MHPA conservation goal. The City and CDFW are developing a process to ensure that all future MHPA BLAs and BLCs are updated in CDFW's HabiTrak HPA boundary layer prior to submittal of annual data for HabiTrak.

TABLE 1 – 2024 CITY OF SAN DIEGO CONSERVATION ACCOUNTING						
MHPA	Conserved	Conserved Lands obligated for		Remaining MHPA		
conservation	acreage within	acreage outside	future MHPA	conservation		
requirement	the MHPA	the MHPA	conservation	requirement		
(2023) 52,727 acres	36,608 acres	3,244 acres	14,932 acres	1,187 acres		
(2024) 52,727 acres	37,519 acres	2,442 acres	14,932 acres	276 acres		

Additionally, the City completed the required MSCP monitoring and land management activities on over 53,000 acres of conserved open space including: mitigation, habitat enhancement and restoration, invasive species removal, access control, trash and debris removal, enforcement, abatement of unhoused encampments, volunteer events and education. Environmental education is a vital part of our natural resource stewardship efforts and thus is included as a management activity because connection to nature promotes increased conservation and stewardship by engaged citizens.

HABITAT ACQUISITION FUND CONTRIBUTIONS/CONSERVATION ACQUISITIONS

Payment into the Habitat Acquisition Fund (HAF) is a mitigation method for small projects meeting specific requirements—such as projects less than five acres in size or small isolated locations that permit in lieu fees to be paid and pooled by the City to acquire habitat within the MHPA. In 2024, there were no deposits made into the HAF. The HAF year-end balance was \$1,296,773 of which—\$1,217,760 has been allocated for future acquisition and \$56,039 for administration. There is \$22,974 accrued in interest that is to be allocated with the next financial management budgetary adjustment for the HAF.

HABITAT ACQUISITIONS

The City, through the Economic Development Department's Real Estate Division, utilizes grants, HAF and other means to purchase land for MSCP conservation. Departments involved in acquiring properties for habitat conservation include the City Planning Department, Parks & Recreation Department, Public Utilities Department and Engineering & Capital Projects. No land was purchased using the HAF in 2024.

CORNERSTONE LANDS AND CONSERVATION SUMMARY

In accordance with the Cornerstone Lands Conservation Bank Agreement, the City has 1,000 acres of upland mitigation credit associated with the Marron Valley Cornerstone Lands Conservation Bank. Credits are sold in acres (i.e., 1 credit = 1 acre). In 2024, one project utilized habitat credit sales. The total bank balance is 892.25 acres of remaining credits of Tier II and Tier III habitat (Attachment 2a).

Revenue collected from credit sales is placed in an interest-bearing account. The current land value is \$2,470,583.72, the total endowment amount is \$386,029.31 and current burrowing owls total is \$5,515.38, for an overall account total of \$2,862,128.41 as of December 31, 2024 (Attachment 2b). Note that land management activities are funded by the PUD budget and therefore do not reduce revenue for this account.

CITY DEPARTMENT CONSERVATION SUMMARY AND PROJECT ACCOUNTING

In addition to HabiTrak, this report also includes annual data from City departments concerning small public projects covered by programmatic permits that have a cumulative effect on the MHPA. These City departments include Public Utilities Department, Engineering Capital Projects and Stormwater Department. Project accounting for the 2024 calendar year is as follows:



Public Utilities Department (PUD)

In 2024, PUD implemented a total of four emergency projects that resulted in impacts to sensitive biological resources requiring mitigation (Attachment 3a). In 2024, there were three projects reported with impacts inside the MHPA. These included the Point Loma Wastewater Treatment Plant Erosion Emergency – Hillside Above, Shawn Canyon Manhole 75 Emergency Repair and 2024 Emergency Water Main Break at Valle Del Sur Court. The three projects impacted sensitive habitat including Diegan Coastal Sage Scrub (0.2 acres) and Coastal Sage Scrub (0.2 acres). The total impact for these projects was 0.4 acres which required 0.4 acres of mitigation (Attachment 3b).

