



BIOLOGICAL RESOURCES REPORT CLAIREMONT COMMUNITY PLAN UPDATE

San Diego, California

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Table of Acronyms

AMSL	Above Mean Sea Level
ASMDs	Area Specific Management Directives
BCME	Biological Construction Mitigation/Monitoring Exhibit
BLC	Boundary Line Correction
BMPs	Best Management Practices
BRR	Biological Resources Report
CAP	Climate Action Plan
CCPA	Clairemont Community Plan Area
CCPU	Clairemont Community Plan Update
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFG	California Fish and Game
City	City of San Diego
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
County	County of San Diego
CRPR	California Rare Plant Ranks
CSVr	Consultant Site Visit Record
CWA	Clean Water Act
DEIR	Draft Environmental Impact Report
DSD	Development Services Department
ED	Environmental Designee
ESL	Environmentally Sensitive Lands
FEIR	Final Environmental Impact Report
FESA	Federal Endangered Species Act
HCP	Habitat Conservation Plan
I	Interstate
ITP	Incidental Take Permit
LSAA	Lake and Streambed Alteration Agreement
MBTA	Migratory Bird Treaty Act
MCAS	U.S. Marine Corps Air Station
MHPA	Multi-Habitat Planning Area

MMC	Mitigation Monitoring Coordination
MMRP	Mitigation Monitoring and Reporting Plan
MND	Mitigated Negative Declaration
MSCP	Multiple Species Conservation Program
NCCP	Natural Community Conservation Program
NRCS	Natural Resources Conservation Service
NRMP	Natural Resource Management Plan
NTP	Notice to Proceed
OR-1-2	Open Space Residential Zone
PAR	Property Analysis Record
PU	Planning Units
RBC	Rocks Biological Consulting
RWQCB	Regional Water Quality Control Board
SanGIS	San Diego Geographic Information Source
SDMC	San Diego Municipal Code
SMARA	State Surface Mining and Reclamation Act
SR	State Route
TNWs	Traditional Navigable Waterways
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VPHCP	Vernal Pool Habitat Conservation Plan
WoS	Waters of the State
WoUS	Waters of the U.S.

1 Introduction

The Clairemont Community Plan Update (CCPU) is a comprehensive update to the existing Clairemont Community Plan Draft (City of San Diego [City] 1989, amended in 2019). The CCPU establishes an updated vision and objectives for the Clairemont Community Planning Area (Clairemont) that implement and align with the City's amended General Plan (Blueprint SD) land use framework and of City of Villages land use strategy. The update also aligns with the policy direction of the city-wide Climate Action Plan (CAP) and Parks Master Plan. Other relevant planning efforts include the Balboa Avenue Revitalization Action Program, the Morena Corridor Specific Plan, and the Balboa Avenue Station Area Specific Plan, aiming to improve community connectivity in Clairemont through pedestrian and public transit-oriented infrastructure. Existing open space parks are currently being managed by City of San Diego Parks and Recreation Staff under the Tecolote Natural Resources Management Plan (update in progress) and Marian Bear Natural Resource Management Plan. The CCPU updates land use plans to help achieve the desired vision and objectives of the Clairemont community.

1.1 PROJECT LOCATION

The Clairemont Community Planning Area (CCPA) includes approximately 8,500 acres and is located in the north central portion of the City of San Diego (City) within San Diego County (County). The CCPA is bounded by State Route (SR) 52 on the north, Interstate (I-) 805 on the east, I-5 on the west, and the Linda Vista community and I-8 to the south. Surrounding communities include University and the Marine Corps Air Station (MCAS) Miramar to the north; Kearny Mesa to the east; Linda Vista to the south; and La Jolla, Pacific Beach, and Mission Beach to the west (Figure 1). The CCPU area is located on United States Geological Survey (USGS), 7.5-minute series La Jolla (2018) Quadrangle Map (Figure 2).

1.2 PROJECT DESCRIPTION

The CCPU identifies several guiding principles, plan goals, policies, and procedures for plan implementation. The plan aims to serve the Clairemont community by promising to:

- Create Homes for All – A land use pattern that focuses on opportunities for housing within mixed-use and residential areas in order to provide a variety of housing types for all ages, incomes, and social groups.
- Protect & Enrich Every Neighborhood – The protection of canyons and open space as sensitive habitat. The plan identifies opportunities for public spaces and pocket parks, trails and joint-use facilities while providing guidance for the future identification and preservation of historical resources and districts that embody architectural and cultural history.
- Advance Mobility & Infrastructure – An improved transportation network which will further encourage walkability and transit options, in addition to new bicycle facilities that are safe and convenient. The plan will also enhance mobility infrastructure to emphasize community connectivity and support an active and healthy lifestyle for motorists, cyclists, pedestrians, and public transit users.

- Champion Sustainability – The plan promotes opportunities for urban greening and street trees to address stormwater runoff and climate change. Adopted environmental policies also protect canyons and open spaces to conserve sensitive habitats and biodiversity.
- Foster Regional Prosperity – Efficient use of commercial and industrial land is planned to enhance the economic base and generate job opportunities for residents in conjunction with the attraction, expansion, and retention of economically healthy, locally-owned and operated businesses. The plan also promotes the Rose Canyon/Creek Industrial Corridor as an emerging employment center connected to regional transit.

The CCPU will address all aspects of community development and provide recommendations to guide this development over the next 30 years. The CCPU provides for more opportunities for mixed-use development, retail and employment centers, residential areas, public spaces, and bus rapid and light rail stations while also focusing on other aspects, such as protecting natural resources, open space, and biodiversity.

The CCPA includes 789 acres of land designated as Multi-Habitat Planning Area (MHPA) under the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). Planning for these lands is addressed in the Open Space and Environmental Resources element of the existing Clairemont Mesa Community Plan (City 1989) and in the City's MSCP Subarea Plan. Within the MHPA, development remains limited to protect and ensure the viability of "covered" species, as well as to preserve a network of open space, habitat, and wildlife linkages in San Diego.

The City has existing regulations in the Land Development Code that require new development to minimize encroaching on open space, steep slopes, and canyons. The CCPU also proposes conservation policies that support preservation of sensitive biological resources. The Conservation chapter of the CCPU includes the following goals:

- Protection and enhancement of canyons, hillsides, riparian areas, and dedicated open space for their ecological diversity and opportunities for trails.
- Reduction of greenhouse gas emission at the community level in a manner that enhances the quality of life and supports the local economy.
- Incorporation of sustainable storm water management techniques to capture runoff and reduce impacts to the canyon network.
- Incorporation of sustainable building, landscape, and development techniques to reduce dependency on non-renewable energy sources, reduce emissions, solid waste, and water consumption.
- Protection of public views to natural resources.
- Promotion and expansion of the tree canopy along streets and on public and private property.

As part of this vision, the CCPU identifies several new public facilities and developments. The majority of these occur within highly urbanized areas, however some proposed parks and recreation facilities occur within areas that may support biological resources (please see Draft CCPU, Figure 6-1 for additional information and locations). These include:

- Marian Bear Trailhead Pocket Park
- North Way Trailhead Pocket Park
- Regina Avenue Trailhead Pocket Park
- Mount Lawrence Pocket Park and Linear Park
- Mount Alifan/Mount Almagosa Canyon Trails
- Via Bello Trail
- Acworth Avenue Pocket Park
- Genessee/Mesa College Trail
- A future trail south of Mount Acadia Boulevard (ME-1.4; Draft CCPU, 2020a)

Detailed plans have not been developed for these facilities, and project-specific biological surveys have not been completed for the facilities. As such, the proposed facilities are addressed at a programmatic level herein.

The CCPU also identifies several important policies and recommendations for the CCPA, as identified in Table 1, below.

Table 1. Clairemont Community Plan Update Policies and Recommendations Pertaining to Biological Resources

Policy	Description
3.6	Enhance pedestrian access to natural recreational areas, open space lands, and parks by improving connectivity and increasing awareness of trails and other pathways as complementary components of the community's circulation network via signage, wayfinding programs, and educational kiosks.
4.46	Incorporate native, non-invasive and drought-tolerant species for landscaping in parkways, medians, other public and private spaces.
4.47	Support opportunities to remove invasive species from public and private spaces and replace them with native, non-invasive and drought-tolerant species.
4.68	Design new development near canyons and slopes to adapt to the topography of the site, wherever possible, and complement the natural landscape, canyons, and hillsides of the community, with stepped building forms, multi-level landscapes and structures, and minimal use of retaining walls and extensive site grading.
4.71	Retain the following streets for access into Tecolote Canyon Natural Park: • South end of Mt. Culebra Avenue (dedicated street) • South end of Mt. Bagot Avenue (street reservation) • West end of Mt. Ashmun Drive (dedicated street) • West end of Mt. Ariane Drive (dedicated street) • South end of Mt. Carol Drive (dedicated street) • North end of Goldboro Street (dedicated street)

Policy	Description
4.72	Design buildings along the canyon edge to conform to the hillside topography and limit encroachment. A. Cluster development on level and less sensitive surfaces of site. B. Provide a stepped foundation down the slope, to accommodate a reasonable building size for lots with limited flat area. C. Grading should be minimized by using building types such as houses on stilts, which avoid the typical grading of slab/construction and have limited environmental impact. D. Incorporate landscape screening. E. Design roof pitches to mimic the slope. F. Align vehicle access and other improvements to conform to existing slopes and minimize grading.
4.73	Locate structures within the least visually prominent portion of a lot and/or away from the edge of designated open space, when all or a portion of a property is within privately-owned, designated open space.
4.74	For buildings that are adjacent to open space and MHPA, promote design strategies that reduce the potential for bird strikes.
6.23	Design trails within the Multi-Habitat Planning Area that comply with the Multiple Species Conservation Program guidelines.
6.24	Support coordination with other public agencies including Caltrans, SDG&E and San Diego Unified School District to explore opportunities for new parks and trails, and to secure new joint-use facilities.
6.25	Encourage opportunities for parks and/or trails within SDG&E properties and easement areas, especially within the utility easement that runs north/south between Tecolote Canyon Natural Park and Marian Bear Memorial Park.
7.10	Promote community awareness and responsible use of City-owned open space and canyons.
7.11	Utilize publicly-designated open space for passive recreation where desirable and feasible.
7.12	Support the preparation of a Marian Bear Memorial Park Master Plan to establish a long-term comprehensive park program for the management and preservation.
7.13	Consult the Marian Bear Memorial Park Natural Resource Management Plan for guidance in the protection of natural and cultural resources in the park.
7.14	Consult the Tecolote Canyon Natural Park Master Plan and Natural Resource Management Plan for the management and preservation of the resource- based park.
7.15	Support the enhancement of the Rose Creek Watershed.
7.16	Work to address impacts related to future development within the Rose Canyon industrial area, which could include restoring habitat in Rose Creek, improving water quality, enhancing wildlife connectivity, controlling invasive species, promoting environmental education and stewardship, and creating a pedestrian-friendly connection between Mission Bay Park to Marian Bear Memorial Park.

Policy	Description
7.17	Protect and preserve native species and their unique and sensitive habitats within the open space systems consistent with the Multiple Species Conservation Program.
7.18	Preserve, protect and restore canyons and hillsides as important visual features of community character.
7.19	Promote education, interpretive programs, and stewardship of the community's canyons through public and private partnerships.
7.20	Promote opportunities to preserve, enhance and/or restore native landscaping and remove invasive species.
7.21	Utilize appropriate low-fuel load natives in Brush Management Zone 2 and over utility easement in native areas.
7.22	Restore or enhance natural biological values and improve visual aesthetics where streets and storm drain systems abut or cross canyon landforms or steep hillsides. Habitat restoration efforts should aid wildlife movement by providing vegetative cover and controlling and directing access to designated trails.
7.23	Encourage development adjacent to canyons and open space to include pervious areas that include, but are not limited to: bio-swales, pervious pavers and cement, green roofs, and cisterns to better manage storm water runoff.
7.26	Encourage sensitive placement and consideration of appropriate design in locating bio-swales to not impede accessibility along residential and non-residential streets.
7.29	Address storm drain and culvert erosion in all canyons, creeks and open space areas by restoring eroded tributaries, addressing outfalls and downstream gully erosion and reducing runoff draining through outfalls starting at the source where feasible.

Lastly, the CCPU also includes a proposed boundary line correction (BLCs) in order to add City-owned lands into the (Multi-Habitat Planning Area (MHPA) – the City's planned habitat preserve within the Multiple Species Conservation Program (MSCP). The BLC would result in a net increase of 49.9 acres of City-owned land being added to the MHPA. Additional information regarding the proposed BLC is provided in Section 5 of this document. With BLC implementation, the City-owned parcels would be changed from MHPA 75 percent conserved to 100 percent conserved. Note that these parcels may also be dedicated Pueblo Land.

To inform the CCPU, this biological resources report (BRR) provides a summary of the existing biological resources within the CCPA and provides a programmatic-level assessment of potential impacts on biological resources that may occur through implementation of the CCPU. This analysis does not include site-specific surveys, but outlines the framework that future site-specific development would be required to follow to demonstrate consistency with City plans, policies, and regulations relating to biological resources.

FIGURE 1. REGIONAL LOCATION

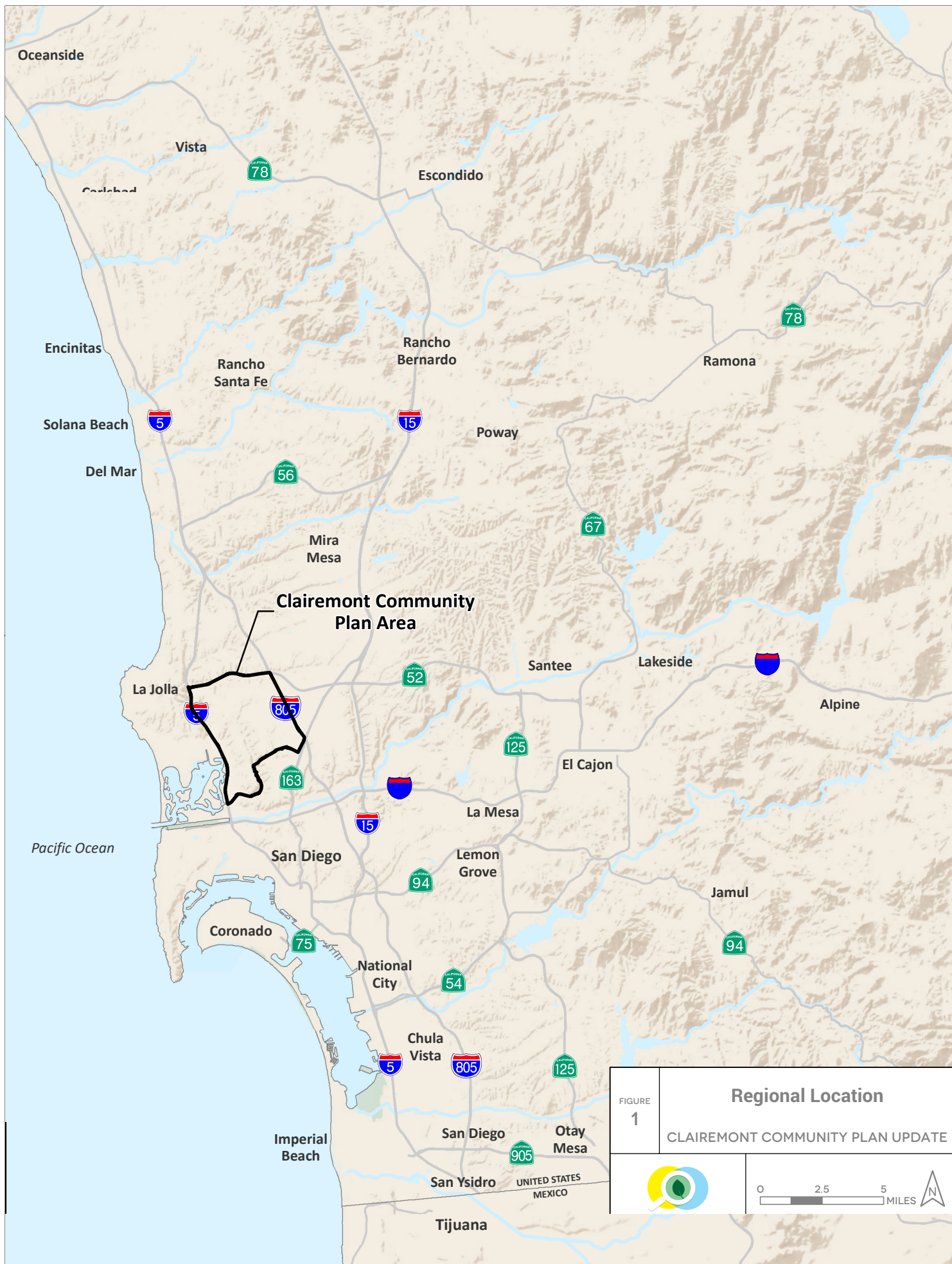


FIGURE 2. USGS TOPOGRAPHY

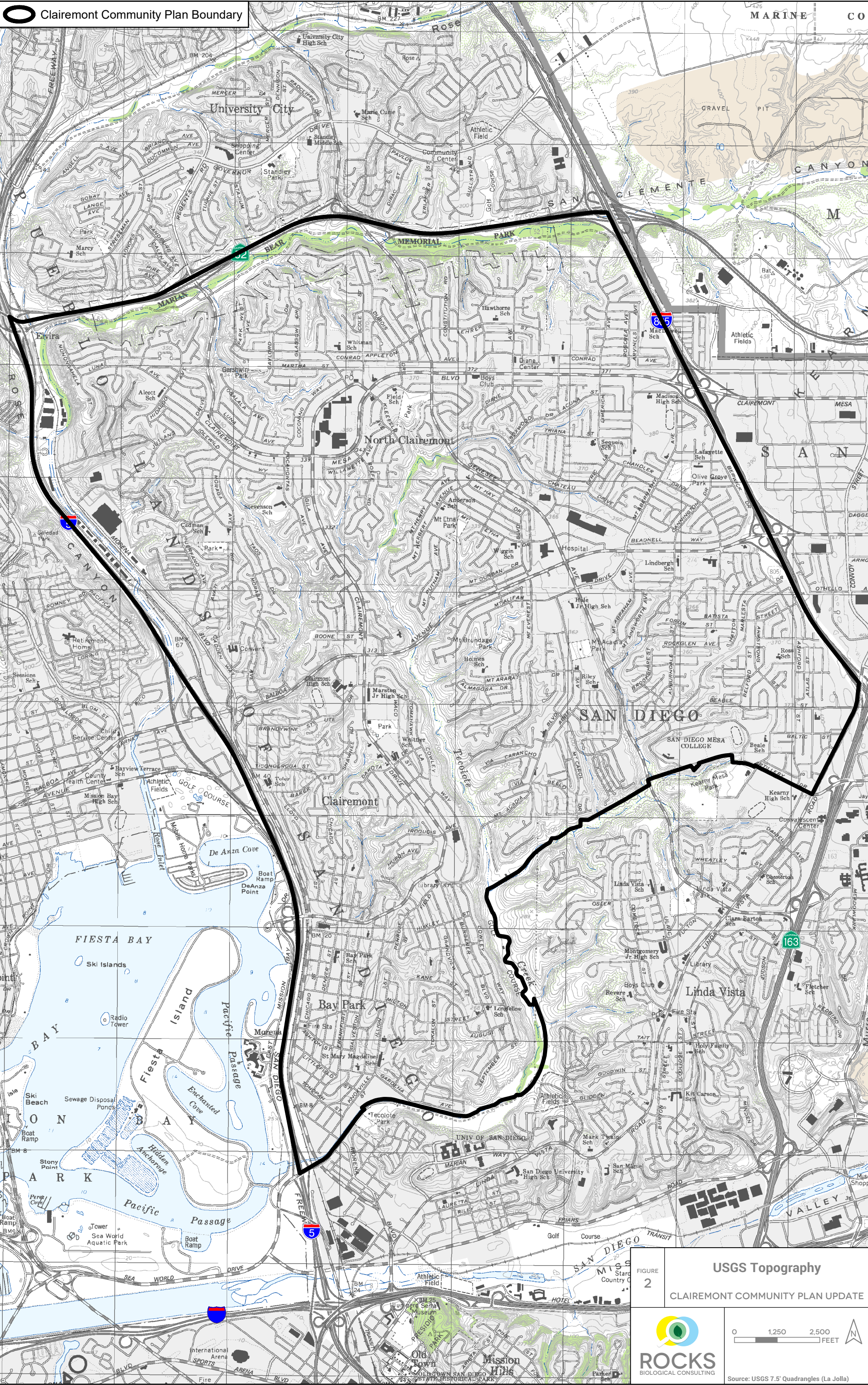


FIGURE 2

USGS Topography

CLAIREMONT COMMUNITY PLAN UPDATE



ROCKS
BIOLOGICAL CONSULTING

0 1,250 2,500 FEET

Source: USGS 7.5' Quadrangles (La Jolla)

2 Regulatory Framework

In addition to jurisdictional resource regulations, the CCPU is governed by federal, state, and local policies and regulations. This section provides a summary of regulations applicable to the CCPU area. Based on a programmatic review of Clairemont CPU policies, the proposed policies would not conflict with local, state, or biological regulations. Future site-specific development within the CCPU would undergo subsequent environmental review to ensure consistency with the City's regulatory framework for addressing biological resources impacts including the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, MSCP Subarea Plan, and Vernal Pool Habitat Conservation Plan (VPHCP).

2.1 FEDERAL

Federal regulations that apply to the CCPU are discussed in this section.

2.1.1 FEDERAL ENDANGERED SPECIES ACT

Administered by the United States Fish and Wildlife Service (USFWS), the Federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA. Section 9(a) of the FESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS designates critical habitat for endangered and threatened species. The ultimate goal is to restore healthy populations of listed species within their native habitats so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 generally describes a process of federal interagency consultation and issuance of a biological opinion and incidental take statement when federal actions may adversely affect listed species. Section 10(a) generally describes a process for preparation of a Habitat Conservation Plan (HCP) and issuance of an incidental take permit. Pursuant to Section 10(a), the City was issued a take permit for their adopted MSCP Subarea Plan and VPHCP.

2.1.2 MIGRATORY BIRD TREATY ACT

All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is now used to

place restrictions on disturbance of active bird nests during the nesting season. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

2.1.3 RIVERS AND HARBORS ACT AND CLEAN WATER ACT

The Rivers and Harbors Act of 1899 and the Clean Water Act (CWA) regulate project activities within non-marine traditional navigable waters (TNWs) and/or Waters of the U.S. (WoUS). The discharge of any pollutant from a point source into TNWs is illegal unless a permit under the CWA's provisions is acquired. Permitting for projects that include both permanent and temporary dredging and filling in Wetland and Non-Wetland WoUS is overseen by the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA. Projects can be permitted on an individual basis or be covered by one of several approved nationwide permits or regional general permits. In addition, the Regional Water Quality Control Board (RWQCB) issues Water Quality Certifications under Section 401 of the CWA for project activities that fill or dredge within Wetland and Non-Wetland WoUS and Waters of the State (WoS), including isolated waters such as vernal pools and other waters showing lack of connectivity to a TNW.

2.2 STATE OF CALIFORNIA

State regulations that apply to the CCPU are discussed in this section.

2.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) is a statute that requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of proposed activities. The purpose of the CEQA process is to identify the ways that environmental damage can be avoided or significantly reduced; prevent significant, avoidable damage by requiring project changes either through the adoption of alternatives or imposition of mitigation measures; and disclose to the public the reasons why a governmental agency approved a project if that project has significant environmental impacts that cannot be mitigated to a less than significant level.