PUD is also responsible for implementation of the Canyon Sewer Cleaning Program & Long-Term Sewer Maintenance Program (Program) to access, clean and repair miles of sewer infrastructure located in canyons and other environmentally sensitive areas. The objectives of the Program are:

- To complete the inspection and cleaning of the City sewer infrastructure located in canyons and other environmentally sensitive areas.
- To identify and implement efficient, effective and environmentally sensitive means to accomplish the necessary canyon sewer cleaning activities.
- To provide for long-term maintenance of canyon sewer infrastructure, recognizing that availability of access to the infrastructure is essential for an effective long-term program, in accordance with Council Policy 400-13.
- To evaluate and pursue options to redirect sewage flows out of canyons and into street sewer lines or other accessible areas, where feasible and appropriate pursuant to Council Policy 400-14.

PUD provided an annual progress report (the 2024 Annual Program Report) to the Open Space Canyons Advisory Committee on the Program for the year from July 1, 2023, through June 30, 2024. This report provided the status of all Program activities within the reporting year including habitat mitigation, long term access planning and implementation, construction and emergency projects and 25-month revegetation and restoration projects located throughout the City. The full report and details for all activities in 2024 can be found in Attachment 3c.

Engineering & Capital Improvements Department (ECP)

In 2024, ECP reported three projects with impacts to the MHPA. These included the 2870 Mobley Street Storm Drain Replacement, Old Mission Dam Dredging, Tecolote Canyon Trunk Sewer Improvement-Tecolote Canyon Golf Course Water Connection. The three projects impacted sensitive upland habitat

Page 4 Mr. Snyder and Ms. Burlaza September 2, 2025

including Diegan Coastal Sage Scrub and Disturbed Diegan Coastal Sage Scrub (2.3 acres), Coast live oak woodland (0.22 acres), Maritime succulent scrub (0.28 acres), Non-native grassland (1.34) and Southern mixed/poison oak chaparral (0.21 acres). The three projects impacted wetland including Emergent wetland (0.02 acres), Southern riparian forest (and disturbed)/woodland (0.22 acres), Southern willow scrub/disturbed southern willow scrub (0.22 acres), Unvegetated stream (0.05 acres), Mulefat scrub (0.03 acres), and Oak riparian forest/disturbed oak riparian forest (0.55 acres). These projects impacted a total of 4.35 acres of upland habitat which required 4.83 acres of mitigation; and 1.09 acres of wetland habitat which was mitigated through a combination of onsite restoration and offsite mitigation credit. Note that impacts associated with 2870 Mobley Street Storm Drain Replacement were less than a tenth of an acre which did not require mitigation and mitigation associated with Old Mission Dam Dredging was fulfilled by a previous project and did not require new mitigation. More details of these projects can be found in Attachment 3d.

Stormwater Department (SWD)

The Municipal Waterways Maintenance Plan (MWMP) (Project No. 616992) and its associated Final Environmental Impact Report (Project No. 616992/SCH No. 2017071022) was adopted and certified by the San Diego City Council in June 2020. The MWMP allows SWD to conduct maintenance and repair activities within its stormwater facilities located throughout the City, and it requires mitigation for any related impacts to environmental resources, such as upland and wetland vegetation. In 2024, SWD maintained and completed the following MWMP projects:

Routine Maintenance

• Titus 1

Emergency Maintenance

- Industrial 1 & 2
- Flintkote 1
- Garnet 2
- PB-Olney 1
- Baja 1
- Smuggler's Gulch 1



Total SWD impacts in 2024 were approximately 12.25 acres of which 0.16 acres were within the MHPA. The Industrial 1 FY 24 Emergency Maintenance project impacted a total of 0.07 (previously mitigated) acres within the MHPA which comprised of approximately 0.01 acres of Freshwater Marsh (concrete lined) and 0.06 acres of Riparian Forest (southern willow forest). The Titus 1 FY 24 Emergency project impacted a total of 0.09 acres within the MHPA which comprised of 0.07 acres of Disturbed Land, 0.01 acres of Ornamental Plantings and 0.01 acres of Natural Flood Channel. Mitigation for Titus 1 FY 24 Emergency project was 2:1 to achieve the no-net loss of wetland area in accordance with the MWMP and San Diego Biological Guidelines (City of San Diego 2018) requirements. Please refer to Attachment 3e which details related impact acreages to the various vegetation and wetland communities listed.

To compensate and mitigate for 2024 and past losses, the department uses available SWD as well as non-SWD managed mitigation opportunities and continues to plan, design, permit, construct and conduct long-term monitoring and maintenance of several mitigation sites. A few mitigation sites have already been developed and approved (i.e., signed-off or in-construction) and credits have been allocated for the one-time mitigation that is required and assigned to MWMP facilities. In addition, SWD continues to coordinate permitting activities with the regulatory and resource agencies on remaining potential

mitigation sites to serve as Permittee Responsible Mitigation for specific prioritized MWMP facilities or Advanced Permittee Responsible Mitigation with credit acreage that may be assigned to MWMP facilities as they are prioritized. SWD used or will use the sites listed in Table 2 below to offset impacts for its 2024 maintenance activities.

TABLE 2 – 2024 SWD MITIGATION SITES					
Mitigation Site	Status				
Los Peñasquitos Canyon Enhancement Phase I	In long-term management				
Tijuana River Valley In-Channel Enhancement Area	In long-term management				
San Luis Rey Mitigation Bank	Credits purchased and allocated				
Marron Valley Cornerstone Lands Mitigation Bank	Credits purchased and allocated				
Stadium Wetland Mitigation	Credits purchased and allocated; site is				
	operated by PUD				

The Los Peñasquitos Canyon Enhancement Phase I project (Los Peñasquitos Phase I) received sign-off from the resource agencies in 2021 and is currently in long-term management. Los Peñasquitos Phase 1 provides a total of 7.30 acres of wetland enhancement mitigation credits. Los Peñasquitos provided wetland enhancement mitigation for the Industrial 1 & 2, Flintkote- 1 and PB-Olney-1 projects. The Tijuana River Valley In-Channel Enhancement Area provided wetland mitigation for the Smuggler's Gulch-1 project. SWD has also purchased approximately 1.4 acres of mitigation credits at PUD's Stadium (San Diego River) which was used as mitigation credits for Titus-1 project and other projects. Mitigation credits from Marron Valley Cornerstone Lands Mitigation Bank provided upland credits for the PB-Olney-1 and Baja-1 projects.

In FY 2024, SWD also made progress on other Permittee Responsible Mitigation and Advanced Permittee Responsible Mitigation sites that will provide the required mitigation for past as well as future facility maintenance activities. These sites are listed below in Table 3.

TABLE 3 – 2024 PRM and APRM Sites					
Mitigation Site	Status				
2015/2016 Emergency Mitigation Plan Rehabilitation Sites: South Chollas & Paradise Canyon	Bid and Contracting in Progress				
Smythe-Bandola	Bid and Contracting in Progress				
Los Peñasquitos Canyon Enhancement Phase I	Bid and Contracting in Progress				
El Cuervo del Sur Phase II	Bid and Contracting in Progress				
Hollister Quarry Wetland Mitigation	Bid and Contracting in Progress				

Additional information about the channel maintenance and mitigation site projects are documented in SWD's <u>MWMP FY24 Annual Report</u>. This report covers work that occurred in fiscal year 2024 (July 1, 2023-June 30, 2024).

Page 6 Mr. Snyder and Ms. Burlaza September 2, 2025

Information on the <u>MWMP</u> and <u>Final EIR</u> can be accessed by the public online on the City's website and California Environmental Quality Act website.

NATURAL RESOURCE MANAGEMENT PLANS

Natural Resource Management Plans (NRMPs) fulfill the MSCP Implementing Agreement requirement to prepare area-specific management directives consistent with MSCP directives for MHPA preserve lands.

NRMP Strategic Roadmap

In 2023, the City completed a geospatial analysis to provide a data and equity-driven roadmap for determining NRMP boundaries and prioritizing future NRMP preparation. NRMPs are documents that provide insight into existing and historical conditions within designated boundaries in order to provide guidance for area specific land management. Proposed NRMP boundaries were delineated based on several factors, including watershed, habitat connectivity, habitat type and MHPA designation. The preliminary prioritization is based on a geospatial analysis that included several metrics relevant to the MSCP and equity: connectivity-core size, connectivity-linkage length, species diversity of rare plants, species diversity of rare animals, socio-economic status/climate vulnerability and percent city-owned land. A full report (NRMP Strategic Roadmap) detailing the methods, results and recommendations resulting from this analysis is expected to be published in 2025. The City intends to complete the NRMPs that are currently in progress and then move forward with preparing NRMPs in the order recommended by the NRMP Strategic Roadmap. See below for a status update on the NRMPs currently in process.