2.2.2 CALIFORNIA ENDANGERED SPECIES ACT

The California Endangered Species Act (CESA) provides the legal framework for the conservation and protection of species and their habitats that are identified as being endangered or threatened with extinction within California. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. Once listed, a species cannot be "taken" (i.e., killed, possessed, purchased, or sold) without proper authorization. The CESA authorizes that private entities may "take" plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the California Department of Fish and Wildlife (CDFW) certifies that the incidental take is consistent with CESA (California Fish and Game (CFG) Code Section 2080.1[a]). For state-only listed species, Section 2081 of CFG Code authorizes the CDFW to issue an Incidental Take Permit for State listed threatened and endangered species if specific criteria are

met. The City was issued an incidental take permit pursuant to Section 2081 through the approval of the MSCP Subarea Plan.

2.2.3 CALIFORNIA FISH AND GAME CODE

CFGF Sections 1600 through 1603 regulate project activities within rivers, streams, lakes, and riparian habitat. CFGF Section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials that could pass into any river, stream, or lake.

CDFW can issue a Lake and Streambed Alteration Agreement (LSAA) for projects that substantially adversely affect CDFW jurisdictional resources. If the activity will not substantially adversely affect any CDFW jurisdictional resources, the entity may commence the activity without an LSAA.

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

2.2.4 PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Water Quality Control Act regulates water quality for project activities in California. Pursuant to the Porter-Cologne Water Quality Control Act, under Section 13000 et seq. of the California Water Code, the RWQCB issues Water Quality Certifications for project activities that fill or dredge within Wetland and Non-Wetland WoUS and WoS, including isolated waters – such as vernal pools – and other waters showing lack of connectivity to a TNW.

2.3 CITY OF SAN DIEGO PROGRAMS AND REGULATIONS

Development in natural areas is regulated through the City's ESL Regulations and CEQA review. Development is directed towards the least biologically sensitive areas. All subsequent future amendments to the CCPU must demonstrate consistency with the General Plan and the MSCP prior to adoption.

2.3.1 ENVIRONMENTALLY SENSITIVE LANDS

ESL are areas supporting sensitive biological resources (e.g., MHPA, rare species, wetlands, etc.), steep hillsides, coastal beaches, sensitive coastal bluffs, or special flood hazard areas (City 2018b). ESL within the CCPA includes sensitive biological resources and steep hillsides. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2018b) as outlined in the City's ESL Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 1). Impacts to biological resources within and outside the MHPA must comply with the City's ESL Regulations, which serve to implement standards and requirements of CEQA and the MSCP Subarea Plan.

The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands." The regulations require that development avoid impacts to certain sensitive biological resources as much as possible including but not limited to MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and state listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values. While a 100-foot buffer width is generally required in the coastal zone and recommended in areas outside the coastal zone, this width may be increased or decreased on a case-by-case basis in consultation with the City, CDFW, U.S. Army Corps of Engineers (USACE), and USFWS pursuant to the City's Biology Guidelines (2018b). Future development within the CCPU area would be required to comply with all applicable City ESL Regulations.

In addition, future development must comply with the City's Steep Hillside Guidelines (2004) when "development is proposed on a site containing any portions with a natural gradient of at least 25 percent (25 feet of vertical distance for every 100 feet of horizontal distance) and a vertical elevation of at least 50 feet. The steep hillside regulations are also applicable if a portion of the site contains a natural gradient of at least 200 percent (200 feet of vertical distance for every 100 feet of horizontal distance) and a vertical elevation of at least 10 feet."

Specifically, areas adjacent to Tecolote Canyon within the CCPA must comply with specific measures outlined below:

- Structures should be set back or placed at staggered distances from the canyon rim to avoid a "wall effect" along the rim. In cases where the Tecolote Canyon Natural Park boundary is at a lower elevation than the canyon rim, structures should still maintain setbacks from the rim and utilize the area between the rim and park property lines as a landscaped buffer.
- The facades of structures should be angled at varying degrees to follow the course of the canyon rim.
- When viewed from the opposite rim of Tecolote Canyon, the structures should emphasize the line of the canyon rim.

- Rooflines of structures should vary in angle and height to provide a changing profile along the Tecolote Canyon rim when viewed from the opposite rim. A changing roofline will emphasize the verticality of the canyon walls and help blend the structures into the natural hillside environment.
- In larger scale development projects, pedestrian facilities rather than auto facilities should be located adjacent to Tecolote Canyon rim as the scale of pedestrian facilities is more adaptable to the varying landforms of the canyon rim.
- Larger scale developments should provide appropriate pedestrian access to Tecolote Canyon rim. Pedestrian facilities, such as lookout points and pathways, should be located in areas adjacent to the canyon rim, but should not provide access into Tecolote Canyon Natural Park.
- Where it is appropriate to locate roadways and driveways along Tecolote Canyon rim, they should follow the natural course and contours of the rim. Landscaping should be provided to buffer roadways and driveways from the canyon. These buffered roadways and driveways would then provide open edges between the canyon and development.
- Where it is appropriate to locate parking facilities adjacent to the rim, they should be minimal in size and buffered from the canyon by landscaping.
- Traffic flow should be parallel to or directed away from the canyon rim. Adequate access for service and emergency vehicles into Tecolote Canyon Natural Park must be considered, but illegal off-road vehicles shall be excluded. Street layout and design should not create any pressure to construct new public roads through any part of Tecolote Canyon Natural Park.
- Grading should not occur within Tecolote Canyon. If any areas within the canyon are disturbed by grading occurring adjacent to the canyon, or by minor grading necessary for the provision of services such as sewers or runoff control facilities, the disturbed areas should be repaired to blend in with natural slopes and contours and should be revegetated with native plants. Additionally, grading operations should not occur during the rainy season between October 1 and April 1 of any year.

2.3.2 MULTIPLE SPECIES CONSERVATION PROGRAM

The City, USFWS, CDFW and other local jurisdictions joined together in the late 1990s to develop the MSCP, a comprehensive regional program to preserve a network of habitat and open space and ensure the viability of sensitive species, while still permitting some level of continued development. The Program was developed pursuant to the outline developed by USFWS and CDFW to meet the requirements of the State Natural Communities Conservation Planning Act of 1992.

2.3.2.1 Multiple Species Conservation Program Subarea Plan

The MSCP Subarea Plan is broken into several sections that address requirements and guidelines of the plan including Section 1.4 Land Use Considerations and Section 1.5 Framework Management Plan. Other sections of the Subarea Plan that may apply include those for boundary line adjustments (Section 1.1.1); Compatible Land Uses, General Planning Policies/Design

Guidelines, and MHPA Land Use Adjacency Guidelines (Sections 1.4.1-1.4.3) as well as general and specific management policies where applicable as well as Section 1.5.7 (Urban Habitat Lands under the Framework Management Plan). Since there is undeveloped land in the CCPU area, and that land supports sensitive plant and wildlife species both within and outside the MHPA, the City's MSCP Subarea Plan and Implementing Agreement are applicable to development of the CCPU area.

The City's portion of the MSCP Program was adopted through the City's MSCP Subarea Plan (1997a). The MSCP Subarea Plan forms the basis to carry out the mandates of the MSCP Implementing Agreement, which is the contract for the 50-year incidental take permit (ITP) between the City, USFWS, and CDFW (1997b). The Implementing Agreement ensures implementation of the Subarea Plan and thereby allows the City to issue "take" permits under the federal and State Endangered Species Acts to address impacts at the local level. Under the federal Endangered Species Act, an ITP is required when non-federal activities would result in "take" of a threatened or endangered species.

With the ITP for the MSCP Subarea Plan issued pursuant to Section 10(a), the City has incidental "take" authority over 85 rare, threatened, and endangered species including regionally sensitive species that it aims to conserve (i.e., "MSCP Covered Species"). "MSCP Covered" species are considered to be adequately protected within the City's Preserve, the MHPA, and via application of all relevant elements of the MSCP Subarea Plan, including Appendix A – Species evaluated for coverage under the MSCP which lists any required conditions for each species to be applied to ensure coverage such as modifying project design to avoid impacts, evoking various controls at the urban/wildlife interface, etc. Additional MSCP Subarea Plan discussion is located below under Section 4.3.2.3.

2.3.2.2 Multi-Habitat Planning Area

The MHPA is the area within the City from which the permanent MSCP preserve will be assembled and managed for its biological resources. The City's MHPA areas are defined by "baseline" maps, wherein development is limited based on the development area allowance of the open space residential zone (1997a) and MSCP Subarea Plan requirements.

The MHPA consists of public and private lands, where much of the required 90 percent of lands has already been conserved or ensured for conservation by legal agreement (i.e., Cornerstone Lands). According to the City's MSCP Annual Report for 2023, over 97 percent of the required acreage has been conserved/ensured (2024b). Conserved lands shown on the SanGIS database can include lands that have been set aside for baseline conservation and or lands purchased for mitigation both within and outside of the MHPA. These lands may be owned by the City (i.e., dedicated lands) or other agencies, and may or may not show up on legally recorded documents such as final parcel maps as open space, conservation, or building restricted easements. In addition, they may or may not have associated covenant of easements, irrevocable offers to dedicate or have other legal restrictions associated with them.

In general, a maximum 25 percent encroachment into the MHPA is allowed for development. If 25 percent of the site is outside the MHPA development could be restricted to this area. In addition,

development is required to be located in the least biologically sensitive area feasible. Should more than 25 percent encroachment be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area(s) proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.4.2 of the Final MSCP Plan (1998). All MHPA boundary line adjustments require City discretionary approval and Wildlife Agencies approval.

In addition, in some cases at the community plan level or during a subsequent specific project review, some areas of the MHPA that were placed over legal development in 1997 may be able to process a MHPA boundary line correction (BLC) which is reviewed by City MSCP staff. A MHPA BLC will typically be considered by the City when it can be shown that there is a discrepancy between the adopted MHPA boundary and other mapping information (e.g., aerial photography, vegetation maps, topographic maps), which results in inclusion of existing developed areas in the MHPA due to the regional scale of the MHPA mapping.

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 the adoption of the MSCP (March 1997); OR 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 avert the applicant from having to otherwise comply with the City's MSCP Land Use Adjacency Guidelines.

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by State and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's ESL Ordinance as implemented through compliance.

2.3.2.3 Applicable Multiple Species Conservation Program Subarea Plan Policies, Guidelines, Directives and Objectives

MSCP Subarea Plan compliance is required by projects in and adjacent to the MHPA. MHPA compliance is considered a regulatory requirement with associated indirect impacts averted via the required compliance. Standard compliance measures are therefore included as discretionary permit requirements rather than in the CEQA Mitigation Monitoring and Reporting Plan and as project features for ministerial projects. Depending on the circumstances, some covered species-specific requirements (i.e., required conditions of coverage found in Appendix A of the MSCP Subarea Plan) may, however, be required to be included as CEQA mitigation measures.

Multiple Species Conservation Program Section 1.4

According to Section 1.4.1 of the City's MSCP Subarea Plan (1997a), the following land uses are considered conditionally compatible with the biological objectives of the MSCP and, thus, will be allowed within the MHPA: passive recreation, utility lines and roads in compliance with policies in

Section 1.4.2, limited water facilities and other essential public facilities, limited low-density residential uses, brush management (zone 2), and limited agriculture.

Section 1.4.2 lists general planning policies and design guidelines that should be applied in the review and approval of development projects within or adjacent to the MHPA. The following guidelines may be applicable to the CCPU area:

Roads and Utilities–Construction and Maintenance Policies

- 1) All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way, and disturbed areas, minimizing habitat fragmentation.
- 2) All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP Covered species, and wetlands. If avoidance is infeasible, mitigation will be required.
- 3) Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.
- 4) Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.
- 5) Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.
- 6) Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible of the MHPA in order to minimize impacts and fragmentation of sensitive species and habitat. If roads cross the MHPA, they should provide for fully functional wildlife movement capability. Bridges are the preferred method of providing for movement, although culverts in selected locations may be acceptable. Fencing, grading, and plant cover should be provided where needed to protect and shield animals and guide them away from roads to appropriate crossings.
- 7) Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.

- 8) For the most part, existing roads and utility lines are considered a compatible use within the MHPA and, therefore, will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5 of the MSCP.

Fencing, Lighting, and Signage

- 1) Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA (e.g., use of chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain sensitive species or habitats [e.g., vernal pools]).
- 2) Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.
- 3) Signage will be limited to access and litter control and educational purposes.

Materials Storage

- 1) Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.

Mining, Extraction, and Processing Facilities

- 1) Mining operations include mineral extraction, processing and other related mining activities (e.g., asphaltic processing). Currently permitted mining operations that have approved restoration plans may continue operating in the MHPA. New or expanded mining operations on lands conserved as part of the MHPA are incompatible with MSCP preserve goals for covered species and their habitats unless otherwise agreed to by the wildlife agencies at the time the parcel is conserved. New operations are permitted in the MHPA if: 1) impacts have been assessed and conditions incorporated to mitigate biological impacts and restore mined areas; 2) adverse impacts to covered species in the MHPA have been mitigated consistent with the Subarea Plan; and 3) requirements of other City land use policies and regulations (e.g., Adjacency Guidelines, Conditional Use Permit) have been satisfied. Existing and any newly permitted operations adjacent to or within the MHPA shall meet noise, air quality and water quality regulation requirements, as identified in the conditions of any existing or new permit, in order to adequately protect adjacent preserved areas and covered species. Such facilities shall also be appropriately restored upon cessation of mining activities.
- 2) All mining and other related activities must be consistent with the objectives, guidelines, and recommendations in the MSCP plan, the City of San Diego's Environmentally Sensitive Lands Ordinance, all relevant long-range plans, as well as with the State Surface Mining and Reclamation Act (SMARA) of 1975.

- 3) Any sand removal activities should be monitored for noise impacts to surrounding sensitive habitats, and all new sediment removal or mining operations proposed in proximity to the MHPA, or changes in existing operations, must include noise reduction methods that take into consideration the breeding and nesting seasons of sensitive bird species.
- 4) All existing and future mined lands adjacent to or within the MHPA shall be reclaimed pursuant to SMARA. Ponds are considered compatible uses where they provide native wildlife and wetland habitats and do not conflict with conservation goals of the MSCP and Subarea Plan.
- 5) Any permitted mining activity including reclamation of sand must consider changes and impacts to water quality, water table level, fluvial hydrology, flooding, and wetlands and habitats upstream and downstream, and provide adequate mitigation.

Flood Control

- 1) Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.
- 2) No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.
- 3) No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.

Multi-Habitat Planning Area Land Use Adjacency Guidelines

Section 1.4.3 of the MSCP Subarea Plan addresses land uses planned or existing adjacent to the MHPA (MHPA Land Use Adjacency Guidelines) including single and multiple family residential, active recreation, commercial, industrial, agricultural, landfills, and extractive uses. Per this section, land uses adjacent to the MHPA must be managed to ensure minimal impacts to the MHPA. Good planning principles in relation to adjacent land uses as described below are required in these areas. The following MHPA Land Use Adjacency Guidelines are guidelines that must be addressed, on a project-by-project basis, during either the planning (new development) or management (new and existing development) stages to minimize impacts and maintain the function of the MHPA. Implementation of these guidelines is addressed further in Section 1.5, Framework Management Plan which is further described below. All future discretionary and ministerial projects within or adjacent to the MHPA are required to comply with the MHPA Land Use Adjacency Guidelines. These guidelines, including any necessary preconstruction surveys, would be required as a

condition of project approval and required to be included on construction and grading plans for subsequent projects within the CCPU area.

MHPA Land Use Adjacency Guidelines to be applied to applicable projects are as follows:

Drainage:

- 1) All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxics:

- 2) Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, or that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

Lighting:

- 3) Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Noise:

- 4) Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

Barriers:

- 5) New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA

boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Invasives:

- 6) No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Brush Management:

- 7) New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size that is currently required by SDMC regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards (i.e., to avoid the nesting season and preferentially remove non-natives over natives) and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Grading/Land Development

- 8) Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Framework Management Plan Section 1.5

The MSCP Subarea Plan Framework Management Plan, included in Section 1.5.1 of the City's MSCP Subarea Plan, sets management goals and objectives that apply to the CCPU area. Compliance with this section is to achieve the overarching MSCP goal to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region. Draft Clairemont CPU policies are consistent with MSCP framework management plan objectives. Further, all individual projects within the planning area would undergo project review to ensure conformance with all MSCP policies.

To ensure that the goals of the MHPA is attained and fulfilled, management objectives for the MHPA are as follows:

- 1) To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.
- 2) To protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.

- 3) To enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat.
- 4) To facilitate monitoring of selected target species, habitats, and linkages to ensure long-term persistence of viable populations of priority plant and animal species and to ensure functional habitats and linkages.
- 5) To provide for flexible management of the preserve that can adapt to changing circumstances to achieve the above objectives.

To support the objectives, Section 1.5.2 provides general management directives that apply throughout the Subarea Plan area that are therefore applicable to the CCPU area as follows:

Mitigation

Mitigation, when required as part of project approvals, shall be performed in accordance with the City's ESL Regulations and Biology Guidelines.

Restoration

Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.

Public Access, Trails, and Recreation

Priority 1:

- 1) Trails will be the minimum width necessary to preserve corridors (approximately two to four feet wide), will utilize native soil when it provides good draining capabilities, and will out-slope 3-8% to prevent erosion.
- 2) Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access to satisfy mitigation requirements.
- 3) Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.

- 4) In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance, as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood crossjoints, edge plantings of native grasses, and mulching of the trail.
- 5) Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Exceptions are for areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.
- 6) Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except for law enforcement, preserve management or emergency purposes. Restore disturbed areas to native habitat where possible or critical or allow to regenerate.
- 7) Limit recreational uses to passive uses such as birdwatching, photography and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.
- 8) Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.
- 9) Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g. grass-lined) swale or basin to detain runoff and remove pollutants.

Litter/Trash and Materials Storage

Priority 1:

- 1) Remove litter and trash on a regular basis. Post signage to prevent and report littering in trail and road access areas. Provide and maintain trash cans and bins at trail access points.
- 2) Impose penalties for littering and dumping. Fines should be sufficient to prevent recurrence and also cover reimbursement of costs to remove and dispose of debris, restore the area if needed, and to pay for enforcement staff time.
- 3) Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.
- 4) Keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.

Priority 2:

- 1) Evaluate areas where dumping recurs for the need for barriers. Provide additional monitoring as needed (possibly by local and recreational groups on a "Neighborhood Watch" type program) and/or enforcement.

Adjacency Management Issues

The following management directives are in addition to those outlined in Section 1.4.3 and refer more specifically to management and monitoring requirements.

Priority 1:

- 1) Enforce, prevent, and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis.
- 2) Disseminate educational information to residents adjacent to and inside the MHPA to heighten environmental awareness, and inform residents of access, appropriate plantings, construction, or disturbance within MHPA boundaries, pet intrusion, fire management, and other adjacency issues.
- 3) Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.

Invasive Exotics Control and Removal

Priority 1:

- 1) Do not introduce invasive non-native species into the MHPA. Provide information on invasive plants and animals harmful to the MHPA, as well as on prevention methods, to visitors and adjacent residents. Encourage residents to voluntarily remove invasive exotics from their landscaping.
- 2) Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MHPA as funding or other assistance becomes available. If possible, it is recommended that removal begin upstream and/or upwind and move downstream/downwind to control reinvasion. Priorities for removal should be based on invasive species' biology (time of flowering, reproductive capacity, etc.), the immediate need of a specific area, and where removal could increase the habitat available for use by covered species such as the least Bell's vireo. Avoid removal activities during the reproductive seasons of sensitive species and avoid/minimize impacts to sensitive species or native habitats. Monitor the areas and provide additional removal and apply herbicides if necessary. If herbicides are necessary, all safety and environmental regulations must be observed. The use of heavy equipment, and any other potentially harmful or impact-causing methodologies, to remove the plants may require some level of environmental or biological review and/or supervisions to ensure against impacts to sensitive species.

Priorities for removal should be based on invasive species' biology (time of flowering, reproductive capacity, etc.), the immediate need of a specific area, and where removal could increase the habitat available for use by covered species such as the least Bell's vireo and gnatcatcher. Avoid removal activities during the reproductive seasons of sensitive species and avoid/ minimize impacts to sensitive species or native habitats. Monitor the areas and provide additional removal and apply herbicides if necessary. If herbicides are necessary, all safety and environmental regulations must be observed. The use of heavy equipment and any other potentially harmful or impact-causing

methodologies to remove the plants may require some level of environmental or biological review and/or supervision to ensure against impacts to sensitive species.

Priority 2:

- 1) If funding permits, initiate a baseline survey with regular follow-up monitoring to assess invasion or re-invasion by exotics, and to schedule removal. Utilize trained volunteers to monitor and remove exotic species as part of a neighborhood, community, school, or other organization's activities program. If done on a volunteer basis, prepare and provide information on methods and timing of removal to staff and the public if requested.
- 2) Conduct an assessment of the need for cowbird trapping in each area of the MHPA where cattle, horses, or other animals are kept, as recommended by the habitat management technical committee in coordination with the wildlife agencies.
- 3) If eucalyptus trees die or are removed from the MHPA area, replace with appropriate native species. Ensure that eucalyptus trees do not spread into new areas, nor increase substantially in numbers over the years. Eventual replacement by native species is preferred.
- 4) On a case by case basis some limited trapping of non-native predators may be necessary at strategic locations, and where determined feasible to protect ground and shrub-nesting birds, lizards, and other sensitive species from excessive predation. This management directive may be considered a Priority 1 if necessary, to meet the conditions for species coverage. If implemented, the program would only be on a temporary basis and where a significant problem has been identified and therefore needed to maintain balance of wildlife in the MHPA. The program would be operated in a humane manner, providing adequate shade and water, and checking all traps twice daily. A domestic animals release component would be incorporated into the program. Provide signage at access points and noticing of adjacent residents to inform people that trapping occurs, and how to retrieve and contain their pets.

Flood Control

The following management directives are in addition to the general planning policies and guidelines outlined in Section 1.4.2.

Priority 1:

- 1) Perform standard maintenance, such as clearing and dredging of existing flood channels, during the non-breeding or nesting season of sensitive bird or wildlife species utilizing the riparian habitat. For the least Bell's vireo, the non-breeding season generally includes mid-September through mid-March.

Priority 2:

- 1) Review existing flood control channels within the MHPA periodically (every 5 to 10 years) to determine the need for their retention and maintenance, and to assess alternatives, such as restoration of natural rivers and floodplains.

Multiple Species Conservation Program Subarea Plan-Urban Area

Within the MSCP Subarea Plan, the CCPU area is identified respectively within Section 1.2.3 and 1.5.7 as being in an “Urban Area” and as containing “Urban Habitat Lands”. The urban habitat areas within the City’s MHPA consist mainly of vernal pool areas, urbanized canyons and stream areas, and associated hillsides which support native habitats and species and promote wildlife movement.

Section 1.5.7 also discusses Overall Management Policies and Directives for Urban Habitats as follows:

- 1) Where MHPA is incorporated as part of natural resource park, the City Park and Recreation Department shall govern management of those lands in accordance with a Natural Resource Management Plan (NRMP). Current NRMPs in the Urban Lands include: Mariam Bear NRMP, Tecolote Canyon Natural Park Natural Resource Management Plan, Mission Bay Park NRMP, First San Diego River Improvements Project, and the Los Peñasquitos Canyon Preserve NRMP.
- 2) All urban lands that are designated as MHPA shall be managed according to the Subarea Plan general policies and directives.
- 3) Special management needs or issues for specific Urban Habitat Lands should be resolved by the MHPA Preserve Managers according to an appropriate adaptive management strategy and through coordination with the MSCP habitat management technical committee. All management actions resolved in this manner should be documented, and all follow up actions, including monitoring, should also be documented in order to determine trends, and gain knowledge and feedback useful for continued management of these lands.