- Crest and Gonzales Canyons NRMP: The NRMP Strategic Roadmap study strongly indicated that the areas known as Crest Canyon, North City West Open Space and Gonzales Canyon should be considered a single connected biological resource area as determined by multiple factors, including shared watershed, habitat connectivity and similarity of sensitive resources. Previously, Crest Canyon was being prepared as a separate NRMP, while North City West Open Space and Gonzales Canyon were included in the Pacific Highlands Ranch NRMP, which included additional MHPA areas south of Del Mar Heights Road. The result is that the relevant portions of the Pacific Highlands Ranch NRMP are now being combined with the Crest Canyon NRMP to create a new Crest and Gonzales Canyons NRMP. The Draft Crest and Gonzales Canyons NRMP is expected to be ready for agency review in late 2025.
- Tecolote Canyon Natural Park NRMP: The Tecolote Canyon Natural Park NRMP and Master Plan
 Update have been approved by the wildlife agencies and the public and are being reviewed by
 the Development Services Department for necessary permits to implement the revised trail
 system. Final alignments of trails, bridges and the location of mitigation areas are pending due to
 the Tecolote Trunk Sewer Project that began implementation in 2023. The NRMP is expected to
 be completed in late 2026.
- Pacific Highlands Ranch NRMP: As previously noted, the North City West Open Space and Gonzales Canyon areas are now included in the Crest and Gonzales Canyons NRMP. The MHPA areas south of Del Mar Heights Road are expected to be included in a forthcoming addition to the Del Mar Mesa and Carmel Mountain NRMP, along with additional MHPA land adjacent to Carmel Mountain Preserve.
- Otay Valley Regional Park NRMP: Biological surveys have been completed. Draft document revisions are scheduled for fall 2025.

• Lusardi and La Zanja Canyons NRMP: The biological surveys are complete. The document is scheduled to be drafted in the summer of 2026.

MHPA LAND MANAGEMENT AND MONITORING

Land management in support of the City's MSCP Subarea Plan is performed by PUD and PRD. A summary of management activities performed by each department are as follows:

Public Utilities Department Lands

In 2024, management activities were conducted by PUD staff and consultants within Cornerstone and PUD-owned lands including Barrett Reservoir, Eichenlaub Ranch, El Capitan Reservoir, Hodges Reservoir, Lake Murray and Chaparral Canyon, Marron Valley, Upper and Lower Otay Reservoirs, Pamo Valley, Proctor Valley, San Diego River and Lakeside, San Pasqual Valley and Sutherland Reservoir. Activities included, but were not limited to, field inspections, trash and debris removal, fence repair, invasive species detection and removal, sign installation, weed abatement, maintenance and monitoring of restoration sites, vernal pool monitoring, vernal pool maintenance and restoration and cactus wren habitat restoration (Attachment 4).

In addition, PUD manages the Canyon Sewer Cleaning Program and Long-Term Sewer Maintenance Program. The objectives of the program are to complete the inspection and cleaning of the City's sewer infrastructure located in canyons and other environmentally sensitive areas, and identify and implement efficient, effective and environmentally sensitive means to accomplish the necessary canyon sewer cleaning activities. The program also provides opportunities to evaluate and pursue sewage flow redirection by removing sewer lines from canyons and relocating them within streets or other accessible, less biologically sensitive areas. More details are available in the 2024 Program Progress Report in Attachment 3c.



Parks & Recreation Department Lands

Management of MHPA lands within the City's conserved open space areas is performed by PRD's Open Space Division and is the responsibility of an interdisciplinary team of biologists, park rangers, pesticide applicators, ground maintenance managers and workers, planners and nature center directors. In addition to protecting the native species and habitats within each preserve, these staff provide excellent educational opportunities for all park visitors. Each year, thousands of people visit the nature centers at

Tecolote Canyon Natural Park and Mission Trails Regional Park, and hundreds of children participate in environmental education through partnerships with local schools, nature programs, guided walks and interpretive signs and kiosks.

PRD management activities included trails management, habitat restoration and enhancement, trash removal and illegal camp abatement, brush management and fire protection. Although not required, the Parks and Recreation Department continues to compile details of management and monitoring activities covering the City's eleven Ranger Districts into a yearly report. The most recent report is the 2023 MSCP Management Actions Report. PRD Open Space staff are currently updating the 2024 MSCP Management

Actions Report. The final 2024 Management Actions report will be posted to the City's website upon completion, anticipated in summer 2025.