Future development within areas identified as Urban Habitats, including the CCPU area, is required to support the overall goals and objectives for urban habitat lands. The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is as a system of canyons that provide habitat for native species remaining in urban areas, i.e., as “stepping stones” for migrating birds and those establishing new territories, and providing environmental educational opportunities for urban dwellers of all ages. The system of urban habitat canyons and natural open space throughout the City provides important areas for people to enjoy and learn about the natural world and local environment. These areas also afford visual beauty and psychological relief from urbanization, while supporting habitat for the maintenance of both common and rare species. These habitats; surrounded by development and modified by urban edge effects; also present unique opportunities for research into habitat fragmentation, viability, and urban wildlife ecology.

Covered species found in the urban habitat lands include those known to be in the CCPU area or those having a high to moderate potential to be found in the CCPU area are analyzed in Section 3 and 4. Plant species that have been reported within the CCPA or have a moderate-to-high potential for occurrence within the CCPA include: Orcutt’s brodiaea, Palmer’s goldenbush, San Diego barrel cactus, San Diego thorn mint, San Diego mesa mint, San Diego goldenstar, wart-stemmed ceanothus, and willowy monardella.

Covered wildlife species that have been reported or have a moderate-to-high potential for occurrence within the CCPA include: Cooper’s hawk, Southern California rufous-crowned sparrow,

burrowing owl, northern harrier, American peregrine falcon, southwestern willow flycatcher, coastal California gnatcatcher, least Bell's vireo, and orange-throated whiptail, and coast horned lizard.

Note that all MSCP covered species have Area Specific Management Directives (ASMDs) that are conditions of coverage under the MSCP program. Many of these relate to MHPA land management activities; however, some must be addressed during project processing. All projects within the Clairemont planning area will be assessed for compliance with MSCP policies, including ASMDs, during project permitting.

Other issues to be addressed in Urban Areas (pursuant to the MSCP Subarea Plan Section 1.5.7) and to be supported by polices for the CCPU area include the following:

- Intense land uses and activities adjacent to and in MSCP Covered Species habitat
- Dumping, litter, and vandalism;
- Itinerant living quarters;
- Utility, facility and road repair, construction, and maintenance activities;
- Exotic (non-native), invasive plants and animals; and
- Urban runoff and water quality.

Because the majority of natural areas within the CCPU area such as Tecolote Canyon, are addressed within the City's MHPA, CCPU policies foster MHPA Management Objectives. Policies currently included provide for restoration of habitat, removal of invasive plant species, avoiding impacts to natural habitat, and protection of drainages.

2.3.3 VERNAL POOL HABITAT CONSERVATION PLAN

In October 2017, the City completed the VPHCP (City 2017). The VPHCP is a comprehensive plan to provide conservation of vernal pool habitats and seven sensitive species that do not have coverage under the City's MSCP Subarea Plan. The VPHCP encompasses the entire City and MSCP Subarea Plan coverage area of approximately 206,124 acres and includes some lands owned by the City that are within unincorporated San Diego County (e.g., Cornerstone Lands which include water supply areas for the City). Some lands within the City limits are not under City jurisdiction (e.g., school districts, water districts, federal and state lands, etc.) and are not automatically covered by the VPHCP; however, those landowners can seek coverage under the VPHCP through a Certificate of Inclusion.

In addition to authorizing take of sensitive vernal pool species, the VPHCP serves to expand the City's MHPA (see Section 4.1.2 below), with focus on management and conservation of vernal pool habitats and their associated species, particularly the covered species of the VPHCP. The VPHCP is comprised of three Planning Units (PUs); north, central, and south. The CCPU area is located within the central PU of the VPHCP. No vernal pool resources are mapped within the CCPU area but do occur within Linda Vista to the southeast of the CCPU.

The seven species covered under the VPHCP include five plants and two animals, as listed below, that have potential to occur in vernal pool habitat, should it occur within the CCPU in areas that

have not been formally mapped. The CCPU area has the potential to support these covered VPHCP species if vernal pool habitat exists—the most likely place for these to occur would be on clay soils in the northern portion of the CCPU. One species, San Diego mesa mint, is known to occur in this area in the San Clemente Canyon near the NE intersection of I-805 and Clairemont Mesa Boulevard. Species include:

- Otay Mesa mint (*Pogogyne nudiuscula*); FE and SE
- San Diego mesa mint (*Pogogyne abramsii*); FE and SE
- Spreading navarretia (*Navarretia fossalis*); FT
- San Diego button-celery (*Eryngium aristulatum* var. *parishii*); FE and SE
- California Orcutt grass (*Orcuttia californica*); FE and SE
- Riverside fairy shrimp (*Streptocephalus woottoni*); FE
- San Diego fairy shrimp (*Branchinecta sandiegonensis*); FE

The VPHCP identifies four covered projects and three planned projects, none of which are located within the CCPU area. Any future proposed development not included as one of the four covered projects or three planned projects, and actions not included in the list of covered activities (i.e., land use and public infrastructure and conservation activities) are required to undergo project specific analyses (including applicable public environmental review) to identify vernal pool resources and evaluate impacts and provide any required avoidance/mitigation relative to the provisions of the VPHCP. A list of covered activities and the allowable conditions within the VPHCP are described in Section 4 of the VPHCP. If a future proposed project is determined by the City to be consistent with the requirements of the VPHCP, the project could be authorized to impact vernal pools and covered species through the City's VPHCP ITP.

Regardless of impact authorization, the VPHCP first requires all feasible impacts to be avoided and/or minimized to limit any impact to vernal pools and their associated species. Such measures include, but are not limited to redesigning a project to avoid resources; performing pre-construction biological surveying; translocating soils, propagules, and/or species; conducting biological monitoring throughout project construction; conducting contractor environmental awareness training; directing project run-off away from vernal pools; installing temporary construction fencing to protect off-site vernal pools; installing artificial watering to control/eliminate fugitive dust; conducting seasonally timed grading operations; top soil salvaging; installing permanent protective fencing; and conducting other typical general construction Best Management Practices (BMPs).

2.3.4 GENERAL PLAN

The City's General Plan Amendment (Blueprint SD) presents the current goals and policies for biological resources in the Conservation Element (City 2024a). Relevant excerpts from this element that may be applicable to the CCPA are included below in Table 2. The CCPU will incorporate the City's current General Plan Conservation Element policies and goals (which cover biological resources and were updated with the adoption of the VPHCP in 2018).

Table 2. City of San Diego General Plan Conservation Element Policies Relating to Biological Resources within the Clairemont Community Planning Area

Policy	Description
CE-B.1	Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities. a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands, and implementation of the VPHCP. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect, restore and enhance urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally, including environmental education and recreation opportunities, as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plants and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan and VPHCP. g. Protect, restore and preserve wetland and upland areas on City managed lands, prioritizing areas with the greatest needs. h. Prepare and update Natural Resource Management Plans on all managed preserved lands and include in plans considering shifting habitat or conditions due to climate change as well as sequestration potential, as the information becomes available. i. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation. i. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
CE-B.2	Apply the appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands. a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits. b. Limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.
CE-B.4	Limit and control runoff, sedimentation, and erosion both during and after construction activity.
CE-C.2	Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans (see also Land Use Element, Policy LU-E-1).

Policy	Description
CE-C.4	Manage wetland areas as described in Section H, Wetlands, for natural flood control, climate resilience benefits, and preservation of landforms.
CE-C.6	Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.
CE-D.3	Continue to participate in the development and implementation of watershed management plans. a. Control water discharge in a manner that does not reduce reasonable use by others, damage important native habitats and historic resources, or create hazardous conditions (e.g., erosion, sedimentation, flooding and subsidence). b. Protect reservoir capacity from sedimentation. c. Improve and maintain drinking water quality and urban runoff water quality through implementation of Source Water Protection Guidelines for New Development. d. Improve and maintain urban runoff water quality through implementation of storm water protection measures (see also Urban Runoff Management, Section E). e. Encourage proper sustainable agricultural practices (if applicable) such as tillage, use of grass filter strips, runoff detention basins, and organic farming.
CE-E.1	Continue to develop and implement public education programs. a. Involve the public in addressing runoff problems associated with development and raising awareness of how an individual's activities contribute to runoff pollution. b. Work with local businesses and developers to provide information and incentives for the implementation of Best Management Practices for pollution prevention and control. c. Implement watershed awareness and water quality educational programs for City staff, community planning groups, the general public, and other appropriate groups.
CE-E.2	Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff. a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs. e. Increase the use of plants in drainage design. f. Maintain landscape design standards that minimize the use of pesticides and herbicides. g. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. h. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. i. Enforce maintenance requirements in development permit conditions.

Policy	Description
	j. Increase the use of green infrastructure, both at watershed scale and site-specific locations.
CE-E.3	Require contractors to comply with accepted storm water pollution prevention planning practices for all projects. a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.
CE-E.4	Continue to participate in the development and implementation of Water Quality Improvement Plans for water quality and habitat protection.
CE-E.5	Ensure that City departments continue to use "Best Practice" procedures so that water quality objectives are routinely implemented. Incorporate water quality objectives into existing regular safety inspections. a. Follow BMPs and hold training sessions to ensure that employees are familiar with those practices. b. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources. c. Ensure that contractors used by the City are aware of and implement urban runoff control programs. d. Serve as an example to the community-at-large.
CE-E.6	Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system. a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations. b. Review plans for new development and redevelopment for connections to the storm drain system. c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.
CE-E.7	Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.
CE-G.1	Preserve natural habitats pursuant to the MSCP and VPHCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability. a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within the MHPA, VPHCP, and open space.
CE-G.2	Prioritize, fund, acquire, and manage the MHPA, VPHCP, and open spaces that preserve important ecological resources and provide habitat connectivity.
CE-G.3	Implement the conservation goals/policies of the City's MSCP Subarea Plan and VPHCP, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.

Policy	Description
CE-G.4	Protect important ecological resources when applying floodplain regulations and development guidelines.
CE-G.5	Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.
CE-G.6	Utilize programs, such as Biodiverse SD, to preserve habitat and open space in core biological resource areas, mitigating impacts of new development while maintaining conservation goals.
CE-G.7	Preserve the network of habitat and open space through delineation of core biological resource areas identified in the Multi-Habitat Planning Area (MHPA) consistent with the City's Biodiverse SD program, inclusive of the Vernal Pool Habitat Conservation Plan (VPHCP), and Multiple Species Conservation Plan (MSCP), which acts as the natural communities conservation program.
CE-H.1	Use a watershed planning approach to preserve, enhance, and restore wetlands.
CE-H.2	Facilitate public-private partnerships that improve private, federal, state and local coordination through removal of jurisdictional barriers that limit effective wetland management.
CE-H.3	Seek state and federal legislation and funding that support efforts to research, classify, and map wetlands including vernal pools and their functions, and improve restoration and mitigation procedures.
CE-H.4	Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.
CE-H.5	Restore salt marshland and other associated tidal wetland and riparian habitats where feasible.
CE-H.6	Support research and demonstration projects that use created wetlands to help cleanse urban and storm water runoff, where not detrimental to natural upland and wetland habitats.
CE-H.8	Encourage site planning that maximizes the potential biological, historic, hydrological, climate resilience, and land use benefits of wetlands.
CE-H.9	Implement a "no net loss" approach to wetlands conservation in accordance with all city, state, and federal regulations.
CE-J.1	Develop, nurture, and protect a sustainable urban/community forest. a. Identify City lands and spaces that need trees and identify ways to increase permeable areas for new trees, focused in areas with the greatest needs. b. Seek resources and take actions needed to plant, care for, and protect trees in the public right-of-way and parks and those of significant importance in our communities. Prioritize implementation in areas with the greatest needs. c. Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits. Prioritize implementation in areas with the greatest needs. d. Seek to retain significant and mature trees. e. Provide forest linkages to connect and enhance public parks, plazas, recreation and open space areas (see also Mobility Element, Policies ME-A.6 and ME-A.7, and Recreation Element, Policy RED.6).
CE-J.2	Include community street tree master plans in community plans. a. Prioritize community streets for street tree programs.

Policy	Description
	b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form. c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.
CE-J.3	Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan (see Conservation Element Policy CE-J.1).
CE-J.4	Continue to require the planting of trees through the development permit process. a. Consider tree planting as mitigation for air pollution emissions, storm water runoff, and other environmental impacts as appropriate.
CE-J.5	Support public outreach efforts to educate City staff, the business community, and the general public on the environmental and economic benefits of trees.

2.4 CLAIREMONT COMMUNITY PLAN POLICIES

The adopted Clairemont Community Plan presents goals and policies for biological resources which are consistent with all City regulations and policies and goals of the General Plan. The General Plan is the foundation for all land use decisions in San Diego, while the Clairemont Community Plan is a part of the Land Use element of the General plan and covers the specific geographic boundary of Clairemont. Regulations covered above are applicable within the CCPA and discussed in further detail within Sections 3 and 4 of this document. The proposed project is to update this community plan, so the project would not conflict with the existing community plan.

2.5 Marian Bear Memorial Park Natural Resource Management Plan

The Marian Bear Memorial Park NRMP, adopted in 1994, establishes the value of biological resources found in the park and provides guidelines for the protection, enhancement, and use of these resources. The NRMP guides future management of the park to protect natural resources while accommodating safe and accessible community use. The objectives of the NRMP are:

- 1) To establish management practices which will preserve and protect biological resources while providing for future recreational use, maintenance, and land use in Marian Bear Memorial Park;
- 2) To emphasize improvements needed for environmental protection, interpretation, picnicking, hiking, bicycling, and other low intensity recreational activities;
- 3) To ensure that all improvements and maintenance consider and provide for public safety;
- 4) To protect cultural, historical, paleontological, and archaeological resource sites;
- 5) To ensure all individual projects proposed within the Park meet CEQA and City environmental and construction standards;
- 6) To selectively enhance and restore the native vegetation in the Park;
- 7) To maintain access paths, trails, parking lots, and roads within the Park in a natural condition in order to blend with the native character of the Park;
- 8) To control problem erosion along trails and streambeds throughout the Park;
- 9) To discourage illegal activities;

- 10) To develop a reporting and enforcement procedure to prevent encroachment upon the canyons;
- 11) To improve Park ingress and egress; and
- 12) To discourage the placement of a paved, Class 1 bikeway within the Park, encourage its placement within the CALTRANS right-of-way and other nonpark land, and ensure an environmental impact analysis is completed prior to any construction.

3 Methods

This biological resources report was prepared to support a programmatic community plan. Because this is a general/programmatic-level analysis, existing databases and literature were used exclusively in preparation of the report per lead agency direction. Please note that no project-specific surveys or mapping were performed as part of this effort, and no focused species surveys or comprehensive species lists were prepared. Future projects located within the CCPU area will be required to undergo future site-specific environmental review, including site-specific biological surveys and project-specific impact analysis for projects that may impact biological resources. At that point, field surveys and a more detailed biological impact analysis will be performed at the individual project level.

As such, this discussion is intended to give an overview of biological resources that occur, or may occur, within the CCPA; it is not intended to be exhaustive of all habitats or species in the area.

3.1 GENERAL BIOLOGICAL DATABASE AND LITERATURE REVIEW

Rocks Biological Consulting (RBC) conducted reviews of biological resource databases and of pertinent literature to inform the discussions and conclusions of this report. While anecdotal and citizen science data can provide additional information on biological resources throughout the community planning area, the quality and reliability of this data is not consistent. Therefore, the literature review and database searches conducted for this report were limited to the reliable, peer-reviewed databases described below.

The sources for the literature and database review included the reliable, peer-reviewed data included in the following resources:

- California Department of Fish and Wildlife (CDFW) Natural Diversity Data Base (CNDDB)
- California Native Plant Society (CNPS) Online Rare Plant Inventory
- Consortium of California Herbaria online records of plant occurrences
- Rare plants of San Diego County (Reiser 2001)
- CNPS Vegetation Program VegCamp data in the online Manual of California Vegetation
- Manual of California Vegetation (Sawyer and Evens 2009)
- U.S. Fish and Wildlife Service (USFWS) species and critical habitat databases (USFWS 2025 b,c,d)

- Multiple Species Conservation Program (MSCP; County of San Diego Final MSCP Program; and City of San Diego MSCP Subarea Plan)
- U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2020)
- USFWS National Wetlands Inventory
- San Diego County Special Animals List (2014)
- San Diego County Bird Atlas (Unitt 2004)
- San Diego County Mammal Atlas (Tremor, Stokes, Spencer, et al. 2017)
- San Diego Geographic Information Source (SanGIS) Vegetation Information in the San Diego Region (2012, 2015; data compiled 1992)
- City Vernal Pool Habitat Conservation Plan (VPHCP)
- San Diego Association of Governments San Diego Management and Monitoring Program

3.2 SOURCES REVIEWED TO DETERMINE HABITATS, FLORA, AND FAUNA

In addition to the use of the above generalized databases and literature sources, several Clairemont Mesa or City-wide projects and their CEQA review information were utilized to further verify and refine information about the community plan area habitats, flora, fauna, and their relative sensitivity. Contributing projects include: Morena Pipeline Project No. 583432 Mitigated Negative Declaration (MND; City of San Diego 2011); Morena Corridor Specific Plan (City of San Diego 2019b); Balboa Avenue Station Area Specific Plan (City of San Diego 2019a); Mount Etna Community Plan Amendment and Rezone Project Final Environmental Impact Report (FEIR [City of San Diego 2020b]); Pure Water San Diego North City Project Final Environmental Impact Report (FEIR [City of San Diego 2018]); and the Municipal Waterways Maintenance Plan FEIR (City of San Diego 2020c).

3.2.1 VEGETATION COMMUNITIES

The vegetation community mapping for this report was primarily sourced from the San Diego Geographic Information Source (SanGIS 2012, 2015) digital file for the MSCP. Where more current or detailed vegetation mapping exists from sources listed Section 2.2 above, the data was reviewed and incorporated into the vegetation discussion to provide further detail and updated information on Clairemont biology. Additionally, some vegetation communities were lumped where appropriate and biologically sound, e.g., ‘coastal sage scrub’ was lumped with ‘Diegan coastal sage scrub’ for clearer resource representation.

Vegetation community descriptions in this report follow Oberbauer et al. (2008) with habitat sensitivity tier categories derived from wetland and upland mitigation ratio tables in the City’s Biology Guidelines (2018b) and review of CNPS vegetation information available through VegCamp and the Manual of California online (CNPS 2025). Field surveys were not conducted as part of this BRR preparation; however, as noted above, relevant survey data was used to inform this report.

3.2.2 SENSITIVE PLANTS

Locations of sensitive plant species within the CCPU area discussed herein were primarily sourced from the CNDDDB (CDFW 2025f) with additional information gleaned from documents listed in Section 2.2, above, and 1992 MHPA vegetation maps, which include MSCP species codes with known spatial locations. The sensitivity status of plants is based on federal and state endangered, threatened, and sensitive status lists, as well as local sensitivity designations such as the MSCP covered species and CNPS (California Native Plant Society [CNPS] 2025) rare species.

Common and scientific names for plant species are those presented in the CDFW CNDDDB State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW 2025b).

3.2.3 SENSITIVE WILDLIFE

The locations of sensitive wildlife species were sourced from the CNDDDB (CDFW 2025f), SanBIOS (County of San Diego, 2025), and the USFWS species occurrence database (USFWS 2020a). The sensitivity status information for animals is based on federal and state endangered, threatened, and sensitive status lists, as well as local sensitivity designated by the MSCP covered species list (i.e., the CDFW Special Animals List (CDFW 2025e).

Common and scientific names for wildlife species are those presented in the CDFW CNDDDB State and Federally Listed Endangered and Threatened Animals of California (CDFW 2025b).

4 Existing Conditions

The existing conditions for the CCPA that are presented in this section are based on the most current data available at the time this report was written from the sources listed in Section 3.1, above. No field surveys were conducted because this BRR is intended to provide a programmatic-level analysis of the CCPU, which is a programmatic document. All future proposed projects within the CCPA will be required on a case-by-case project specific basis to provide a detailed evaluation of existing biological resources during the project permitting process.

4.1 PLAN AREA DESCRIPTION

This section provides a brief description of the topography, land uses, soil types, and vegetation communities within the CCPA.

4.1.1 TOPOGRAPHY

The CCPU area has varying elevations from approximately 20 feet above mean sea level (AMSL) in the southwest portion of the CCPU area at the southern end of Bay Park near Mission Bay, and up to approximately 410 feet AMSL in the eastern portion of the plan area along I-805. The majority of the CCPU area is developed, primarily with residential housing. Topography generally increases moving east, and is relatively level (i.e., mesa top, less than 10 percent slopes). Natural, undeveloped areas associated with Marian Bear Memorial Park, Tecolote, Stevenson, and San Clemente Canyons are present in the northern portion of the CCPU area (San Clemente Canyon) and in the center of the CCPU, running north and south (Tecolote Canyon and Stevenson Canyon).

Current aerial imagery of the CCPU area is presented on Figure 3). Portions of the CCPU adjacent to Tecolote Canyon are covered in the City's Steep Hillside Guidelines (2004),

The CCPU area is located within portions of the Mission Bay & La Jolla Watershed Management Area, including the Rose Canyon subwatershed and Tecolote Creek subwatershed, which drain west towards the Pacific Ocean (RWQCB 2016). These watersheds capture approximately 64 square miles. Specifically, the CCPU area lies within the Penasquitos Hydrologic Unit and the Miramar (906.40), and Tecolote (906.50) Hydrologic Areas of the Mission Bay Watershed Management Area Water Quality Improvement Plan (RWQCB 2016; Figure 4).

4.1.2 LAND USE

The CCPU area includes a mixture of land uses, including but not limited to industrial and commercial complexes, business parks, institutional facilities, residential dwellings of various densities, parks and open space, preserve areas, military facilities, and various transportation structures (e.g., arterial roadways and public transportation facilities).

4.1.3 SOILS

The USDA NRCS (U.S. Department of Agriculture [USDA] 2020) identifies 22 soil types within the CCPU area. The soil series present include Altamont clay, Carlsbad-Urban, Chesterton, Corralitos, Gaviota fine sandy loam, Huerhuero loam, made land, Olivenhain cobbly loam, Reiff fine sandy loam, riverwash, Salinas clay loam, and terrace escarpments.

There are two relatively small area of clay soils (i.e., Altamont clay, Salinas clay loam) that are typically associated with vernal pool complexes, which occur in the northern area of the CCPU within the San Clemente Canyon.