The City has worked in partnership with the San Diego Management and Monitoring Program (SDMMP), participating jurisdictions and other stakeholders to develop a regional protocol that ensures consistency in data collection and provides a standardized basis for documenting occurrence status and assessing habitat and threats for the various rare plant species. Since 2014, the City has submitted rare plant monitoring data to SDMMP for inclusion in a regional database and is available at the following link: 2024 MSCP Rare Plant Monitoring Report.



In 2022, PRD's Open Space Division created the <u>Multiple Species Conservation Program Covered Species</u> Story Map. There are eighty-five species protected by the MSCP. Details on specific flora and fauna species covered under the program can be found in this Story Map with the goal of informing the public and city staff about protected species to better monitor and manage these species and their associated habitats.

Heritage Brodiaea Preserve

The Heritage Brodiaea Preserve (HBP) is an approximately 14-acre biological open space area that was dedicated as part of the Heritage Bluffs II development project. The HBP is in the northern part of San Diego County. The HBP occurs to the south of Carmel Valley Road and to the east of the Black Mountain Open Space Preserve.

The City included the HBP area into its MSCP Subarea Plan's MHPA in 2021. The goal of the HBP is to facilitate the conservation, preservation and enhancement of biological resources as part of the mitigation for impacts associated with development of the Heritage Bluffs II and East Clusters development project sites. The HBP has preserved a regionally significant population of thread-leaved brodiaea (Brodiaea filifolia) in a conservation easement dedicated for that purpose.





The 2024 HBP Summary Monitoring Report (Year 8) presents the results of activities conducted within the Heritage Brodiaea Preserve (HBP) during the period of January 1, 2024, to December 31, 2024. Activities discussed in this report include site maintenance activities, thread-leaved brodiaea (*Brodiaea filifolia*) 2024 vegetative population counts and flowering data and native grassland mitigation implementation. The full 2024 HBP Summary Monitoring Report has been provided as Attachment 5.

VERNAL POOL HABITAT CONSERVATION PLAN

The City of San Diego <u>Vernal Pool Habitat Conservation Plan</u> (VPHCP) and <u>Vernal Pool Management and Monitoring Plan</u> (VPMM) were adopted by the San Diego City Council on January 22, 2018, and the federal take permit was received in August 2018. The VPHCP and VPMMP are available on the City's <u>Biodiverse</u>

<u>SD website.</u> The VPHCP added an additional 275 acres into the City's MHPA and provided additional conserved habitat for the following seven threatened and endangered species:

- Otay Mesa mint (Pogogyne nudiuscula, PONU)
- San Diego Mesa mint (Pogogyne abramsii, POAB)
- Spreading navarretia (Navarretia fossalis, NAFO)
- San Diego button-celery (Eryngium aristulatum var. parishii, ERAR)
- California Orcutt grass (Orcuttia californica, ORCA)
- Riverside fairy shrimp (Streptocephalus woottoni, RFS)
- San Diego fairy shrimp (Branchinecta sandiegonensis, SDFS)



Above: Spea hammondii

The City began implementation of the VPHCP and VPMMP in 2019. Implementation of the VPMMP component of the VPHCP stipulates that all conserved vernal pool complexes be monitored where legal access is available. The City conducts quantitative covered plant monitoring utilizing ArcGIS Survey 123—a form-centric data collection software used to create, share and analyze survey data using online or mobile devices. Monitoring for lands owned and managed by the City—including those managed by PRD Open Space Division, PUD and Economic Development Department's Real Estate Division—is completed in accordance with the Final City VPHCP (2018) and VPMMP (2018).

Due to the complexity of monitoring activity experienced in the first few years of VPHCP and VPMMP implementation, reporting was behind by one year. The 2024 VPHCP Summary Report was completed in May 2025 and has been published on the City's Biodiverse SD page. The most recent report is the 2024 VPHCP Summary Report (2024 Summary Report) which utilizes an Access database to translate ArcGIS Survey 123 data into a user-friendly document. The 2024 Summary Report included components such as private project VPMMP implementation, vernal pool "take" reporting, citywide changes in vernal pool

Page 10 Mr. Snyder and Ms. Burlaza September 2, 2025

management levels and funding mechanisms. Additionally, the City has developed an online portal to facilitate private property management reporting for vernal pools that launched in 2023. The 2024 Summary Report also includes total funds expended for implementation of the VPMMP as well as identification of the amount and source of funding necessary for the following year based on the results of the annual management and monitoring.