FIGURE 3. AERIAL PHOTOGRAPH

 Clairemont Community Plan Boundary

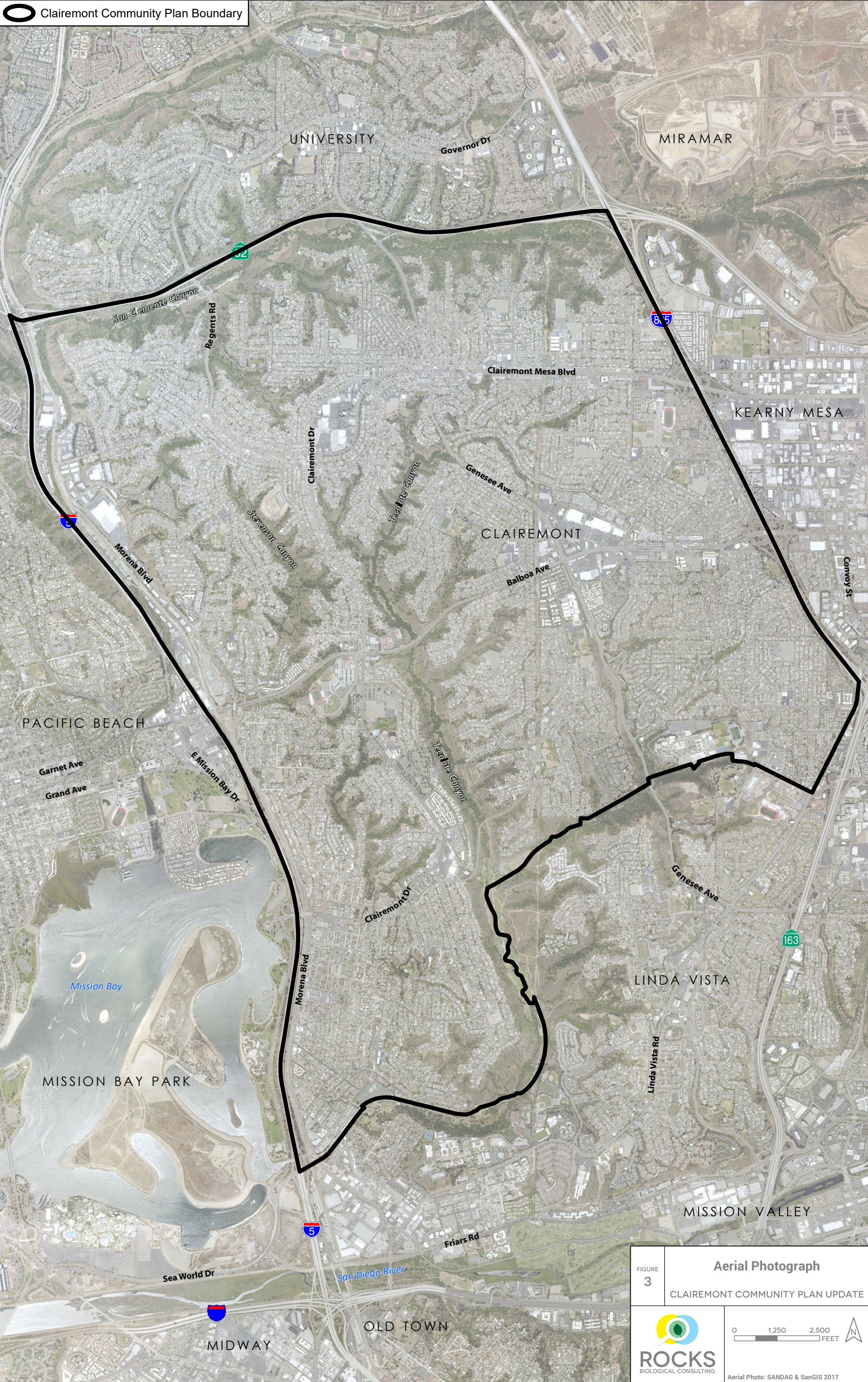
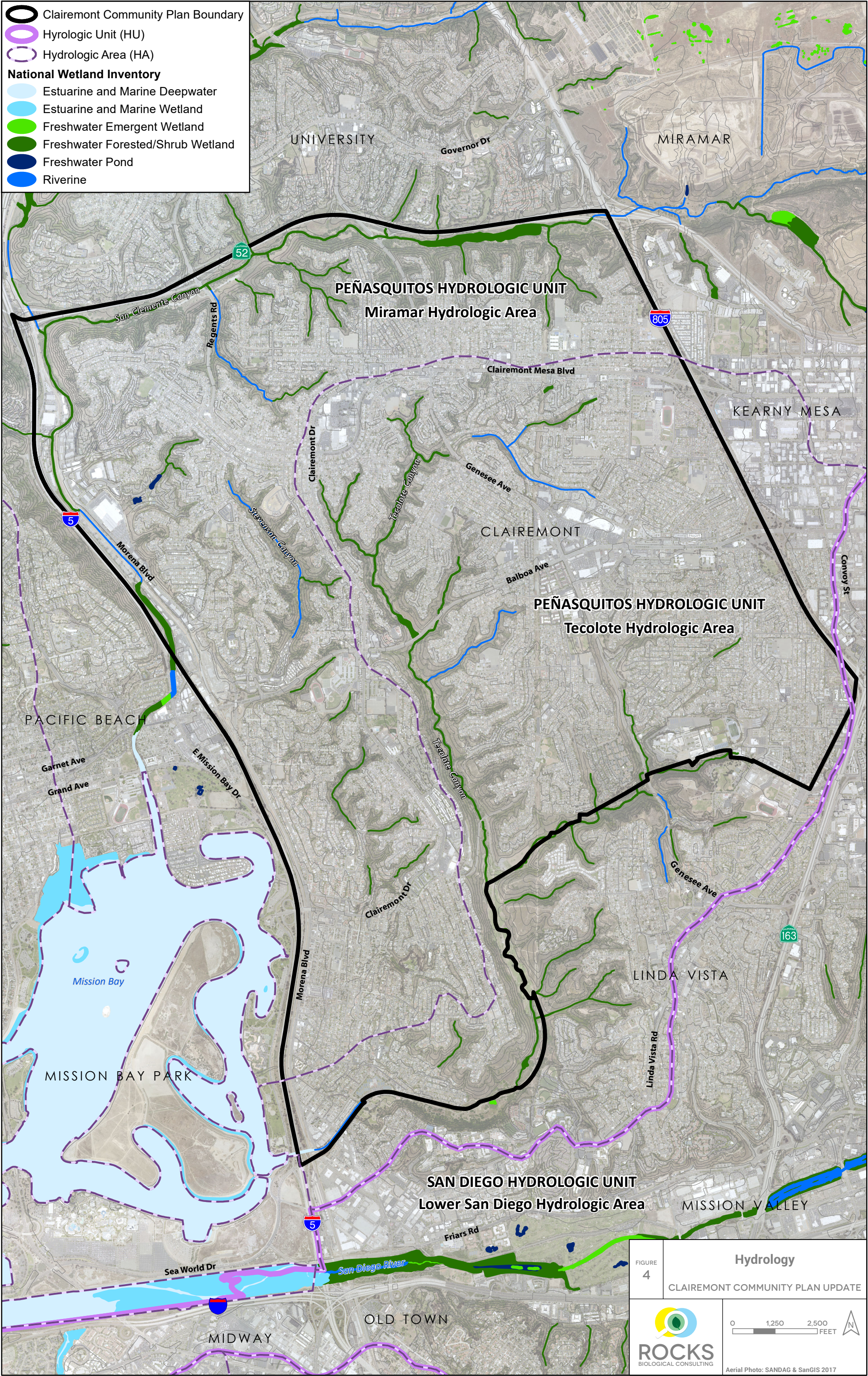


FIGURE 3	Aerial Photograph
	CLAIREMONT COMMUNITY PLAN UPDATE
	0 1,250 2,500 FEET Aerial Photo: SANDAG & SanGIS 2017

FIGURE 4. HYDROLOGY



4.2 VEGETATION COMMUNITIES/LANDCOVER TYPES

The CCPA supports 15 generalized vegetation communities/land cover types based on review of available data sources described in Section 3.2. The approximate acreages of these vegetation communities and land cover types are presented in Table 3 and their spatial habitat distributions within the CCPU area are presented on Figure 5; open space and conserved lands are shown on Figure 6.

Table 3. Vegetation Communities and Land Cover Types in the Clairemont Community Plan Update Area

Vegetation Community or Land Cover Type	Acreage ¹	Tier ³
Wetland²		
Southern Riparian Forest	406.66	N/A
Riparian Woodland	0.28	N/A
Riparian Scrub	47.24	N/A
Non-Native Riparian (disturbed riparian)	11.68	N/A
<i>Subtotal Wetland Communities</i>	<i>465.86</i>	
Sensitive Upland		
Diegan Coastal Sage Scrub (including baccharis-dominated, coastal, and disturbed forms)	622.13	II
Maritime Succulent Scrub	159.09	I
Chaparral	78.04	II
Scrub Oak Chaparral	25.27	I
Southern Maritime Chaparral ³	26.02	I
Native Grassland	0.48	I
Non-Native Grassland	67.77	IIIB
<i>Subtotal Sensitive Upland Communities</i>	<i>978.80</i>	
Other Uplands⁴		
Eucalyptus Woodland	4.44	IV
Non-Native Vegetation	5.34	IV
Disturbed Land	140.29	IV
Urban/Developed	6,944.49	IV
<i>Subtotal Other Uplands</i>	<i>7,094.56</i>	
TOTAL	8,539.22	

¹ Rounded to the nearest 0.1 acre.

² Wetland here does not imply/define U.S. Army Corps of Engineers "wetlands or waters of the U.S." All wetlands listed considered sensitive habitats per City's Biology Guidelines (2018b). City wetlands typically support wetland plant species but also include areas lacking wetland vegetation due to non-permitted filling of previously existing wetlands.

³ Mitigable subtypes (e.g., Southern Maritime Chaparral) will be further distinguished with applicable site- specific surveys. Tiers and habitats are per City's Biology Guidelines (2018b)—minimum ratio given only because ratios are dependent on whether the impacts and mitigation site are inside or outside of the MHPA.

⁴ May be sensitive if they support sensitive species.

FIGURE 5. VEGETATION COMMUNITIES AND LAND COVER TYPES

- Clairemont Community Plan Boundary

Vegetation Communities/Land Cover Types

Southern Riparian Forest

Riparian Woodland

Riparian Scrub

Non-Native Riparian

Diegan Coastal Sage Scrub

Maritime Succulent Scrub

Chaparral

Scrub Oak Chaparral

Southern Maritime Chaparral

Native Grassland

Non-Native Grassland

Non-Native Vegetation

Eucalyptus Woodland

Disturbed Habitat

Urban/Developed

Vernal Pool ¹

¹ No vernal pools are found within the Clairemont community plan boundary.
(Source: City of San Diego Vernal Pool Habitat Conservation Plan)

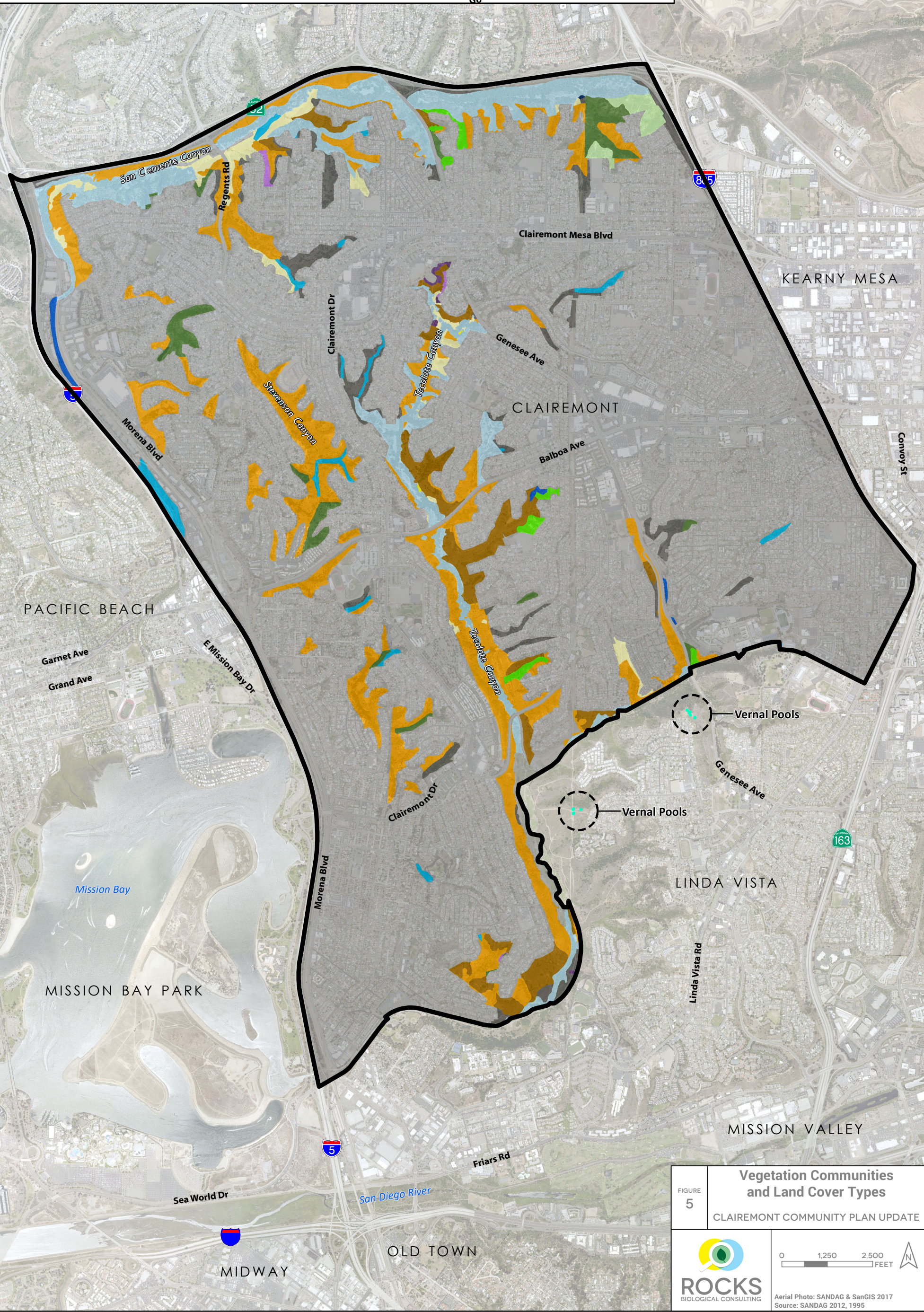


FIGURE 6. CONSERVED LANDS AND OPEN SPACE

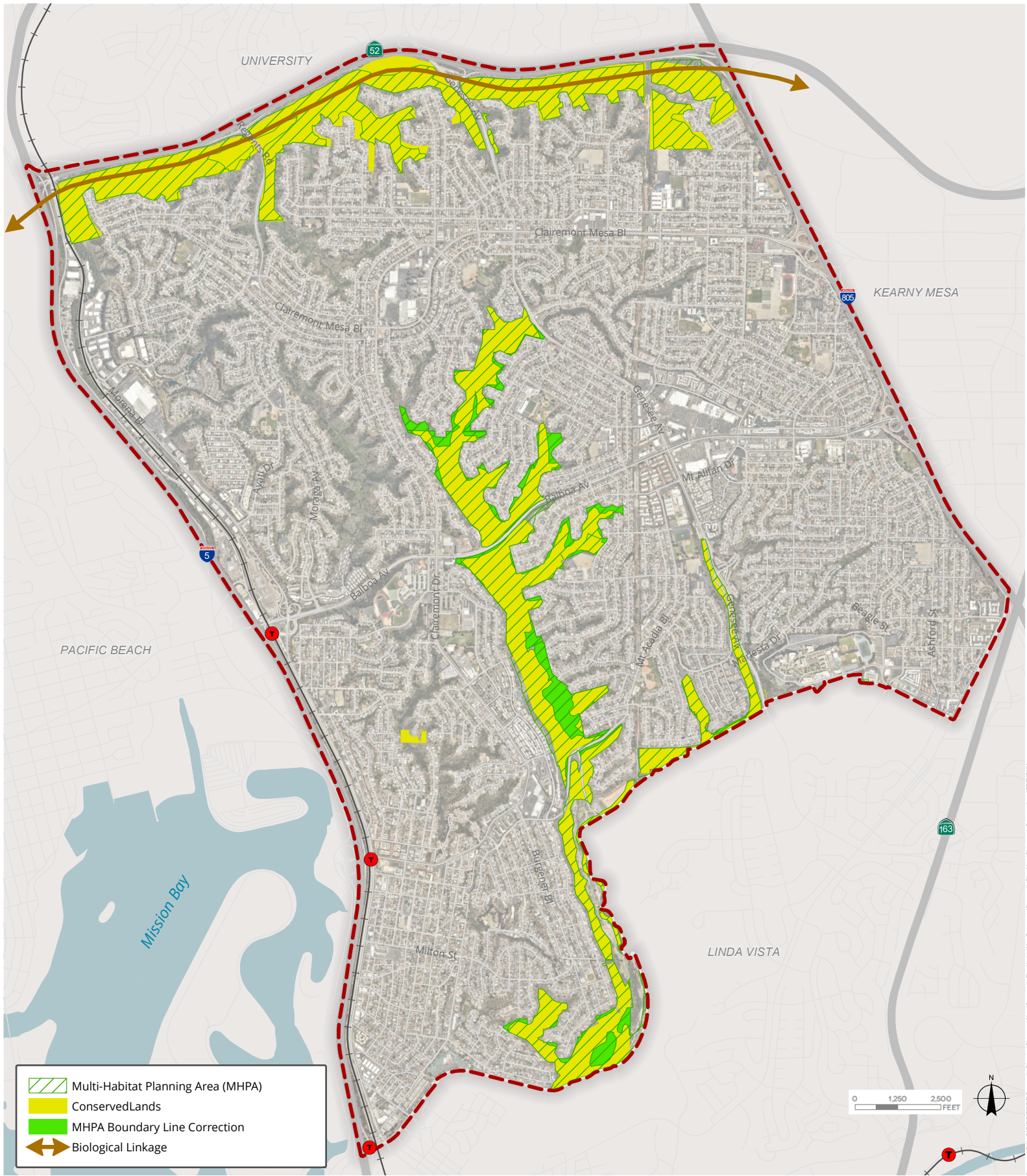


Figure 6: Conserved Land and Open Space

4.2.1 WETLAND COMMUNITIES

Wetland vegetation, including riparian areas, are low-lying lands where association (i.e., saturation or inundation) with water is the primary constituent in soil development and the types of plant and animal species living in the soil and on its surface. Wetland vegetation communities vary widely due to regional and local differences in soils, topography, climate, hydrology, water chemistry, vegetation, and other factors (Environmental Protection Agency 2013). The individual vegetation types identified in public data sources within the CCPA that are typically recognized as wetland communities are described below, including their locations within the CCPU area.

4.2.1.1 Southern Riparian Forest

Southern riparian forest is a general riparian community composed of winter-deciduous trees often found along streams and rivers. Willow (*Salix* spp.), cottonwood (*Populus* spp.), and western sycamore (*Platanus racemosa*) are typical species found in this community with no one species substantially dominating. Associated understory species may include mule fat (*Baccharis salicifolia*), stinging nettle (*Urtica dioica* ssp. *holosericea*), and wild grape (*Vitis girdiana*; Beauchamp 1986).

Southern riparian forest is mapped in both San Clemente Canyon and Tecolote Canyon.

4.2.1.2 Riparian Woodland

Riparian woodland is very similar to southern riparian forest (3.2.1.3 above); however, the differences between woodlands and forests are physiognomic rather than compositional. Woodlands have less canopy cover than forests. In woodlands, there may be large canopy gaps within the upper tree stratum. In forests, the canopies of individual tree species do overlap so that a canopy cover exceeding 100 percent may occur in the upper tree stratum.

Riparian woodland is mapped in one area within the CCPU area: near the east border within San Clemente Canyon.

4.2.1.3 Riparian Scrub

Riparian scrub is a generic term for several shrub dominated communities that occur along drainages and/or riparian corridors including southern willow scrub (See Section 3.2.1.7), mule fat scrub, and tamarisk scrub. This community lacks taller riparian tree species.

Southern riparian scrub occurs in discrete patches throughout the CCPU area.

4.2.1.4 Non-Native Riparian (Disturbed Wetland)

Oberbauer describes Disturbed Wetland (vegetation type 12200) as areas permanently or periodically inundated by water, which have been significantly modified by human activity. Site factors include portions of wetlands with obvious artificial structures such as concrete lining, barricades, riprap, piers, or gates. Often these areas are unvegetated but may contain scattered native or non-native vegetation. Examples include lined channels, Arizona crossings, detention basins, culverts, and ditches. Characteristic species include giant reed (*Arundo donax*), tamarisk (*Tamarix* spp.), eucalyptus (*Eucalyptus* spp.), palm trees (*Phoenix* and *Washingtonia* spp.), pampas

grass (*Cortaderia* spp.), artichoke thistle (*Cynodon dactylon*), and may also contain native wetland species including willow (*Salix* spp.) and cattail (*Typha* spp.).

Within the CCPU area disturbed wetland is mapped in the northwest boundary near I-5. Unmapped disturbed wetlands are also likely to be found in pockets within more pristine habitat adjacent to developed areas.

4.2.2 SENSITIVE UPLAND COMMUNITIES

Upland vegetation communities are found in dry landforms and do not occur in wetland situations (e.g., inundated or containing saturated soils). In the CCPU area, sensitive upland vegetation communities consist of scrub, chaparral, and grasslands. These communities are mostly located along the perimeter of the CCPU area within undeveloped lots and along the hillsides of San Clemente and Tecolote Canyons. Most grasslands within the CCPU area are located adjacent to San Clemente and Tecolote canyons. The individual upland vegetation types mapped within the CCPU area are described below.

4.2.2.1 Diegan Coastal Sage Scrub

Diegan coastal sage scrub is a low, soft-woody, subshrub that may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within Diegan coastal sage scrub include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum* ssp. *fasciculatum*), laurel sumac, lemonadeberry (*Rhus integrifolia*), and black sage (*Salvia mellifera*).

The coastal form of Diegan coastal sage scrub is nearly identical to Diegan coastal sage scrub, except that it is known to occur at lower elevations below 1000 feet AMSL. According to Oberbauer et al. 2008, baccharis scrub is a subtype of coastal sage scrub, but chiefly supports baccharis species such as broom baccharis (*Baccharis sarothroides*) and coyote bush (*Baccharis pilularis*). Areas mapped as disturbed likely contain many of the same shrub species as the undisturbed community, but vegetation cover is sparser and has a higher proportion of non-native, annual plant species.

Within the CCPU area, Diegan coastal sage scrub (including baccharis-dominated, coastal, and disturbed forms) is one of the most abundant natural vegetation communities. It is found along the undeveloped hillsides near and within San Clemente, Tecolote, and Stevenson Canyon, and within undeveloped lands adjacent to roadways. Most of San Clemente and Tecolote Canyon are protected as conservation areas and parks, preserving much of this habitat type within the CCPU area.

4.2.2.2 Maritime Succulent Scrub

Maritime succulent scrub, rare subtype of Diegan coastal sage scrub, is a low open scrub community that is dominated by a mixture of stem and leaf succulent species and drought deciduous species that also occur within sage scrub communities. This vegetation community occurs on thin, rocky or sandy soils, on steep (west or southern) slopes of coastal headlands and bluffs. Maritime succulent scrub is generally restricted to the reach of the coastal fog belt and

extends north to south from about Torrey Pines to southern Baja with island sub-types on San Clemente and Catalina islands. The dominant species typically found within this vegetation community include coast barrel cactus (*Ferocactus viridescens*), velvet cactus (*Bergerocactus emoryi*), prickly pear cactus (*Opuntia littoralis*), cliff spurge (*Euphorbia misera*), dudleya (*Dudleya spp.*), desert thorn (*Lycium californicum*), and California sunflower (*Bahiopsis laciniata*) (Oberbauer et al. 2008).