The City met with the wildlife agencies in July 2025 to discuss the results of the year 2024 monitoring and analysis and necessary adaptations to ongoing vernal pool management and monitoring. Continued coordination with the wildlife agencies is an important component to preparing VPHCP reporting and fulfilling the requirements of the VPHCP and VPMMP. The 2025 VPHCP Summary Report is underway and will include data analysis of qualitative and covered species monitoring data collected in several complexes throughout the city. Once completed, the 2025 Summary Report will be available on the Biodiverse SD webpage.

MHPA BOUNDARY LINE ADJUSTMENTS (BLA) AND BOUNDARY LINE CORRECTIONS (BLC)

The City Planning Department ensures implementation of the MSCP Subarea plan—in part through review of private and public development projects. In 2024, the City Planning Department completed over 220 development reviews for conformance with the MSCP Subarea Plan and the City's Environmentally Sensitive Lands regulations. The City tracks all individual project and community plan BLA and BLC additions and subtractions to the MHPA as part of development project review and maintains a comprehensive in-house GIS database. BLA and BLC addition areas that have been formally conserved do not show up as HabiTrak gain due to the use of the original 1997 MHPA boundary for HabiTrak functions. The City is evaluating alternatives for incorporating BLA, BLC and VPHCP additions to the MHPA into HabiTrak. The City and wildlife agencies conducted ten BLA meetings in 2024. During these meetings, proposed BLAs and BLCs were discussed as well as other project-based or informational items. Table 4 below presents the status of BLAs and BLCs discussed in 2024.

Boundary Line Adjustments

Section 1.1.1 of the City's MSCP Subarea Plan (1997) provides that, "adjustments to the MHPA boundaries may be made without the need to amend either this Subarea Plan or the MSCP Plan in cases where the new MHPA boundary results in an area of equivalent or higher biological value" and that, "the determination of the biological value of a proposed boundary change will be made by the City in accordance with the MSCP Plan, with the concurrence of the wildlife agencies." Section 5.4.2 of the Final MSCP Plan (August 1998) sets forth the six criteria that the City and wildlife agency staff use to determine if a proposed BLA meets the "functional equivalency" test. MSCP staff obtain wildlife agency concurrence on BLA findings through the development review process. There were no MHPA BLA approvals in 2024.

Boundary Line Corrections (BLCs)

The original MHPA boundary for the City was established as part of the regional MSCP mapping efforts, which became effective in March 1997. In 2012, the City and wildlife agencies agreed MHPA BLCs are allowed to rectify minor mapping inaccuracies at the project level. For a MHPA BLC to be supported by City staff, it must be clearly demonstrated that:

- 1) The proposed area to be corrected out was legally permitted prior to plan adoption in 1997;
- 2) No habitat, including wetlands, would be removed,

- 3) No buffer area (e.g., wetland buffer, wildlife corridor) would be impacted, AND,
- 4) Removing the area from the MHPA would not release the applicant from having to otherwise comply with the City's MSCP Land Use Adjacency Guidelines.

Four MHPA BLCs were processed through review and approval of project specific entitlements in 2024 as listed in Table 4 below.

TABLE 4 - MHPA BOUNDARY LINE ADJUSTMENTS & CORRECTIONS CALENDAR YEAR 2024							
Project Name	Project Number	Project Submittal Date	BLA/BLC Approval Date	Project Description			
Torey Pines Business Park Project	PRJ-1062427	June 6, 2022	August 12, 2024	The MHPA BLC removed a portion of the project (2.04 acres) that was legally permitted and developed in 1975. The project would not remove any sensitive habitat and would not impact any buffers or wildlife corridors. The project added 3.24 acres into the MHPA.			
Enclave Park	PRJ-1070661	September 9, 2022	August 1, 2024	The BLC included a minor subtraction of MHPA resulting in the removal of 0.4 acres of land that was legally permitted and developed in 1974. The project would not remove any sensitive habitat and would not impact any buffers or wildlife corridors.			
9785 Towne Centre Dr	PRJ-1117036	May 4, 2024	November 5, 2024	The MHPA BLC removed a portion of the project (1.9 acres) that was legally permitted and developed in 1991. The project would not remove any habitat and would not impact any buffers or wildlife corridors.			
University Community Plan Update	SCH No. 2021070359	September 26, 2018	July 22, 2024	The MHPA BLC added areas of City owned land containing sensitive habitat types such as Coastal Sage Scrub, Chapparal, and Non-Native Grassland (28.67 acres).			

PUBLIC OUTREACH AND EDUCATION

The City Planning Department continues to explore opportunities to provide more easily accessible information related to the MSCP and the VPHCP. The City Planning MSCP program and webpage was revamped under the heading Biodiverse SD to highlight the biodiversity of the region and emphasize how the MSCP strengthens and protects our unique ecosystems and regional biodiversity. This webpage includes the Multiple Species Conservation Program Covered Species Story Map, the VPHCP Interactive Mapping Tool and MHPA interactive map well as links to open space parks and the regulations for

biological resources. This public facing webpage provides easy access to detailed information regarding the MHPA, vegetation mapping and conservation status. The City Planning Department includes a Public Engagement Program Manager and is continuing to develop innovative ways to equitably engage with the community.

CONCLUSION

The City continues to demonstrate commitment to the MSCP through comprehensive and innovative implementation. From project review and development permitting, to land acquisition and management, City staff



works side by side with our partner agencies, non-profits and the public to keep the Multiple Species Conservation Program at the forefront of regional habitat conservation. We look forward to continuous collaboration well into the future—thus ensuring the success of habitat conservation plan's critical role in California's conservation efforts.

Please contact us at <u>BiodiverseSD@sandiego.gov</u> if you have any questions.

Sincerely,

Heidi Vonblum, Planning Director City Planning Department

lieid roll

City of San Diego

dmm/kg

Attachments: 1. City of San Diego Habitrak Summary Tables 2024

- a. Habitat Conservation Accounting Model
- b. Summary of Habitat Losses and Gains
- c. Summary of Project Gains
- d. Summary of Project Losses
- 2. Marron Valley Cornerstone Lands Conservation Bank
 - a. Summary of Marron Valley Cornerstone Lands Conservation Bank Debits

Page 13 Mr. Snyder and Ms. Burlaza September 2, 2025

- b. Cornerstone Land Mitigation Fund Balance 700021
- 3. City of San Diego Department Project Accounting
 - a. 2024 PUD Project Impacts by Habitat
 - b. 2024 PUD Mitigation Assignments
 - c. 2024 Canyon Sewer Program Progress Report
 - d. 2024 ECP MSCP Project Summary
 - e. 2024 SWD Impact Totals by Project and Habitat
- 4. 2024 PUD Resource Management Activities
- 5. Heritage Brodiaea Preserve 2024 Annual Report

cc:

David Zoutendyk, Coastal Division Manager, U.S. Fish and Wildlife Service Anita Eng, Fish and Wildlife Biologist, US Fish and Wildlife Service Melanie Burlaza, Senior Environmental Scientist, CA Department of Fish and Wildlife Ali Kalinowski, Environmental Scientist, CA Department of Fish and Wildlife Kelly Fisher, Environmental Scientist, CA Department of Fish and Wildlife Heather Schmalbach, Senior Environmental Scientist, CA Department of Fish and Wildlife Kelley Stanco, Deputy Director, City Planning Department Julia Chase, Chief Resilience Officer, City Planning Department Andy Field, Director, Parks and Recreation Department Karen Dennison, Assistant Director, Parks and Recreation Department Erika Ferreira, Deputy Director, Parks and Recreation Department Megan Hickey, Assistant Deputy Director, Public Utilities Department Keli Balo, Deputy Director, Public Utilities Department Carrie Purcell, Deputy Director, Engineering and Capital Projects Department Kristy Forburger, Program Manager, Engineering & Capital Projects Department Sumer Hasenin, Deputy Director, Stormwater Department Eddie Salinas, Deputy Director, Stormwater Department Elyse Lowe, Director, Development Services Department Mary Carlson, Assistant Deputy Director of Real Estate, Economic Development Department