Within the CCPU area maritime succulent scrub is mapped in the central portion of San Clemente Canyon and in large areas of the Tecolote Canyon.

4.2.2.3 Chaparral

Chaparral is a one- to three-meters tall vegetation community overwhelmingly dominated by drought-tolerant, fire-resistant shrubs like chamise (*Adenostoma fasciculatum*) with little to no herbaceous understory (Oberbauer et al. 2008). Associated species of this community may include ceanothus (*Ceanothus spp.*), manzanita (*Arctostaphylos spp.*), laurel sumac (*Malosma laurina*), scrub oak (*Quercus dumosa*), deerweed (*Acmispon glaber*), and sages (*Salvia spp.*), although they contribute little to cover. This vegetation is adapted to repeated fires by stump sprouting and mature stands are densely interwoven with very little herbaceous understory or litter.

In the CCPU area, chamise chaparral is mapped in discrete areas throughout open space, this generalized habitat may also be considered southern mixed or maritime chaparral at the time site specific surveys are performed.

4.2.2.4 Scrub Oak Chaparral

Scrub oak chaparral is a dense, evergreen shrub up to 20 feet tall, dominated by scrub oak (*Quercus dumosa*) with considerable mountain mahogany (*Cercocarpus betuloides*). Scrub oak chaparral occurs in somewhat more mesic areas than many other chaparrals, such as north facing slopes, and recovers more rapidly from fires than other chaparrals due to resprouting capabilities of scrub oak. This vegetation community often occurs at slightly higher elevations (to 5,000 feet) and substantial leaf litter accumulates (Oberbauer et al. 2008).

Within the CCPU area scrub oak chaparral is mapped in central portions of San Clemente and Tecolote Canyons.

4.2.2.5 Southern Maritime Chaparral

Southern mixed chaparral is composed of broad-leaved sclerophyllous shrubs that can reach 6 to 10 feet in height and form dense often nearly impenetrable stands with poorly developed understories. In this mixed chaparral the shrubs are generally tall and deep rooted, with a well-developed soil litter layer. This vegetation community occurs on dry, rocky, often steep north-facing slopes with lower soil temperatures (Oberbauer et al. 2008). As conditions become more mesic, broad-leaved sclerophyllous shrubs that resprout from underground root crowns become dominant. Depending upon relative proximity to the coast, southern mixed chaparral is dominated by chamise (*Adenostoma fasciculatum*), mission manzanita (*Xylococcus bicolor*), Ramona lilac (*Ceanothus*

tomentosus), white-stem wild-lilac (*Ceanothus leucodermis*), and big-berry manzanita (*Arctostaphylos glauca*).

This vegetation community provides important habitat for wide-ranging, larger wildlife species such as mule deer (*Odocoileus hemionus*), mountain lion (*Felis concolor*), and golden eagle (*Aquila chrysaetos*). Depending on present species, this generalized habitat may also be considered chamise or maritime chaparral. When coast white lilac (*Ceanothus verrucosus*) and/or scrub oak is present with or without other indicator species present, this habitat could be considered Tier I southern maritime chaparral per City's Biology Guidelines (2018b).

Southern maritime chaparral is mapped in the northeastern portion of the CCPU, along the undeveloped hillsides within San Clemente Canyon.

4.2.2.6 Native Grassland

Valley and foothill grassland, a rare native grass, is a native grassland community dominated by perennial native bunchgrasses such as purple needle grass (*Nassella pulchra*) with annual and perennial forbs such as common golden stars (*Bloomeria crocea* ssp. *crocea*) and California blue-eyed grass (*Sisyrinchium bellum*). Native grasslands generally occur on fine-textured soils that exclude the annual, exotic grasses. Almost all of the native grasslands in California have been displaced by non-native grassland dominated by introduced annual species. Native grasslands occur throughout California as small isolated islands.

Within the CCPU area native grasslands occur as isolated, small areas primarily in Tecolote Canyon, although other areas likely occur, but were too small to be identified in this mapping.

4.2.2.7 Non-Native Grassland

Non-native grassland occurs seasonally in response to winter and spring rains and is a dense to sparse cover of annual, non-native grasses, sometimes associated with species of showy-flowered, native, annual forbs. This community characteristically occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species in non-native grassland include oats (*Avena* spp.), red brome (*Bromus madritensis* ssp. *rubens*), ripgut grass (*Bromus diandrus*), ryegrass (*Lolium* sp.), and mustard (*Brassica* sp.). Most of the annual, introduced species that comprise the majority of species and biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California's climate. These two factors, in addition to intensive grazing and agricultural practices in conjunction with severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasses with an annual- dominated, non-native grassland (Jackson 1985). These grasslands occur throughout San Diego County and serve as valuable raptor foraging habitat.

Broadleaf-dominated non-native grassland is a subtype of non-native grassland but is dominated greater than 50 percent by one or several invasive annual broadleaf species, such as: mustard, fennel (*Foeniculum vulgare*), or thistle (*Centaurea* spp.).

Non-native grasslands (including broadleaf-dominated) are abundant within the CCPU area and have been mapped along the central portion of San Clemente Canyon; other areas that are not mapped likely occur adjacent to undeveloped hillsides near and within San Clemente and Tecolote Canyons, and within undeveloped lands adjacent to roadways.

4.2.3 OTHER UPLANDS

Other uplands in this BRR consist of various vegetation communities/land cover types within the CCPU area that are typically a result from some level of disturbance (e.g., development, encroachment, or other anthropogenic disturbances). These habitats can also be considered sensitive if they support a sensitive species (i.e., a hawk in a eucalyptus tree).

4.2.3.1 Eucalyptus Woodland

Eucalyptus woodland is a community dominated by eucalyptus (*Eucalyptus* spp.), an introduced genus that has often been planted purposely for wind blocking, ornamental, and hardwood production purposes. Most groves are monotypic with the most common species being either the blue gum (*Eucalyptus gunnii*) or red gum (*E. camaldulensis* ssp. *obtusa*). The understory within well-established groves is usually very sparse due to the closed canopy and allelopathic nature of the abundant leaf and bark litter. If sufficient moisture is available, this species becomes naturalized and is able to reproduce and expand its range. The sparse understory offers only limited wildlife habitat; however, as a wildlife habitat, these woodlands can provide excellent nesting sites for a variety of raptors if the woodlands are not located in highly urbanized environments. During winter migrations, a large variety of warblers may be found feeding on the insects that are attracted to eucalyptus flowers.

Eucalyptus woodland is mapped in a few relatively small areas of the CCPU area; in the northeastern portion of Tecolote Canyon.

4.2.3.2 Disturbed Land

Disturbed land is defined by areas that have been physically altered such that native habitat vegetation or structure is no longer present, but the area may still retain some native species or native soil substrate. These areas are not typically artificially irrigated but may receive water from precipitation and urban runoff. Vegetation present is a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (Oberbauer et al. 2008).

Areas within the CCPU area mapped as disturbed land primarily occur in the northern portion of the CCPU area connected to natural habitat or in remnant ravines throughout the CCPU area.

4.2.3.3 Urban/Developed

Developed land consist of areas that have been constructed upon or physically altered to which native vegetation is no longer supported. Typically, developed lands contain structures, impervious surfaces, or landscaped areas that are irrigated (Oberbauer et al. 2008).

Within the CCPU area, developed land is the largest cover type occupying most of the total CCPU area.

4.3 SPECIAL-STATUS BIOLOGICAL RESOURCES

According to the SDMC (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (2018), sensitive biological resources refer to upland and/or wetland areas that meet any one of the following criteria:

- 1) Lands that have been included in the City's MSCP Preserve (i.e., the Multi-Habitat Planning Area [MHPA]);
- 2) Wetlands;
- 3) Lands that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;
- 4) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- 5) Lands containing habitats with MSCP Narrow Endemic species as listed in the City's Biology Guidelines (2018b); or
- 6) Lands containing habitats of MSCP Covered Species as listed in the City's Biology Guidelines (2018b).

Assessments for the potential occurrence of sensitive biological resources are based upon known ranges, habitat associations, and historical species occurrence records from the vicinity of the CCPA (as described in Section 3). No field vegetation mapping or focused sensitive species surveys were conducted as part of this BRR.

The following sections provide definitions for each of these sensitive biological resources and describe the sensitive biological resources that are known to occur or have a potential to occur within and/or adjacent to the CCPA.

4.3.1 SENSITIVE VEGETATION COMMUNITIES

Sensitive vegetation communities are vegetation assemblages, associations, or subassociations that have cumulative losses throughout the region, have relatively limited distribution, support or potentially support sensitive species, or have a particular value to other wildlife. Typically, sensitive vegetation communities are considered sensitive whether or not they have been disturbed. Within the CCPA, there are both sensitive upland vegetation communities and sensitive wetland communities.

The City's Biology Guidelines (2018b) divide upland vegetation communities into five tiers of sensitivity (the first being the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City 2018b). Tier I includes rare uplands; Tier II includes uncommon uplands; Tiers IIIA and IIIB include common uplands, and Tier IV includes other uplands. Tier I, II, IIIA, and IIIB are considered sensitive vegetation communities, while vegetation communities and land cover types classified as Tier IV are not considered sensitive.

Wetland communities are not assigned a tier under the City's Biology Guidelines, but they are considered sensitive under the City's Biology Guidelines (City 2018b). More specifically, City wetlands are defined in Chapter 11, Article 3, Division 1 of the SDMC and include areas characterized by the following conditions:

- 1) All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation;
- 2) Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities; and/or
- 3) Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology resulting from non-permitted filling of previously existing wetlands.

Additionally, typical non-sensitive habitats may be deemed sensitive if they support a sensitive species such as a burrowing owl or rare/endemic plant species.

Based on the definitions of "sensitive" and Table 3, above, the CCPU area supports 11 sensitive vegetation communities. All of the wetland communities (four habitat types) and seven of the 10 upland communities are considered sensitive including:

- Southern Riparian Forest
- Riparian Woodland
- Riparian Scrub
- Non-Native Riparian (disturbed riparian)
- Diegan Coastal Sage Scrub (including baccharis-dominated, coastal, and disturbed forms)
- Maritime Succulent Scrub
- Chaparral
- Scrub Oak Chaparral
- Southern Maritime Chaparral
- Native Grassland
- Non-Native Grassland

4.3.2 SPECIAL-STATUS PLANTS

Special-status plant species are those that are federal, State, or CNPS rare, threatened, or endangered; MSCP Covered Species; MSCP Narrow Endemic (NE) species; or California Rare Plant Rank (CRPR) ranked list 1 and 2 species (Appendix A). In this document, CRPR ranked 3 and 4 species, which are not highly imperiled, are also included here for full public disclosure and knowledge. In the future, some of these species may be elevated in status, so inclusion here is warranted as a programmatic document. Special status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is

geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread but exists naturally in small populations.

Per the sources listed above, a total of 26 sensitive plant species have been historically identified within or immediately adjacent to the CCPA (Table 4). Although most known occurrences are within MSCP Baseline Conserved Areas in San Clemente or Tecolote canyons, other areas in the CCPU area may support them. Of the species that have been reported in the community plan area, eight are MSCP covered species. Note that these species have special conditions of coverage under the MSCP. Most conditions relate to long-term species and habitat management but occasionally include development restrictions. For a full list of MSCP conditions of coverage please see Appendix B.

A search of CNPS and CNDDDB records (nine USGS 7.5-minute quadrangle search) was used to develop a matrix of additional sensitive plant species (28 total) that may have potential to occur in the CCPU area due to the presence of suitable habitat (e.g., vegetation communities, soils, elevation, and geographic range, life form/blooming period, etc.). The matrix is presented in Table 4.

Table 4. Special-Status Plant Species and Potential to Occur in the Clairemont Community Plan Update Area

Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
San Diego thorn-mint (<i>Acanthomintha ilicifolia</i>)	FT SE CNPS 1B.1 MSCP Covered; NE	Low Potential. Occurs between 10 and 960 meters AMSL on clay soils in chaparral, coastal sage scrub, valley and foothill grassland, and vernal pools. CNDDDB has two records of this species within two miles of the CCPU area; however, these records are historical (1936) and this species is presumed to be extirpated from the majority of this portion of the County as a result of development. Suitable habitat present, but species is likely extirpated within the CCPU area.	Annual herb April to June
Nuttall's acmispon (<i>Acmispon prostratus</i>)	-- -- CNPS 1B.1 --	Low Potential. Found in coastal dunes and sandy coastal scrub habitat between 0 and 10 meters AMSL. The nearest occurrence is in the Mission Bay area (CNDDDB, 2025). Species is not likely to be present within the CCPU area based on lack of dune or sandy habitats.	Annual herb March to June (July)
California adolphia (<i>Adolphia californica</i>)	-- -- CNPS 2B.1 --	High Potential. Found in clay soils in chaparral, coastal scrub, and valley and foothill grassland vegetation between 10 and 740 meters AMSL. CNDDDB has several populations known to occur near the CCPU area along I-8 freeway to the east of the CCPU area and California consortium of herbaria shows one occurrence just north of the CCPU area. Suitable habitat is present in the CCPU area.	Perennial, deciduous shrub December to May
San Diego sagewort (<i>Artemisia palmeri</i>)	-- -- CNPS 4.2 --	Present. Found in chaparral, coastal scrub, riparian forest, riparian scrub, and riparian woodland habitats at elevations between 15 and 915-meter AMSL. California consortium of herbaria lists three occurrences within Tecolote Canyon.	Perennial deciduous shrub (February)May- September.

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Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
Coulter's saltbush (<i>Atriplex coulteri</i>)	-- -- CNPS 1B.2 --	Not Expected. Occurs between 3 and 460 meters AMSL in areas of alkaline or clay soils within coastal bluff scrub, coastal dunes, coastal scrub, and native grasslands. CNDDB has one extant population known to occur south of the CCPU area in an undeveloped urban canyon in the Serra Mesa Community Planning Area. Suitable habitat is present in the CCPU area.	Perennial herb March to October
South coast saltscale (<i>Atriplex pacifica</i>)	-- -- CNPS 1B.2 --	Present. Occurs between 0 to 140 AMSL in coastal bluff scrub, coastal dunes, coastal scrub, and playa habitat. Records exist from Tecolote Canyon and suitable habitat is present in other areas of the CCPU.	Annual herb March to October
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	-- -- CNPS 1B.1 MSCP Covered	Present. Occurs in clay soils in chaparral, coastal scrub, valley and foothill grassland, and vernal pool habitat at elevations of 50 to 465 meters AMSL. Observed in Tecolote Canyon and may occur in other areas of the CCPU.	Perennial bulbiferous herb April to May
Orcutt's brodiaea (<i>Brodiaea orcuttii</i>)	-- -- CNPS 1B.1 MSCP Covered	Present. Occurs in closed-cone coniferous forest, chaparral, cismontane woodland, meadows and seeps, valley and foothill grassland, and vernal pools at elevations of 30 to 1692 meters AMSL in areas with mesic, clay soils. California consortium of herbaria lists seven records within or near the CCPU.	Perennial bulbiferous herb May to July
Otay Mountain ceanothus (<i>Ceanothus otayensis</i>)	-- -- CNPS 1B.2 --	Not Expected. Occurs between 600 and 1100 meters AMSL in areas of metavolcanic or gabbroic soils where chaparral vegetation. CNDDB has one extant population known to occur north of the CCPU area within the MCAS Miramar. Suitable habitat does not occur in the CCPU area.	Perennial shrub January to April

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Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
Wart-stemmed ceanothus (<i>Ceanothus verrucosus</i>)	-- -- CNPS 2B.2 MSCP Covered	Present. Occurs between 1 and 380 meters AMSL in chaparral habitat. There are two occurrences within the California consortium of herbaria within Tecolote Canyon near Mt. Alifan Drive. Suitable habitat occurs in other portions of the CCPU as well.	Perennial evergreen shrub December to May
Seaside calandrinia (<i>Cistanthe maritima</i>)	-- -- CNPS 4.2 --	Present. Occurs in sandy soils in coastal bluff scrub, coastal scrub, and valley and foothill grassland habitat at elevations of 5 to 300 meters AMSL. Observed in Tecolote Canyon and may occur in other areas of the CCPU.	Annual herb (February) March to June (August)
Palmer's goldenbush (<i>Ericameria palmeri</i> var. <i>palmeri</i>)	-- -- CNPS 1B.1 MSCP Covered	Moderate Potential. Occurs between 300 and 600 meters AMSL in mesic soils and associated with chaparral and coastal scrub vegetation. CNDDDB has one extant population known to occur south of the CCPU area along I-8 freeway. Suitable habitat is present in the CCPU area.	Perennial shrub July to November
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	-- -- CNPS 2B.1 MSCP Covered	Present. Occurs between 3-450 meters AMSL in chaparral, coastal scrub, valley and foothill grassland, and vernal pool habitat and has been observed in Tecolote Canyon (cited in the Marian Bear Memorial Park Natural Resource Management Plan) and could occur in other locations in the CCPU area.	Perennial stem succulent May to June
Palmer's grapplinghook (<i>Harpagonella palmeri</i>)	-- -- CNPS 4.2 --	Present. Occurs between 20-955 meters AMSL in clay soils that support chaparral, coastal scrub vegetation, and native grasslands. Found in openings within the vegetation. One occurrence listed in the California consortium of herbaria north of end of Mount Ashmun Drive, east of Tecolote Creek. Suitable habitat is present in the CCPU area.	Annual shrub March to May

Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
Decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	-- -- CNPS 1B.2 --	Present. Occurs in chaparral and coastal scrub habitat with sandy soils, often in disturbed areas at elevations of 10-135 meters AMSL. One occurrence near Linda Vista Road just outside of the CCPU area and one occurrence near the southwest corner of Highway 52 and I-805. Similar habitat occurs in other parts of the CCPU area.	Perennial shrub April to November
San Diego marsh-elder (<i>Iva hayesiana</i>)	-- -- CNPS 2B.2 --	Moderate Potential. Found in marshes, swamps, plays, and often associated with drainage channels. Found between 10 and 500 meters AMSL in openings within the vegetation. CNDDDB has one extant population known to occur within two miles of the CCPU area; located north within Rose Canyon the communities of University and Clairemont. Suitable wetland habitat and drainages that could support this species occur in the CCPU area.	Perennial herb April to October
Southwestern spiny rush (<i>Juncus acutus</i> ssp. <i>leopoldii</i>)	-- -- CNPS 4.2 --	Present. Occurs in coastal mesic dunes, alkaline meadows and seeps, and coastal salt marshes and swamps between 3 and 900 meters AMSL. One occurrence in Tecolote Canyon south of SW end of Mount Ashmun Drive, in Tecolote Creek from 2008. Suitable habitat that could support the species occurs in the CCPU area.	Perennial rhizomatous herb (March)May-June
Robinson's pepper-grass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)	-- -- CNPS 4.3 --	Moderate Potential. Occurs in chaparral and coastal scrub vegetation. CNDDDB has two extant populations known to occur within Rose Canyon. Suitable habitat is present in the CCPU area.	Annual herb January to July
Sea dahlia (<i>Leptosyne maritima</i>)	-- -- CNPS 2B.2 --	Present. Occurs in coastal bluff scrub and coastal scrub at elevations of 5 to 150 meters AMSL. Occurrences within Tecolote Canyon. Suitable habitat exists in other portions of the CCPU area.	Perennial herb March to May

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Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
California box-thorn (<i>Lycium californicum</i>)	-- -- CNPS 4.2 --	Present. Occurs in coastal bluff scrub and coastal scrub habitat at elevations from 5 to 150 meters AMSL. California consortium of herbaria lists an occurrence from 2013 within San Clemente Canyon S of SR-52 freeway and slope NE ca. 0.25 miles from intersection of Monongahela St. and Wyandotte Ave. Similar habitat occurs within other areas of the CCPU.	Perennial shrub (December) Marsh, June, July, August
Small-flowered microseris (<i>Microseris douglasii</i> ssp. <i>platycarpa</i>)	-- -- CNPS 4.2 --	Present. Occurs in cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pool habitat with clay soils at elevations of 15 to 1070 meters AMSL. Known from California Consortium of Herbaria records at the NE intersection of I 805 and Clairemont Mesa Blvd. Similar habitat occurs in other areas of the CCPU.	Annual herb March to May
Willowy monardella (<i>Monardella viminea</i>)	FE SE CNPS 1B.1 MSCP Covered	High Potential. Occurs in chaparral, coastal scrub, riparian forest, riparian scrub, and riparian woodland habitat within alluvial, ephemeral washes at elevations of 50 to 225 meters AMSL. Species has been reported historically (via CNDDDB) in San Clemente Canyon between Genesee and Regent; however current population status is unknown.	Perennial herb June to August
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE SE CNPS 1B.1 MSCP Covered; NE	Present. Occurs in vernal pool habitat at elevations of 90 to 200 AMSL. Known populations near the NE intersection of I 805 and Clairemont Mesa Blvd (per CNDDDB). Other populations may occur within the CCPU.	Annual herb March to June
Nuttall's scrub oak (<i>Quercus dumosa</i>)	-- -- CNPS 1B.1 --	Present. Found in closed-cone coniferous forest, chaparral, and coastal scrub habitat between 15 and 400 meters AMSL. California consortium of herbaria lists two occurrences near or in Tecolote Canyon, the most recent CNDDDB report was in 2008 north of Holmes Elementary School on Mount Ararat Drive, west of Mount Brundage Avenue, west-facing slope. Suitable habitat exists in other areas of the CCPU.	Perennial evergreen shrub February-April (August)

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Species	Sensitivity ² Federal State CNPS City	Habitat(s)/Range and Potential to Occur	Lifeform ³ and Bloom Period
Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	-- -- CNPS 1B.2 --	Present. Found in chaparral and cismontane woodland habitat at elevations of 30 to 350 AMSL. Known from the San Clemente Canyon near foot of north slope, just west of Genesee Ave. California consortium of herbaria lists two records near this location. Similar habitat occurs in other areas of the CCPU.	Perennial evergreen shrub February to April
Munz's sage (<i>Salvia munzii</i>)	-- -- CNPS 2B.2 --	Moderate Potential. Occurs in chaparral and coastal scrub vegetation between 115 and 1,065 meters AMSL. CNDDDB has one record of this species within two miles of the CCPU area, located with Ruffin Canyon in the Serra Mesa Community Planning Area. Suitable habitats are present in the CCPU area.	Perennial shrub February to April
Ashy spike-moss (<i>Selaginella cinerascens</i>)	-- -- CNPS 4.1 --	Present. Occurs in chaparral and coastal scrub habitat at elevations of 20-640 meters AMSL. Documented within the San Clemente Canyon and included as part of the Marian Bear Memorial Park Natural Resource Management Plan. Suitable habitat occurs in other areas of the CCPU as well.	Perennial rhizomatous herb NA
San Diego County viguiera (<i>Viguiera laciniata</i>)	-- -- CNPS 4.2 --	High Potential. Found in chaparral and coastal scrub in a variety of soil types at elevations of between 60 to 750 meters AMSL. Per CNDDDB records, this species was observed in 2018 adjacent to the CCPU area, located east of I-15 and along Clairemont Mesa Boulevard. Suitable habitat is present in the CCPU area.	Perennial shrub February to August
¹ Sensitive includes MSCP Narrow Endemic and Covered Species ² See Appendix A for an explanation of sensitivity codes ³ Lifeform and bloom period are from CNPS (2025)			

4.3.3 SPECIAL-STATUS WILDLIFE

Special-status animal species are those that are considered federal or state threatened or endangered; or MSCP Covered Species (Appendix A). A species may also be considered special-status if it is included on the CDFW's Special Animals List (CDFW 2025e) as a candidate for federal or state listing; is on California Species of Special Concern, Watch List Species, or Fully Protected species; or is a federal Bird of Conservation Concern (Appendix A). Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Additionally, avian nesting is protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code.

A total of 19 sensitive wildlife species have been historically recorded within or adjacent to the CCPU area (Table 5). Although a single southwestern willow flycatcher was recorded during general biological field surveys for the City's Pure Water Final EIR (City 2018a), this species is not expected to breed within the CCPU area due to lack of suitable habitat.

Of the species that have been reported in the CCPU area, ten are MSCP covered species. Note that these species have special conditions of coverage under the MSCP. Most conditions relate to long-term species and habitat management but occasionally include development restrictions. For a full list of MSCP conditions of coverage please see Appendix B.

Table 5. Sensitive Wildlife Species and Potential to Occur in the Clairemont Community Plan Update Area

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
Amphibians		
Western spadefoot (<i>Spea hammondi</i>)	FTP SSC --	Moderate Potential. Inhabits floodplains, washes, and low hills. In southern California, its habitats include coastal sage scrub, chaparral, and grassland. Important habitat components include temporary pools (which form during winter and spring rains) for breeding and friable soils for burrowing. CNDDB records one 1958 occurrence of this species within two miles of the CCPA, within an SDG&E utility easement northwest of Snapdragon Stadium in the Mission Valley Community Planning Area. Suitable habitat is present in the wetland and portions of the CCPA.
Reptiles		
Southern California legless lizard (<i>Anniella pulchra</i>)	-- SSC --	Low Potential. Occurs in coastal dune, valley foothill grassland, chaparral, and coastal scrub habitats. CNDDB shows occurrences of this species from 1938 near Morena Boulevard in areas that have since been developed. The species is considered to be extirpated from the area, although suitable habitat may occur within the CCPA.
Orange-throated whiptail (<i>Aspidoscelis hyperythra</i>)	-- WL MSCP Covered	Present. Occurs primarily on coarse soils in open coastal sage scrub vegetation. Occurs along the edge of open, dry, riparian areas, along trails, along dirt roads, and in areas of light off-road vehicle use. CNDDB records an occurrence of this species from 1969 in Tecolote Canyon. Suitable habitat is present in other areas of the CCPA.
California glossy snake (<i>Arizona elegans occidentalis</i>)	-- SSC --	Present. Occurs primarily in desert habitat types, including chaparral, sagebrush, valley-foothill hardwood, pine-juniper, and annual grass. There are presumed extant CNDDB records of the species from 1946 in Tecolote Canyon. Suitable habitat is also present in other areas of the CCPA.

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
Red diamond rattlesnake (<i>Crotalus ruber</i>)	-- SSC --	Present. Occurs in desert scrub, thorn scrub, open chaparral, mesquite/cactus, and pine-oak woodland, sometimes also dunes, grassland, and cultivated areas between rock outcrops. It is most common in heavy brush where rocks and rocky outcrops are prevalent. SanBIOS records this species in suitable habitat near Stevenson Canyon in 1959. Suitable habitat is present throughout portions of the CCPA.
Coast horned lizard (<i>Phrynosoma coronatum blainvillii</i>)	-- SSC MSCP Covered	Present. Occurs in areas with native ants and few or no Argentine ants, in areas with native chaparral vegetation, and in sites with porous soils relatively free of organic debris. SanBIOS and CNDDDB record a species occurrence from 1972 near Morena Boulevard in the southwestern portion of the CCPA. Suitable habitat is present in portions of the CCPA.
Coronado skink (<i>Plestiodon skiltonianus interparietalis</i>)	-- SSC --	Moderate. Found in grasslands, coastal sage scrub, open chaparral, pine oak woodland, and coniferous forests. It prefers areas where there is abundant leaf litter or low, herbaceous growth. Suitable habitat for this species is present in grasslands and coastal sage scrub within the CCPA.
Two-striped garter snake (<i>Thamnophis hammondi</i>)	-- SSC --	Moderate Potential. Occurs primarily along permanent creeks and streams but also around vernal pools and along intermittent streams. It is occasionally found in chaparral or other habitats relatively far from permanent water. Suitable intermittent aquatic habitat likely exists within the CCPU area; however, this species prefers permanent aquatic habitats, which are limited within the CCPU area.
Birds		
Cooper's hawk (<i>Accipiter cooperii</i>)	-- SSC MSCP Covered	Present. Occurs in mature forest, open woodlands, wood edges, river groves. Nests in coniferous, deciduous, and mixed woods, typically those with tall trees and with openings or edge habitat nearby. Also found among trees along rivers through open country, and increasingly in suburbs and cities where some tall trees exist for nest sites. Observed within San Clemente Canyon and referenced in the Marian Bear Memorial Park Natural Resource Management Plan. Suitable habitat is present in the CCPU area.

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	-- WL MSCP Covered	Present. Occurs in coastal sage scrub and chaparral habitats of moderate density throughout the County. Observed within San Clemente Canyon and referenced in the Marian Bear Memorial Park Natural Resource Management Plan. Suitable habitat is present in the CCPU area.
Burrowing owl (<i>Athene cunicularia</i>)	-- SCE; SSC MSCP Covered	Moderate. Occurs in grasslands, rangelands, agricultural areas, deserts, or any other open dry area with low vegetation and rodent burrows or cavities. CNDDB observations occur within grassland habitat near Mission Bay (e.g., throughout Fiesta Island and along San Diego River), and multiple eBird observations have been reported in these areas as recently as February 2025. No nesting has been documented but individual bird/s are regularly observed. Suitable habitat is present in the CCPU area.
Northern harrier (<i>Circus cyaneus</i>)	-- SSC MSCP Covered	Present. Occurs in marshes, fields, prairies. Found in many kinds of open terrain, both wet and dry habitats, where there is good ground cover. Observed within Tecolote Canyon and San Clemente Canyon and referenced in the Marian Bear Memorial Park Natural Resource Management Plan. Suitable habitat is present in the CCPA.
White-tailed kite (<i>Elanus leucurus</i>)	-- Protected --	Present. Occurs in low bushes and open grassland habitat. Observed within San Clemente Canyon and referenced in the Marian Bear Memorial Park Natural Resource Management Plan. Suitable habitat is present in the CCPA.
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE SE MSCP Covered	Low-Moderate (Documented Historically). Occurs in deciduous thickets, especially willows and often near water. Observed within Tecolote Canyon historically. Suitable foraging habitat is present ; however, nesting habitat is marginal within the CCPA and breeding is not expected.
Prairie falcon (<i>Falco mexicanus</i>)	-- WL --	Present. Occurs in open hills, plains, prairies, deserts. Typically found in fairly dry open country, including grassland and desert. Observed within Tecolote Canyon. Suitable habitat is present in the CCPA.

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
American peregrine falcon (<i>Falco peregrinus anatum</i>)	-- -- MSCP Covered	Present. Occurs in highly variable habitat types; often documented as showing little preference for specific ecological communities. Prefers cliffs and tall, manufactured structures surrounded by open landscapes with nearby riparian areas. Observed within Tecolote Canyon. Suitable habitat is present in the CCPA.
Yellow-breasted chat (<i>Icteria virens</i>)	-- SSC --	High Potential. In California, this species is found in a variety of dense riparian thickets during its breeding season and is mostly absent during the winter months. Observations of this species were recorded in 2018 adjacent to the CCPA, located north within the MCAS Miramar. Suitable habitat for this species is present in the CCPA and the species may move through the CCPA during migration; however, larger habitat blocks occur outside of the CCPA and are more likely to be inhabited and used for breeding by this species. Suitable habitat is present in the CCPA.
Loggerhead shrike (<i>Lanius ludovicianus</i>)	-- SSC --	Present. Occurs in semi-open country with lookout posts; wires, trees, scrub. Breeds in any kind of semi-open terrain, from large clearings in wooded regions to open grassland or desert with a few scattered trees or large shrubs. Observed within Tecolote Canyon. Suitable habitat is present in the CCPA in other areas, as well.
Coastal California gnatcatcher (<i>Poliophtila californica californica</i>)	FT SSC MSCP Covered	Present. Occurs in or near coastal scrub vegetation communities dominated by sage. Density of gnatcatchers is highest in high-quality habitat and decreases as habitat quality decreases. CNDDDB records from Tecolote Canyon, Stevenson Canyon, and San Clemente Canyon. Suitable habitat is present in the CCPA.
Yellow warbler (<i>Setophaga petechia</i>)	BCC SSC --	Present. Occurs in woods and thickets along edges of streams, lakes, swamps, and marshes, favoring willows, alders, and other moisture-loving plants. Observed within San Clemente Canyon and referenced in the Marian Bear Memorial Park Natural Resource Management Plan and observed within Tecolote Canyon. Suitable habitat is present in the CCPA.

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE SE MSCP Covered	Moderate Potential. Least Bell's vireo is found a variety of riparian scrub, woodland, and forest habitats in California and northern Baja California, Mexico during its breeding season. It winters in southern Baja California, Mexico. CNDDDB has several records of this species occurring within two miles of the CCPA. These records are south of the CCPA within the riparian corridor of the San Diego River in the Mission Valley Community Planning Area. Suitable habitat for this species is present in the CCPA and the species may move through the area during migration; however, larger habitat blocks occur outside of the CCPA and are more likely to be inhabited and used for breeding by this species.
Invertebrates		
Crotch's bumble bee (<i>Bombus crotchii</i>)	-- SCE --	Moderate potential. Occurs across a variety of arid shrublands and grasslands in coastal and foothill areas of southern California. Nectar plants include milkweeds, buckwheats, and lupines, amongst other angiosperms with medium-length floral tubes. Suitable habitat types and nectar sources for this species are present throughout the CCPA.
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE -- --	Low. Occurs in grasslands, coastal sage scrub, chamise chaparral, red shank chaparral, juniper woodland, and semi-desert scrub that support native species of plantain, the butterfly's primary larval host plant. One CNDDDB species record from 2005 is approximately three miles east of the CCPA.
Mammals		
Northwestern San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>)	-- SSC --	Low Potential. Occurs in coastal sage scrub, grasslands, and sparse chaparral, usually with loams and sandy substrates. CNDDDB has one 1994 record of this species occurring east in the Tierrasanta Community Planning Area. Suitable habitat is present in the CCPU area.
Pacific pocket mouse (<i>Perognathus longimembris pacificus</i>)	FE	Not Expected. The Pacific pocket mouse has occurred on fine-grain, sandy substrates in open coastal sage scrub, coastal strand, coastal dune, and river alluvium habitats. The extant populations at the three known locales occur within open coastal sage scrub habitats. While similar habitat types occur within the CCPU, known populations are not near the site.

Species	Sensitivity ² Federal State City	Habitat(s) and Potential to Occur
Western mastiff bat (<i>Eumops perotis californicus</i>)	-- SSC --	Moderate Potential. Found in chaparral where associated with oak trees. Also prefers cracks and small holes within rocky areas and manufactured structures. CNDDDB has an observation record of this species from 1995 occurring less than three miles from the CCPA, located southwest of Aztec Stadium. Limited suitable chaparral habitat is present in the CCPA.
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	-- SSC --	Moderate Potential. Occurs in desert areas with high cliffs and/or rock outcrops. CNDDDB has two records of this species documented within the CCPU and two miles from the CCPU area in the adjacent Linda Vista Community Planning Area; however, these records are from 1983 and 1987 and are of deceased individuals that were reported to the County Public Health Department.
Big free-tailed bat (<i>Nyctinomops macrotis</i>)	-- SSC --	Moderate Potential. Found in rocky rugged areas with canyons and/or cliffs. CNDDDB has one record of this species documented within the CCPA; however, this record is from 1983 and 1987 and are of deceased individuals that were reported to the County Public Health Department.
¹ Sensitive includes MSCP Narrow Endemic and Covered Species ² See Appendix A for an explanation of sensitivity codes		

4.3.4 U.S. FISH AND WILDLIFE SERVICE CRITICAL HABITAT

Critical habitat is defined as areas of land that are considered necessary for endangered or threatened species to recover. There is no critical habitat within the CCPU area.

4.4 POTENTIALLY JURISDICTIONAL AQUATIC RESOURCES

Agencies with jurisdictional authority over aquatic resources include the U.S. Army Corps of Engineers (Corps), CDFW, Regional Water Quality Control Board (RWQCB), and the City. In addition, the USFWS may take jurisdiction for areas supporting endangered or sensitive species via consultation with the Corps (i.e., for fairy shrimp in roadway depressions). In general, jurisdictional aquatic resources are grouped into three primary categories: wetlands, non-wetland waters, and associated aquatic vegetation. A formal aquatic resource delineation was not conducted as part of this BRR. Individual assessments of wetland and waters resources within the CCPU area should be conducted at a project-level for all future proposed development projects that potentially jurisdictional aquatic resources on or adjacent to the project area. Furthermore, a formal aquatic resources delineation may be required to identify such jurisdictional features and the corresponding boundary extents of identified jurisdictional areas, and to determine if proposed project impacts

would occur. Potentially jurisdictional aquatic resources and features within the CCPU area are described below.

Vegetation communities in the CCPU area that may also be jurisdictional aquatic resources include southern riparian forest, riparian woodland, riparian scrub, and non-native riparian. In addition to the vegetation mapping, the USFWS National Wetlands Inventory (NWI; 2025a) database shows riverine and freshwater areas within the CCPU area; specifically, PEM1A: palustrine, emergent, persistent, temporary flooded; PFO/SSA: palustrine, forested, scrub-shrub, temporary flooded; PFO/SSC: palustrine, forested, scrub-shrub, seasonally flooded; and PSSA: palustrine, scrub-shrub, temporary flooded. There are very few mapped areas within the CCPU in the NWI database; however, many areas are not mapped.

Riverine areas recorded in the NWI database occur as tributaries associated with either San Clemente Canyon along the northern portion of the CCPU area or Tecolote Canyon running north-south through the center of the CCPU area and Stevenson Canyon west of Tecolote Canyon; (see Figure 4). Due to contiguity of linear stream features, most of these reach areas may be considered jurisdictional wetlands and/or waters.

4.4.1 U.S. ARMY CORPS OF ENGINEERS JURISDICTION

USACE regulates the discharge of dredged and/or fill material, both temporary and permanent, into Wetland and Non-Wetland WoUS, pursuant to Section 404 of the CWA. USACE Non-Wetland WoUS are delineated by the lateral and upstream/downstream extent of the ordinary high-water mark. USACE Wetland WoUS are areas that support wetland hydrology, hydric soils, and hydrophytic vegetation. Swales and erosional features (e.g., gullies; small washes characterized by low volume, infrequent, and short duration flow) are generally not considered WoUS because they are not tributaries or they do not have a significant nexus to downstream TNWs.

4.4.2 REGIONAL WATER QUALITY CONTROL BOARD JURISDICTION

The RWQCB is a regional agency responsible for protecting water quality in California. The RWQCB asserts regulatory jurisdiction over activities affecting wetland and non-wetland Waters of the State (State Water Resources Control Board 2019) pursuant to Section 401 of the Clean Water Act and the State Porter-Cologne Water Quality Control Act. The RWQCB requires a delineation of resources to document wetland and non-wetland Waters of the State. The RWQCB issues a Clean Water Act Section 401 Water Quality Certification for projects that affect Waters of the State and requires a Report of Waste Discharge for projects that affect water quality of isolated Waters of the State under Porter-Cologne.

4.4.3 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE JURISDICTION

Under sections 1600 et. seq. of California Fish and Game Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife and requires a Streambed Alteration Agreement for such activities. The CDFW issues a Streambed Alteration Agreement with any necessary mitigation to ensure protection of the State's fish and wildlife resources. The CDFW has jurisdiction

over riparian habitats associated with watercourses. The CDFW jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider.

4.4.4 LOCAL

City of San Diego

According to SDMC (Chapter 11, Article 3, Division 1), areas that are characterized by any of the following conditions are considered wetlands.

- 1) All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
- 2) Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation, or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
- 3) Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands; and/or
- 4) Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

Within the CCPU area, the habitats considered to be City wetlands are presented in Table 3 and Figure 5, and include southern riparian forest, riparian woodland, riparian scrub, and non-native riparian.

4.5 WILDLIFE MOVEMENT CORRIDORS

Wildlife corridors are linear spaces of undeveloped native habitats that connect large natural open space and provide opportunities for wildlife movement either at a regional or local scale. Habitat linkages between wildlife corridors connect isolated blocks of habitat and allow movement or dispersal species over a large scale and the consequent mixing of genes between populations (i.e., gene pool diversity). Wildlife corridors and habitat linkages contribute to species' sustainability by providing access to adjacent habitat areas for dispersal, foraging, and mating. Wildlife movement corridors and linkages are considered sensitive by the City, resource agencies, and conservation groups.

A regional wildlife corridor exists along the northern boundary within San Clemente Canyon, which is identified by the MSCP as a 'biological core area' and a 'biological linkage' (Figure 3)(County of San Diego, 1997). This corridor extends east through San Clemente Canyon then transitions north continuing through MCAS Miramar.

Other undeveloped areas in the CCPA, including Tecolote Canyon and other urban canyons are limited in connectivity due to surrounding existing development, including major freeways, but serve as stepping stones and local links within and between the remaining habitat in the CCPU area and

nearby areas (i.e., Mission Bay and San Diego River Park open space areas to the south; Mission Trails Regional Park connections to the east, MCAS Miramar and Los Peñasquitos Canyon Preserve and San Diego National Wildlife Refuge to the north (Figure 6)).

The CCPU area is likely to support urban adapted and migrating terrestrial wildlife species (i.e., birds, mammals, reptiles and amphibians, etc.), including the coyote (*Canis latrans*), and bobcat (*Lynx rufus*), mule deer (*Odocoileus hemionus*), and mountain lion (*Felis concolor*).

5 MSCP Subarea Plan Consistency Analysis

This section provides information to inform the MSCP Subarea Plan consistency analysis for future projects within the CCPA and for the CCPU itself through compliance with applicable portions of the MSCP Subarea Plan, including the General Planning Policies and Design Guidelines (Section 1.4.2 of the MSCP Subarea Plan); Land Use Adjacency Guidelines (Section 1.4.3 of the MSCP Subarea Plan); General Management Goals and Objectives (Section 1.5.1 of the MSCP Subarea Plan); General Management Directives (Section 1.5.2 of the MSCP Subarea Plan); Specific Management Policies and Directives for Urban Habitat Lands (Section 1.5.7 of the MSCP Subarea Plan); and Specific Management Policies and Directives for the Northern Area (Section 1.5.7 of the MSCP Subarea Plan). For a description of each applicable MSCP policy, please refer to Section 2 of this document.

When a biological resources report is required for a future site-specific project within the CCPA, the report shall include an MSCP Consistency Analysis that documents compliance with applicable sections of the MSCP Subarea Plan that pertain to biological resources within the CCPA and the specific project area. All future projects shall be planned and executed in conformance with the City's ESL Regulations, Biology Guidelines, MSCP Subarea Plan, and VPHCP.

5.1 MHPA BOUNDARY LINE CORRECTION

A targeted MHPA BLC is proposed as part of the CCPU to correct preserve boundaries and include city-owned and managed Tecolote Canyon open space lands in the MHPA. The proposed MHPA BLC is consistent with the goals of the MSCP Subarea Plan to conserve biological resources and to exclude legally developed and required uses (i.e., structures, streets, Brush Management Zone 1). The MHPA BLC would result in an addition of 78.7 acres to the MHPA (Figure 6). Of the 78.7 acres, the majority is Diegan coastal sage scrub habitat (38.9 acres) and southern riparian forest (15.5 acres), with smaller areas of maritime succulent scrub (3.6 acres), non-native grassland (2.6 acres), scrub oak chaparral (3.4 acre), and disturbed land 14.7 acre). Thus, with approval of the CCPU BLC, considerable native habitat would be added to the MHPA preserve. No substructions from the MHPA are proposed.

The original MHPA boundary within the CCPA was established as part of the regional MSCP mapping efforts, which became effective in March 1997. MHPA BLCs are allowed under the MSCP Subarea Plan to rectify minor mapping inaccuracies at the project level, and can be processed with the project's discretionary or ministerial review. Preservation of sensitive habitat is consistent with the goals of the MSCP, the Conservation Element for the CCPU, and the City's ESL regulations. A majority of the BLCs remove developed and disturbed land while adding sensitive habitats. City-

owned lands within designated CCPA open space adjacent to the existing MHPA have also been added to the MHPA. In a few cases, sensitive habitat located within designated CCPA open space on private land was added to the MHPA to expand a local wildlife corridor and increase the viability and connectivity of sensitive habitat within the existing MHPA. Regardless of the MHPA BLC location, these additional areas are regulated for sensitive biological resources and steep slopes through the ESL Regulations. The MHPA BLC does not create additional regulations associated with City projects, such as sewer line repairs within the canyons. These projects would continue to be conducted in accordance with the Canyon Sewer Cleaning Program (LDR No. 6020), Council Policies 400-13 and 400-14, and Clairemont Community Plan policies related to this program. The MHPA BLCs also do not relieve projects from having to otherwise comply with the City's MHPA Land Use Adjacency Guidelines, described below. The MHPA BLCs result in an overall benefit to the MHPA and is consistent with the goals and policies of the MSCP and the CCPU.

5.2 GENERAL PLANNING POLICIES AND DESIGN GUIDELINES

Section 1.4.2 of the MSCP Subarea Plan provides general planning and design guidelines for development projects as they relate to the MHPA and provides recommendations for projects within or adjacent to the MHPA. The guidelines relate to construction and maintenance of roads and utilities; fencing, lighting, and signage; material storage, mining, extraction, and processing facilities, and flood control. The language from the MSCP Subarea Plan is provided above in Section 2. This section presents the consistency analysis for future projects within the CCPA and for the CCPU itself.

5.2.1 ROADS AND UTILITIES – CONSTRUCTION AND MAINTENANCE POLICIES

Projects within the CCPA that are within or adjacent to the MHPA would be analyzed on a project-by-project basis to ensure compliance with the construction and maintenance policies for roads and utilities, as outlined above. Note that if road widening or utilities are proposed within or adjacent to the MHPA, the policies above would apply, and MSCP consistency would be assessed on a project-by-project basis. Through implementation of these policies, future development would be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning and would not alter MSCP consistency requirements for subsequent projects, is consistent with the MSCP Subarea Plan roads and utilities construction and maintenance requirements.

5.2.2 FENCING, LIGHTING, AND SIGNAGE

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the fencing, lighting, and signage policies, as outlined in Section 1.4.2 of the MSCP Subarea Plan. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan fencing, lighting, and signage requirements.

5.2.3 MATERIALS STORAGE

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the materials storage policies, as outlined above. Through implementation of these policies, these

projects will be consistent with the MSCP Subarea Plan. By requiring subsequent projects to include an MSCP consistency analysis in the biological resources report, the CCPU itself, as a programmatic document that guides project analyses, is consistent with the MSCP Subarea Plan materials storage requirements.

5.2.4 MINING, EXTRACTION, AND PROCESSING FACILITIES

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with policies that apply to mining, extraction, and processing facilities, as outlined in Section 1.4.2 of the MSCP Subarea Plan. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. By requiring projects to include an MSCP consistency analysis in the biological resources report, the CCPU itself, as a programmatic document that guides project analyses, is consistent with the MSCP Subarea Plan mining and extraction policies.

5.2.5 FLOOD CONTROL

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the flood control policies, as outlined in Section 1.4.2 of the MSCP Subarea Plan. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. By requiring projects to include an MSCP consistency analysis in the biological resources report, the CCPU itself, as a programmatic document that guides project analyses, is consistent with the MSCP Subarea Plan flood control requirements.

5.3 LAND USE ADJACENCY GUIDELINES

Section 1.4.3 of the MSCP Subarea Plan provides guidelines that apply to projects adjacent to the MHPA. An MSCP consistency analysis for the CCPU and subsequent projects within the CCPA is provided below. For a listing of the MSCP adjacency guideline requirements, please refer to Section 2.3.2.2.

5.3.1 DRAINAGE

Future site-specific projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the following:

- Drainage guidelines to ensure that new development does not drain directly into the MHPA;
- Toxics guidelines to ensure that potentially toxic chemicals are not released into the MHPA;
- Lighting guidelines to ensure lighting adjacent to the MHPA is directed away from the MHPA or shielded to protect the MHPA and sensitive species from unnatural night lighting;
- Noise guidelines to avoid and minimize noise impacts on wildlife that utilize the MHPA;
- Barrier guidelines to ensure new development adjacent to the MHPA provides barriers to direct public access to appropriate locations and reduce domestic animal predation;
- Invasive species guidelines to ensure that no invasive, non-native plant species are introduced into the MHPA;

- Brush management guidelines to ensure that appropriate setbacks and safety measures are in place for residential projects adjacent to the MHPA; and
- Grading/land development guidelines to ensure that manufactured slopes within or adjacent to the MHPA are included in the development footprint.

Through implementation of these policies, subsequent projects will be consistent with the MSCP Subarea Plan. As such, the CCPU itself, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan land use adjacency guideline requirements.

5.3.2 TOXICS

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the MSCP toxics guidelines and to ensure that potentially toxic chemicals are not released into the MHPA. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan Section 1.4.3. As such, the CCPU, as a programmatic document that guides planning and would not change MSCP consistency requirements for subsequent projects, is consistent with the MSCP Subarea Plan toxics requirements.

5.3.3 LIGHTING

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the lighting guidelines and to ensure lighting adjacent to the MHPA is directed away from the MHPA or shielded to protect the MHPA and sensitive species from unnatural night lighting. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan Section 1.4.3. As such, the CCPU itself, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan lighting requirements.

5.3.4 NOISE

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the noise guidelines and to avoid and minimize noise impacts on wildlife that utilize the MHPA. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan noise requirements.

5.3.5 BARRIERS

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the barrier guidelines and to ensure new development adjacent to the MHPA provides barriers to direct public access to appropriate locations and reduce domestic animal predation. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan barriers requirements.

5.3.6 INVASIVES

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the invasive species guidelines and to ensure that no invasive, non-native plant species are introduced into the MHPA. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan invasives requirements.

5.3.7 BRUSH MANAGEMENT

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the brush management guidelines and to ensure that appropriate set backs and safety measures are in place for residential projects adjacent to the MHPA. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan brush management requirements.

5.3.8 GRADING/LAND DEVELOPMENT

Projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the grading/land development guidelines, as discussed above, to ensure that manufactured slopes within or adjacent to the MHPA are included in the development footprint. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan.

5.4 GENERAL MANAGEMENT GOALS AND OBJECTIVES

Section 1.5.1 of the MSCP Subarea Plan outlines the plan's habitat management goals and objectives that apply to the entire subarea. The habitat management component of the MHPA is essential to meeting the overall goal of the MSCP, which is to maintain and enhance the biological diversity in the region while also conserving viable populations of sensitive species and their habitats. By doing this, local extirpations and extinctions will be prevented and future species' listings will be minimized while allowing for responsible economic growth in the region.

In addition to the general management goals and objectives that apply to the entire City MHPA system the MSCP includes specific management directives for various planned areas throughout the City.

Future site-specific projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the MSCP general management goals and objectives as well as the Urban Areas objectives. Through implementation of these policies, these future projects will be consistent with the MSCP Subarea Plan. As such, the CCPU itself, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan.

5.5 GENERAL MANAGEMENT DIRECTIVES

Section 1.5.2 of the MSCP Subarea Plan outlines the plan's general management directives that support the objectives listed in Section 1.5.1. These directives are organized by priority to assist decisions on where to spend limited funds and direct mitigation efforts. Priority 1 refers to directives that protect resources in the MHPA, including management actions that are necessary to ensure that MSCP-covered species are adequately protected, and Priority 2 refers to directives other than those required for MSCP-covered species status and other long-term conservation actions that can be implemented during the life of the MSCP Subarea Plan as funds become available. The directives outlined in Section 1.5.2 of the MSCP Subarea Plan are generally performed by the City department responsible for MHPA lands; however, where applicable, the directives would apply to projects within the CCPA. Future projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the general management directives presented in Section 2.3.2.3, above.

Section 1.5.2 of the Subarea Plan includes directives for 'Public Access, Trails, and Recreation'. Several of these directives would apply to projects that may be developed under the CCPU. The CCPU includes several proposed new trails and recreational facilities within or near MHPA lands (as depicted in Figure 6.1 of the draft CCPU). The proposed trail locations within the MHPA occur within Tecolote Canyon and Marian Bear Memorial Park which are each managed by Natural Resource Management Plans. Therefore, the development of proposed future trails and pocket parks will be guided by MSCP requirements as well as applicable management plans. The CCPU proposes the following new trail connections and pocket parks within the MHPA or open space:

- Marian Bear Trailhead Pocket Park
- North Way Trailhead Pocket Park
- Regina Avenue Trailhead Pocket Park
- Mount Alifan/Mount Almagosa Canyon Trails
- Via Bello Trail
- Acworth Avenue Pocket Park
- Genessee/Mesa College Trail

In addition, the CCPU includes a potential trail connection "through Tecolote Canyon south of Mount Acadia Boulevard and adjacent to the Tecolote Canyon Golf Course" (ME-4; Draft CPU, 2020a), but a specific trail location has not been identified or mapped.

Detailed plans have not been developed for these facilities, and project-specific biological surveys have not been completed for the facilities. As such, the proposed facilities are addressed at a programmatic level herein.

Once specific plans are developed, they will be analyzed for compliance with the Public Access, Trails, and Recreation directives relevant to facilities planning, as well as applicable natural resource management plan enhancement and maintenance guidelines including providing sufficient signage to clearly identify public access to the MHPA; locating facilities in the least sensitive areas of the

MHPA; avoiding paving trails; ensuring all trails are the minimum width necessary to preserve corridors and adjacent resources; limit the extent and location of equestrian trails to the less sensitive areas of the MHPA; prohibiting off-road or cross-country vehicle activity use in the MHPA (i.e. incompatible use), except for law enforcement, preserve management or emergency purposes; limiting recreational uses to passive uses; removing homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures; and designing and maintain trails where possible to drain into a gravel bottom or vegetated (e.g. grass-lined) swale or basin to detain runoff and remove pollutants.

Based on regional mapping and approximate planned locations, the proposed Marian Bear Trailhead Pocket Park is planned within existing disturbed land, so would be consistent with MSCP planning requirements. The proposed North Way Trailhead Pocket Park is within Diegan coastal sage scrub habitat and may occur within or adjacent to southern riparian forest that is mapped in the National Wetland Inventory as Freshwater Forested/Shrub Wetland. The Regina Avenue Pocket Park is proposed within chaparral habitat and may be partially within or immediately adjacent to southern maritime chaparral habitat. Within Tecolote Canyon, the trails in the canyon between Mount Alifan and Mount Almagosa Streets are proposed within maritime succulent scrub, and a portion of the eastern trail may be within or adjacent to scrub oak chaparral habitat. The bottom of the canyon is also identified in the National Wetland Inventory as a riverine resource. Based on the location of the smaller, eastern trail depicted in the CCPU, the trail does not connect to any existing trails. As such consideration should be given to potential indirect effects; and to the creation of unauthorized trails or subsequent need to authorize currently unauthorized trails in order for the new trail to connect to nearby access points.

Moving southeast near Genessee Avenue, the proposed trail near Via Bello appears to be proposed within an existing utility easement and primarily within disturbed land. Thus, this proposed trail would be consistent with MSCP planning goals. To the east of that trail is the proposed Acworth Avenue Pocket Park. This is located near an existing trailhead and parking area within lands mapped as non-native grassland. As such, this location would be consistent with MSCP General Management Directives. Further east and near the Mesa Community College campus, a trail is proposed adjacent to MHPA lands. As this site is outside MHPA lands it would not conflict with MSCP directives regarding trails within the MHPA. Similarly, the proposed Mount Lawrence Pocket Park on the western edge of the CCPA near Balboa Avenue is outside the MHPA and would not conflict with MSCP trail planning policies.

The potential trail connection “through Tecolote Canyon south of Mount Acadia Boulevard and adjacent to the Tecolote Canyon Golf Course” has been identified only by this general location description. The habitat along Mount Acadia Boulevard includes Diegan coastal sage scrub as well as riparian habitats, and coastal California gnatcatcher have been reported in that area (CNDDB).

Additional site-specific information will be required to determine conformance with MSCP planning directives for these potential facilities. Based on preliminary siting information, regional vegetation mapping and database information, potentially significant impacts related to MSCP public access, trails, and recreation directives could occur with implementation of the proposed CCPU trail and facilities developments.

5.6 SPECIFIC MANAGEMENT POLICIES AND DIRECTIVES FOR URBAN HABITAT LANDS

In addition to general management directives, the MSCP Subarea Plan has area specific guidelines and recommendations for various areas of the City including Otay Mesa area, the Otay River Valley, the Tijuana River Valley, the Eastern Area, Urban Areas, the Northern Area, Lake Hodges and the San Pasqual Valley, and Cornerstone Lands). Areas that are mapped as MSCP Urban Lands occur within the CCPA.

Urban Habitat Lands are described as: (1) a system of canyons that provide habitat to native species that continue to use these Urban Habitat Lands, (2) habitats that provide ‘stepping stones’ for migratory bird species and those establishing new territories, and (3) environmental education opportunities for individuals who visit these natural areas.

For a listing of the MSCP management policies and directives for Urban Habitat Lands, please refer to Section 2, above. The MSCP Subarea Plan does not include any specific management directives for Urban Habitat Lands, but notes that MHPA urban habitats that are part of natural resources parks should be managed pursuant to site-specific Natural Resource Management Plans. The Subarea Plan notes that “all other urban lands included within the MHPA should be managed, to the extent possible, according to the general management policies and directives. If in the future special management needs or issues for specific areas arise, these should be resolved by the MHPA (preserve) managers according to the adaptive management strategy, and through coordination with the MSCP habitat management technical committee. All management actions resolved in this manner should be documented, and all follow up actions, including monitoring, should also be documented in order to determine trends, and gain knowledge and feedback useful for continued management of these lands.” (City of San Diego, 1997a)

Future projects within the CCPA will be analyzed on a project-by-project basis to ensure compliance with the management policies and directives for Urban Habitat Lands, as applicable. Through implementation of these policies, these projects will be consistent with the MSCP Subarea Plan. As such, the CCPU itself, as a programmatic document that guides planning, is consistent with the MSCP Subarea Plan Urban Habitat directives.

6 Impacts

This section provides a programmatic analysis of potential biological resource impacts of the CCPU and future individual projects within the CCPA. This guidance is based on current existing federal, state, and local standards and regulations applicable to biological resources. For projects within the CCPA that may affect sensitive biological resources, potential impacts to such sensitive biological resources must be assessed to determine if they are significant and if avoidance, minimization, and/or mitigation measures are required. Future projects within the CCPA should include an updated literature review and database search to obtain current information for applicable existing programs, plans, and regulations, as these documents are revised frequently to address changing environmental conditions.

6.1 IMPACT DEFINITIONS

A project may result in direct, indirect, and/or cumulative impacts to biological resources. Projects within the CCPA should define potential project impacts according to the CEQA impact definitions presented in the City's Biology Guidelines, which are as follows (City 2018b):

- **Direct Impacts** are defined as “a physical change in the environment which is caused by and immediately related to the project” (City 2018b). For example, vegetation removal resulting from brushing, grubbing, grading, trenching, and excavating is considered a direct impact.
- **Indirect Impacts** are defined as “a physical change in the environment, which is not immediately related to the project, but which is caused indirectly by the project” (City 2018b). Indirect impacts include physical changes in the environment caused by a direct impact. For example, dust from heavy equipment use during grading could settle on nearby vegetation and interfere with photosynthesis and cause an indirect impact, or the noise levels resulting from construction equipment could interrupt reproductive behavior within adjacent sensitive avian breeding habitats during the breeding season and cause an indirect impact.
- **Cumulative Impacts** are defined as “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects” (Association of Environmental Professionals 2020). Examples include the cumulative changes associated with urban development that result in habitat fragmentation; increased traffic, runoff, and noise levels; alteration of natural landscapes; wildlife movement restrictions; and introduction of invasive species.

Projects that conform to the MSCP and VPHCP typically do not result in significant cumulative impacts. However, a rare circumstance could occur where impacts from a future project on a particular sensitive species not covered by the MSCP may still result in a cumulative/significant impact. Similarly, all impacts to vernal pools and native grasslands (greater than 0.1 acre) are considered cumulatively significant. In this case, the future site-specific project's biological resources report would identify the impacted biological resources and describe why a cumulative impact still exists regardless of the habitat level protection provided by the MSCP.

6.2 IMPACT ANALYSIS

The draft CCPU lays forth a plan for growth within the CCPA. Clairemont is a community that is already relatively built out and, as such, new growth will generally occur within previously developed areas. Most projects that will occur under the CCPU would go through the same biological review process and be subject to the same regulations that are currently required; no change in regulatory requirements would occur for most projects with CCPU implementation as compared with current requirements. The CCPU identifies some new public facilities within known ESL areas that could result in potentially significant impacts. These facilities could be developed under current regulations (i.e., without identification in the CCPU), and the projects would go through the same review process; however, identification within a community plan lends project legitimacy and

additional likelihood of approval. As such, potentially significant impacts on habitat could occur with project implementation, and potentially significant impacts on special-status species and aquatic areas may occur, if present, with project implementation.

6.2.1 ESSENTIAL PUBLIC PROJECT DEVIATIONS ANALYSIS

Under the Biology Guidelines [section 143.0150(d)], public projects may qualify as “Essential Public Projects” if they are identified in an adopted land use plan like a community plan. With a designation as an Essential Public Project, such projects are eligible for deviations from the City’s Biology Guidelines, and restrictions regarding wetlands and other ESL impacts can be waived for such essential facilities (under certain conditions). Note that there are other types of wetland deviations; however, implementation of the CCPU would not alter the options or enforcement of those deviations.

The CCPU identifies several new facilities as outlined in Section 5.5 that may now qualify as Essential Public Facilities under ESL regulations. Most of these facilities do not appear to be sited within aquatic areas with the exception of the Mount Alifan and Mount Almagosa Streets trail and, potentially, the North Way Trailhead Pocket Park. However, project specific boundaries are not available for these sites and further project-specific analysis will be required to determine impacts.

Per the Blueprint PEIR, determination of exact impacts on wetlands cannot be made at the programmatic level but would be determined as future site-specific development/redevelopment occurs and identifies existing potential wetland resources and jurisdictional wetlands consistent with the requirements of the federal and state agencies, ESL Regulations, and Biology Guidelines. At a project level of review, as future-site specific development/redevelopment proposals occur, it is anticipated that the City’s regulatory framework would be adequate to ensure that potential impacts are avoided, minimized, mitigated or a wetland deviation has been approved (outside of the coastal zone) so that no net loss of wetlands would result from development. For example, per the City’s MSCP Subarea Plan, ESL Regulations and Biology Guidelines, mitigation for sensitive biological wetland resources involves prioritizing avoidance and minimization of future impacts, compensatory measures that would result in a biologically superior net gain in overall function, and restoring or creating wetlands per Table 2a of the Biology Guidelines. Potential future site-specific projects that may impact vernal pools require additional mitigation requirements as outlined in the ESL Regulations and Biology Guidelines. “compensating” for impacts through off-site acquisition, on-site preservation, habitat restoration, or in limited cases, monetary compensation. Therefore, a conservative analysis of future development is anticipated to result in wetland impacts, which would be considered a significant impact.

6.2.2 SUBSEQUENT PROJECT IMPACT ANALYSIS

As described above, subsequent projects within the CCPA have the potential to impact biological resources. These projects would be analyzed at the project-specific level to ensure conformance with all biological regulations and mitigation requirements described below. No changes in requirements would result from implementation of the CCPU.

All subsequent projects within the CCPA that could result in significant impacts to sensitive biological resources will be required to adequately identify and quantify potential project impacts pursuant to the City's ESL Regulations and Biology Guidelines. Per the City's Biology Guidelines, a biological resources report would be required for all proposed development projects which are subject to the ESL Regulations and/or where the subsequent CEQA review has determined that there may be a significant impact on other biological resources considered sensitive per the City's CEQA Significance Determination Thresholds (City 2022).

Within the CCPA, Figures 4 and 5 depict the locations where known sensitive biological resources occur. Note that these locations are based on current database query only, and no field surveys were performed as part of this effort; all subsequent projects with potential resources present would be required to have a site-specific biological analysis, and sensitive resources not depicted in Figure 4 or Figure 5 may be identified during individual project-specific field surveys.

While future development of the CCPA will generally be focused outside of the sensitive biological resource areas, impacts to sensitive biological resources may occur as a result of subsequent development. Where ESL may be present, a biological resources report would be required to evaluate resources present and potential impacts to ensure future development is consistent with the City's Biology Guidelines, MSCP Subarea Plan, and VPHCP.

As outlined in Section III.A.1 of the City's Biology Guidelines, field surveys would be conducted as-needed and following the guidance provided in Table 1 – Summary of Biological Survey Requirements to adequately identify the biological resources within and adjacent to the project site; and clearly identified on a map of an appropriate scale. Field surveys for state-listed or federally listed sensitive, MSCP-covered, and/or VPHCP-covered species surveys are typically valid for up to 24 months, after which they would be updated, as appropriate, to accurately reflect the biological resources on the project site.

Once biological resources within and adjacent to the project site are identified and mapped, the impacts would be analyzed following the guidance provided in the City's Biology Guidelines and the City's CEQA Significance Determination Thresholds (City 2022). Per Section III.A.2 of the City's Biology Guidelines, the biological resources report should identify all potential project impacts to sensitive biological resources from development (both on-site impacts and off-site impacts) and to other significant biological resources as determined by the CEQA process (i.e., sensitive, non-covered species). The biological resources report would also analyze the significance of these impacts, including an analysis of direct impacts, indirect impacts, and cumulative impacts.

The City's CEQA Significance Determination Thresholds (City 2022) are used to determine the significance of impacts to biological resources. Per these guidelines, a proposed project would be considered to have a significant impact to biological resources if it would result in:

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by CDFW or the USFWS;
- A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or the USFWS;

- A substantial adverse effect on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption or other means;
- Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites;
- A conflict with the provisions of the MSCP, VPHCP, or other adopted Habitat Conservation Plan (HCP), Natural Community Conservation Program (NCCP), or other approved local, regional, or state HCP, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open area.

Significance determinations for direct and indirect impacts to biological resources resulting from subsequent projects within the CCPA would be evaluated through the CEQA review process; and the City's regulatory framework for addressing biological resources impacts including the City's ESL Regulations, Biology Guidelines, MSCP, and VPHCP. Impacts would be considered in the context of the subsequent projects to ensure all potentially significant impacts are avoided or minimized to the extent feasible and that appropriate mitigation measures are implemented to reduce the significance of the impacts, as applicable.

6.2.3 CUMULATIVE IMPACT ANALYSIS

The MSCP Subarea Plan was designed to compensate for the regional loss of biological resources throughout the region. Projects that conform with the MSCP Subarea Plan and other City programs and regulations are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through IV and the MSCP-covered plant and wildlife species. However, the following would be considered significant cumulative impacts:

- All direct impacts to vernal pools are significant and cumulatively significant. Impacts to vernal pools may be mitigated in accordance with the criteria in the City's Biology Guidelines and the VPHCP.
- Direct impacts to perennial native grasslands that are greater than 0.1 acre are significant and cumulatively significant. Direct impacts to this habitat type are mitigated via Tier I per the City's Biology Guidelines. Cumulative impacts may be mitigated only via creation at a 1:1 ratio or greater with the feasibility of creation to be evaluated on a case-by-case basis.
- Impacts to species covered by the MSCP (see Appendix A of MSCP Subarea Plan) generally would not be considered cumulatively significant, provided the project is in full compliance with the MSCP Subarea Plan MSCP-covered species conditions of coverage and its implementing regulations.
- Impacts to state-listed or federally-listed species not covered by the MSCP may be considered cumulatively significant. Each future site-specific project will be evaluated on a case-by-case basis.

It is expected that many other sensitive species not analyzed for coverage under the MSCP will be adequately conserved through the MSCP's habitat-based mitigation plan. For projects within the CCPA, the project-specific biological resources report would identify those species and determine whether a cumulative impact still exists in light of the habitat level of protection provided by the MSCP Subarea Plan. Depending on the size of the impact and the sensitivity of the species, certain non-covered species could be considered rare enough to conclude cumulatively significant impacts and may require additional avoidance, minimization, and/or mitigation measures to reduce these impacts to below a level of significance. As such, potential cumulative biological impacts are potentially significant.

7 Avoidance, Minimization, and Mitigation

Mitigation is the process of reducing significant impacts to below a level of significance. The process of identifying biological mitigation under the City's Biology Guidelines, ESL Regulations, and CEQA review process consists of two parts (1) the identification of significant biological impacts (as described in Section 6.0 above) and (2) the identification of the corresponding mitigation requirements to reduce impacts to below a level of significance.

For unavoidable project impacts, subsequent site-specific project analysis would include a biological resources report that includes a Mitigation Program that identifies a plan of action to reduce significant impacts to below a level of significance as required in the most recent version of the City's Biology Guidelines. The City's Biology Guidelines (City 2018b) requires mitigation to be based on the type and location of the impacted habitat, and for uplands, mitigation is also based on the location of the mitigation site. A typical Mitigation Program includes three required elements: (1) Mitigation Element (Section III.B.1 of the City's Biology Guidelines); (2) Protection and Notice Element (Section III.B.2 of the City's Biology Guidelines); and (3) Management Element (Section III.B.3 of the City's Biology Guidelines). The Mitigation Element, which is discussed in detail in Section 7.2.1 below, consists of a discussion of the amount (e.g., quantity) and the type (e.g., method) of mitigation. The Protection Element, which is discussed in Section 7.2.2 below, would identify the specific actions incorporated into the project to protect any areas offered as mitigation. The Management Element, which is discussed in detail in Section 7.2.3 below, would provide assurances that the mitigation would be adequately managed and monitored in a manner consistent with Section 1.5, Preserve Management of the MSCP Subarea Plan and/or Section 5.3.2 and Chapter 7 of the VPHCP, as appropriate.

7.1 Avoidance and Minimization Measures

Projects within the Clairemont CPA should be designed to include the following measures to avoid or minimize potential project impacts to sensitive biological resources to the maximum extent feasible. Prior to issuance of a Notice to Proceed (NTP), the Development Services Department (DSD) Environmental Designee (ED) shall review and approve all construction documents (plans,

specifications, details, etc.) to ensure these requirements, considered either project conditions or part of the project's Mitigation Monitoring and Reporting Program (MMRP), are incorporated.

7.1.1 PRE-CONSTRUCTION MEASURES

The following avoidance and minimization measures should be incorporated prior to construction.

7.1.1.1 Biologist Verification

The owner/permittee shall provide a letter to the City Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City's Biology Guidelines, has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

7.1.1.2 Pre-Construction Meeting

The Qualified Biologist shall attend the pre-construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting, including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

7.1.1.3 Biological Documents

The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports, including but not limited to maps, plans, surveys, survey timelines, or buffers are completed or scheduled per the City's ESL Regulations, Biology Guidelines, MSCP Subarea Plan, VPHCP, project permit conditions, CEQA, endangered species acts, and/or other local, state, or federal requirements.

7.1.1.4 Biological Construction Mitigation/Monitoring Exhibit

The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents mentioned above. In addition, it shall include: (1) resource delineation, (2) avian construction avoidance areas/noise buffers/barriers, (3) other impact avoidance areas (e.g., avoidance of vegetation removal, limit vegetation trampling and trimming), and (4) any subsequent biological monitoring requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC necessary to assure impact avoidance. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

7.1.1.5 Avian Protection Requirements

To avoid any direct impacts to coastal California gnatcatcher or any species identified as listed, candidate, sensitive, or special status in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur

during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting for sensitive bird species in the proposed area of disturbance. The preconstruction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to the City's DSD for review and approval prior to initiating any construction activities.

If nesting behaviors for any sensitive bird species are detected, a letter report in conformance with the City's Biology Guidelines and applicable state and federal laws (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or Resident Engineer and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

7.1.1.6 Resource Delineation

Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

7.1.1.7 Education

Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew to conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, clarify acceptable access routes/methods and staging areas).

7.1.2 CONSTRUCTION MEASURES

The following avoidance and minimization measures should be incorporated during construction.

7.1.2.1 Monitoring

All construction activities (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on the construction drawings and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the preconstruction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV), if needed for the project. If a

CSVr is required, it shall be emailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

7.1.2.2 Subsequent Resource Identification

The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

7.1.3 POST-CONSTRUCTION MEASURES

The following avoidance and minimization measures should be completed following construction.

7.1.3.1 Impact Verification

In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City's Biology Guidelines, ESL Regulations, MSCP Subarea Plan, CEQA, and other applicable local, state, and federal laws.

7.1.3.2 Final BCME and Biological Monitoring Report

The Qualified Biologist shall submit a final BCME and final biological monitoring report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

Projects within the CACPA that have the potential to impact biological resources, a biological resources report would be required to ensure consistency with the MSCP and the City ESL Regulations. The project-specific biological analysis would identify avoidance, minimization, and/or mitigation as appropriate, on a project-by-project basis, based on proximity to the MHPA and ESL lands and the resources documented on-site.

7.2 Mitigation Program

If impacts to biological resources cannot be avoided through implementation of the measures described in Section 6.1, above, then the project will include a Mitigation Program which identifies a plan of action to reduce significant impacts to below a level of significance. The Mitigation Program will consist of three required elements: (1) Mitigation Element, (2) Protection and Notice Element, and (3) Management Element. Each element is further described below. This Mitigation Program must be incorporated in the permit conditions and/or subdivision map and the construction specifications for public projects, and shown on the construction plans as appropriate. The biological resources report must also provide evidence that the nature and extent of the mitigation proposed is reasonably related (nexus) and proportional to the adverse biological impacts of the proposed development.

7.2.1 MITIGATION ELEMENT

The following guidelines are provided in the City's Biology Guidelines to achieve consistency and equity among projects. Mitigation for specific projects may differ depending on site-specific conditions as supported by the project-level analysis. This section describes the mitigation requirements for upland and wetland habitats, mitigation methods, and species-specific mitigation requirements.

7.2.1.1 Mitigation for Upland Impacts

The MSCP Subarea Plan identifies the conservation and management of the MHPA. The habitat-based level of protection afforded by the implementation of the MHPA is intended to meet the mitigation obligations of MSCP-covered species and most likely the majority of species determined to be sensitive pursuant to the CEQA review process.

The City has adopted a policy that development should be conserved. While this would result in the depletion (net loss) of the existing inventory of sensitive biological resources, the successful implementation of the MSCP would retain the long-term viability and avoid further extirpation of many of San Diego's sensitive species. Therefore, for upland habitats, measures that contribute towards overall implementation of the MSCP may be considered as mitigation, even when a net loss of the existing inventory of sensitive biological resources occurs.

Upland Impacts Within the MHPA (Outside the Coastal Overlay Zone)

Where the MHPA covers more than 75 percent of a premise, development will be limited to the amount necessary to achieve a development area of 25 percent of the premise, based upon the development area regulations of the Open Space Residential Zone (OR-1-2 Zone). No mitigation will be required for the direct impacts to uplands associated with this development area.

City linear utility projects (i.e., sewer and water pipelines) are exempt from the development area limitation but need to mitigate all direct impacts in accordance with Table 6, below. Likewise, all projects processed through a deviation would need to provide mitigation in accordance with Table 6 for impacts beyond the allowable development area of the OR-1-2 Zone.

Table 6. Upland Mitigation Ratios*

Tier	Habitat Type	Mitigation Ratios			
Tier I (Rare Uplands)	Southern Foredunes	Tier I Mitigation Ratios		Location of Preservation	
	Torrey Pines Forest			Inside MHPA	Outside MHPA
	Coastal Bluff Scrub				
	Maritime Succulent Scrub				
	Maritime Chaparral	Location of Impact	Inside MHPA	2:1	3:1
	Scrub Oak Chaparral		Outside MHPA	1:1	2:1
	Native Grassland				
	Oak Woodlands				

Tier II (Uncommon Uplands)	Coastal Sage Scrub				
	CSS/Chaparral	Tier II Mitigation Ratios		Location of Preservation	
				Inside MHPA	Outside MHPA
		Location of Impact	Inside MHPA	1:1	2:1
			Outside MHPA	1:1	1.5:1

Tier IIIA (Common Uplands)	Mixed Chaparral				
	Chamise Chaparral	Tier IIIA Mitigation Ratios		Location of Preservation	
				Inside MHPA	Outside MHPA
		Location of Impact	Inside MHPA	1:1	1.5:1
Outside MHPA	0.5:1		1:1		
Tier IIIB (Common Uplands)	Non-Native Grasslands	Tier IIIB Mitigation Ratios		Location of Preservation	
				Inside MHPA	Outside MHPA
		Location of Impact	Inside MHPA	1:1	1.5:1
			Outside MHPA	0.5:1	1:1
Tier IV (Other Uplands)	Disturbed Land				
	Agriculture				
	Eucalyptus Woodland				
	Ornamental Plantings	Tier IV Mitigation Ratios		Location of Preservation	
				Inside MHPA	Outside MHPA
	Location of Impact	Inside MHPA	0:1	0:1	
		Outside MHPA	0:1	0:1	
*No mitigation would be required for impacts within the base development area (25 percent) occurring inside the MHPA. Mitigation for any impacts from development in excess of the 25 percent base development area for community plan public facilities or for projects processed through the deviation process would be required at the indicated ratios.					

For upland impacts summarized in Table 6, these additional notes apply:

- For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
- For impacts to Tier II, IIIA and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I through III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
- Mitigation for impacts to occupied burrowing owl habitat (at the MSCP Subarea Plan specified ratio) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements.

Upland Impacts Outside of the MHPA (Outside the Coastal Overlay Zone)

Where the MHPA covers less than 75 percent of a premise, no development will be allowed within the MHPA. Upland mitigation, based upon the ratios set forth in Table 6, above, will be required for all significant biological impacts. These ratios are based upon the rarity of the upland resources as characterized by one of the four Tiers listed in the table. Due to the critical nature and high biological value of the MHPA, mitigation should be directed to the MHPA. Thus, a lower mitigation ratio may be applied for projects that propose to mitigate inside of the MHPA. Lands outside the MHPA containing Narrow Endemic Species will be treated as if the land was inside the MHPA for purposes of mitigation.

The mitigation requirement would be evaluated against any portion of the premise within the MHPA that is left undeveloped as a condition of the permit. If the portion of the premise containing the MHPA is equal to or greater than the mitigation requirement, then no further mitigation would be required. Any acreage of the mitigation requirement not satisfied on-site will be required to be mitigated off-site.

Mitigation located inside the MHPA for all Tier I impacts must be in-tier but may be out-of-kind. For impacts to Tier II, IIIA, or IIIB habitats (excluding occupied burrowing owl habitat), the mitigation could (1) include any Tier I, II, IIIA, or IIIB habitats (out-of-kind) within the MHPA or (2) occur outside of the MHPA within the affected habitat type (in-kind). Mitigation for impacts to occupied burrowing owl habitat (at the MSCP Subarea Plan specified ratio/Table 5 of the City's Biology Guidelines) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements.

7.2.1.2 Mitigation for Wetlands Impacts

The ESL Regulations require that impacts to wetlands be avoided, unless approved through the deviation process. Unavoidable impacts should be minimized to the maximum extent practicable and mitigated to below a level of significance.

As part of the project-specific environmental review pursuant to CEQA, the project design will be evaluated to determine if it is a Biologically Superior Option (see Section III.A.2.ii.C of the City's Biology Guidelines), all unavoidable wetlands impacts will be analyzed, and mitigation will be required in accordance with Table 7 and/or Table 8, below; mitigation should be based on the impacted type of wetland habitat and project design. Mitigation should prevent any net loss of wetland functions and values of the impacted wetland.

Table 7. Standard Wetland Mitigation Ratios for Biologically Superior Design

Habitat Type	Mitigation Ratio
Coastal Wetlands	
Salt Marsh	4:1
Salt Panne	4:1
Riparian Habitats	
Oak Riparian Forest	3:1
Riparian Forest or Woodland	3:1
Riparian Scrub	2:1
Riparian Scrub in the Coastal Overlay Zone	3:1
Freshwater Marsh	2:1
Freshwater Marsh in the Coastal Overlay Zone	4:1
Natural Flood Channel	2:1
Disturbed Wetland	2:1
Vernal Pools	2:1 to 4:1*
Marine Habitats	2:1
Eelgrass Beds	2:1
*Mitigation for vernal pool impacts consistent with the VPHCP shall be 2:1 for listed fairy shrimp or when no listed plant species are present, 3:1 for San Diego button celery, and 4:1 when listed species with very limited distributions (e.g., <i>spreading navarretia</i> , <i>San Diego mesa mint</i> , <i>California Orcutt grass</i> , and <i>Otay mesa mint</i>) are present. While the ratio is applied to the basin area, the mitigation site must include appropriate watershed to support restored and/or enhanced basins.	

Table 8. Extraordinary Wetland Mitigation Ratios for Non-Biologically Superior Design

Habitat Type	Mitigation Ratio
Coastal Wetlands (salt marsh, salt panne)	8:1
Riparian Forest or Woodland (oak, sycamore, or willow)	6:1
Riparian Scrub	4:1
Freshwater Marsh	4:1
Natural Flood Channel*	4:1
Disturbed Wetland*	4:1
Vernal Pools	4:1 to 8:1
*Preference for these habitats is out-of-kind mitigation with better habitat. In-kind could be considered where it would clearly benefit sensitive species and result in a biologically superior alternative.	

For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved; and the Biologically Superior Option mitigation shall include either:

- Standard mitigation per Table 12 including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; AND a biologically superior project design whose avoided area(s):
 - is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or
 - conserves the rarest and highest quality on-site biological resources.
- For a project not consistent with the Biologically Superior Option described above, extraordinary mitigation per Table 13 is required. Examples of increased function and value include, but are not limited to, an increase in the availability of habitat for native fauna, an increase in native flora diversity, a decrease in invasive species, an increase in ground water recharge, water quality improvements and sedimentation deposition rates. Success criteria using the best currently available information for the particular mitigation habitat shall be required as part of the restoration or creation plan.

Additional Requirements for Vernal Pool or VPHCP-Covered Species Mitigation

Mitigation for projects impacting vernal pools or VPHCP-covered species shall conform to the VPHCP, including salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same vernal pool series), and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire vernal pool watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

Types of Wetland Mitigation

The following list provides operational definitions of the four types of activities that constitute wetland mitigation under the City's Biology Guidelines:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.
- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.
- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat functions and values and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands may be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new, in-kind habitat to the fullest extent possible and at the appropriate ratios. In addition, unavoidable impacts to wetlands located within the coastal overlay zone shall be mitigated on-site, if feasible. If on-site mitigation is not feasible, then mitigation shall occur within the same watershed. All mitigation for unavoidable wetland impacts within the coastal overlay zone shall occur within the coastal overlay zone.

Restoration of illegally filled historical wetland areas will not be considered for mitigation and may result in code enforcement actions and/or may require restoration as a condition of project approval. All restoration proposals should evaluate the reason for the historical wetland loss (e.g., placement of fill, changes in upstream or groundwater hydrology), the approximate date of the loss, and to the maximum extent possible, provide a determination as to whether the historical loss was legally conducted based upon the regulatory requirements at the time of the loss and the property ownership at the time of the loss.

The wetland mitigation ratios, set forth in Tables 12 and 13, above, in combination with the requirements for no-net-loss of functions and values and in-kind mitigation, are adequate to achieve the conservation goals of the MSCP Subarea Plan for wetland habitats and the MSCP-covered species which utilize those habitats.

Wetland mitigation required as part of any federal (USACE 404 permit) or state (CDFW 1601/1603 SAA) wetland permit will supersede and will not be in addition to any mitigation identified in the CEQA document for those wetland areas covered under any federal or state wetland permit. Wetland habitat outside the jurisdiction of the federal and state permits will be mitigated in accordance with the CEQA document. Wetland habitat outside the jurisdiction of the federal and state permits will be mitigated in accordance with the CEQA document.

7.2.1.3 Mitigation Methods

Mitigation requirements may be satisfied by one, or a combination, of the following methods, or other methods determined on a case-by-case basis to reduce impacts to below a level of significance. These methods, described below, allow for greater flexibility in mitigation methodology, including off-site acquisition, on-site preservation, habitat restoration, and in limited cases, monetary compensation.

In all cases, mitigation sites must have long-term viability. Viability will be assessed by the connectivity of the site to larger planned open space, surrounding land uses, and sensitivity of the MHPA resources to environmental change. In general, areas within the MHPA are considered to have long-term viability. Areas outside of the MHPA proposed for mitigation may require additional biological studies to support the determination of long-term viability.

Off-Site Acquisition

The purchase or dedication of land with equal or greater habitat value can be considered as a method of mitigation, however, it must occur within the City's jurisdiction, preferably in the MHPA.

"Mitigation Banks" are privately or publicly held lands that sell mitigation credits instead of fee title for habitat areas on which a conservation easement has been placed. Under this method, a large site can be acquired over time by multiple projects requiring small mitigation needs. Purchase of areas of "credits" from an established bank can be acceptable, as long as the required acreage is subtracted from the remaining credits in the bank and is not available for future projects. All banks must have provisions approved for long-term management, can be part of a regional habitat preserve system, and upon request can provide an updated record of the areas (credits) purchased from the bank and those that are remaining.

New mitigation banks must be established pursuant to the "Official Policy on Conservation Banks" (California Resource Agencies 1995) and the "Supplemental Policy Regarding Conservation Banks within the NCCP Area of Southern California" (USFWS 1996). In general, the purchase of credits from mitigation banks located outside of the City's jurisdiction will not be allowed.

On-Site Preservation

The following provides guidance for evaluating the acceptability of on-site preservation as mitigation with respect to the long-term viability of the site.

- Inside the MHPA: For premises that straddle the MHPA, the on-site preservation of lands inside the MHPA, outside of brush management zones, are considered to have long-term viability due to their connectivity to larger planned open space and their contribution toward regional biodiversity preservation. Areas containing Brush Management Zone 2 will be considered impact neutral (not considered an impact and not considered acceptable as a mitigation area). Lands inside the MHPA, outside of brush management zones, will be considered acceptable as mitigation, and no additional studies to support this determination will be required. (Note: Lands outside the MHPA containing Narrow Endemic Species would be considered acceptable as mitigation and would be treated as if the land was inside the MHPA for purposes of mitigation).
- Outside the MHPA: The on-site preservation of lands outside the MHPA may be considered acceptable as mitigation provided they have long-term biological value. Long-term biological value should be assessed in terms of connectivity to larger areas of planned open space, and any potential current or future indirect impacts associated with the urban interface. As indicated above, areas containing Brush Management Zone 2 will be considered "impact neutral" (not considered an impact and not considered as acceptable as a mitigation area).

- Connectivity: Isolated habitat patches have been shown to lack the diversity and resilience of connected systems (Noss 1983, Soule et al. 1988, Temple 1983, Wright and Hubbell 1983 as referenced in the City's Biology Guidelines [2018b]). In most cases, the species first to extirpate (disappear) from these isolated areas are rare species that do not adapt well to human influenced environments. Unfortunately, these species are those targeted for conservation by the MSCP. Areas preserved on-site, but outside of the MHPA, will generally be considered to be acceptable as mitigation only if connected to the MHPA. As a general guideline, areas completely surrounded by development and areas connected by native vegetation of less than 400 feet wide or greater than 500 feet long will be considered isolated and will not count as mitigation.
Site-specific studies with field observations which incorporate the best available scientific information and methods would be necessary to provide a basis for any modification to these standards at the project level. Other factors, such as topography (steep slopes), major road systems, or other large public facility and habitat patch size, will also be considered in assessing potential isolation of a site. Isolated areas may, on a case-by-case basis, be considered for use as mitigation where it can be reasonably demonstrated that the resource can persist in isolation (e.g., Narrow Endemic Species or unique habitats such as vernal pools) or act as "stepping stones" for wildlife movement between portions of the MHPA.
- Urban Interface: The interface (edge) between native plant communities and human-modified areas are considered to be adverse to many native species. Many wildlife species decrease along the edge of habitat due to detrimental conditions, such as increased parasitism (by species such as the brown-headed cowbird), increased nest predation (by species such as jays, raccoons, opossums, and domestic cats and dogs), and increased competition for nesting areas (by starlings and other non-native exotic species) (Brettingham and Temple 1983, Gates and Gysel 1978, Noss 1993, Temple 1987 as referenced in the City's Biology Guidelines [2018b]). Invasion by exotic plants (such as escaped ornamental landscaping) and off-road vehicles also increases along habitat edges (Noss 1983, Alberts et al. 1993, Sauvajot and Buechner 1993, Scott 1993 as referenced in the City's Biology Guidelines [2018b]). Other factors such as increased noise and night-time lighting may also contribute to the adverse conditions. These conditions are collectively called "edge effects." Few studies have attempted to quantify the distance of edge effects. The MSCP indicated that edge conditions range from 200 to 600 feet (61 to 183 meters) depending on adjacent land uses. A 1994 article on avian nest success indicates that the most conclusive studies suggest that edge effects are most predominantly documented within 164 feet (50 meters) of an edge (Patron 1994 as referenced in the City's Biology Guidelines [2018b]).

Habitat Restoration

The restoration of degraded habitat may be considered as mitigation. Habitat restoration may include creation of habitat that was previously converted by human activities and/or the enhancement of existing degraded habitat, where the proposed enhancement increases the habitat quality and biological function of the site.

Decompaction and revegetation of existing roads and trails, removal of exotic invasive species in conjunction with the establishment of native species, and the conversion of agricultural and disturbed lands back to native habitat are examples of acceptable restoration efforts. The removal of trash from a site does not constitute restoration in and of itself but may be a component of the restoration. Any area that will continue to be subjected to periodic clearing (e.g., pipeline maintenance) would not be considered as mitigation. Areas proposed for restoration must contain the appropriate site conditions (e.g., hydrology, slope aspect, soils) for the proposed habitat.

All restoration will be required to have a restoration plan that outlines specific species for planting/hydroseeding; timing; irrigation and grading requirements (if any); a long-term maintenance, monitoring, and reporting program; and criteria for success as well as contingency measures in case of failure. It is expected that monitoring of the restoration would be no less than 5 years but could be completed earlier if the 5-year success criteria were met.

The restoration plan, in accordance with the City's Biology Guidelines, will establish appropriate monitoring and reporting periods. In general, it is expected that quarterly reports will be prepared by the applicant's consultant for the first year and annual reports thereafter to document the status of the restoration effort until deemed complete by the City environmental designee. These reports will identify any necessary remedial measures to be implemented by the applicant upon approval by the City.

A surety bond is required to assure implementation of all restoration efforts. The surety bond can be structured to return certain portions of the bond after demonstrating the successful completion of major restoration milestones (e.g., meeting the success criteria for year three).

The restoration plan should clearly identify the milestones. Further details on CEQA mitigation monitoring can be obtained from the City's MMRP.

Monetary Compensation

In some cases, developments with small impacts may compensate by payment into a fund used to acquire, maintain, and administer the preservation of sensitive biological resources. This fund is intended to be used only for the mitigation of impacts to small, isolated sites with lower long-term conservation value. Use of the fund is determined on a project-by-project basis.

7.2.1.4 Species Specific Mitigation

In general, it is accepted that securing comparable habitat at the required ratio will mitigate for the direct impact to most sensitive species. While this is true for species and generally for those MSCP-covered species conditions of coverage identified in MSCP Subarea Plan Appendix A, with wide geographic distributions and/or large territory sizes, species with very limited geographic ranges

(Narrow Endemic Species) would require additional efforts designed to protect these species. A list of Narrow Endemic Species and other MSCP-covered species is provided in Section I of City's Biology Guidelines, and those with a potential to occur in the Clairemont CPA are discussed in Section 4.3.2, above. If MSCP-covered species are present then any applicable MSCP Subarea Plan conditions of coverage and/or area specific management directives would need to be complied with.

Narrow Endemic Species

The specific actions necessary to protect Narrow Endemic Species must be determined on a case-by-case basis. Transplantation and/or soil salvage are examples of acceptable mitigation methods for some of these species. Fencing, signage, and management are other examples of mitigation. The Mitigation Program discussion in the biological resources report should identify all specific actions related to the mitigation of these Narrow Endemic Species in addition to any other requirements necessary for the mitigation of their habitats.

Other MSCP-Covered Species

In addition to the protection of Narrow Endemic Species required by the MSCP, certain species are only considered adequately conserved as part of the MSCP (e.g., MSCP-covered species) only if translocation/restoration of the species is provided at the project-level (see Table 3-5 of MSCP and Section 1.3 of the MSCP Subarea Plan). These species are wart-stemmed ceanothus, snake cholla, and burrowing owl. This also applies to the restoration/transplantation of any impacted habitat of coastal cactus wren. The first two of these species are plants and may be transplanted or incorporated into any revegetation plan proposed for the site.

Restoration of impacted coastal cactus wren habitat shall include salvage and transplantation of snake cholla, coast cholla (*Cylindropuntia prolifera*), live-forevers (*Dudleya* spp.), coast barrel cactus, fish-hook cactus (*Mammillaria dioica*), coastal prickly pear (*Opuntia littoralis*), chaparral prickly pear (*Opuntia oricola*), our Lord's candle (*Yucca whipplei*), and Mojave yucca (*Yucca schidigera*) to an on-site or off-site restoration site or a receiver site approved by the City.

Within the MHPA, impacts to burrowing owls must be avoided; outside the MHPA, any impacted individuals must be relocated out of the impact area using passive or active methodologies approved by the wildlife agencies.

Impacts to road pools supporting listed fairy shrimp outside the MHPA are authorized provided they are mitigated at a 2:1 ratio consistent with the VPHCP. Within the MHPA, road pools supporting listed fairy shrimp must be avoided, unless a deviation (e.g., Biologically Superior Option as defined in Section III.A.2.ii.C of the City's Biology Guidelines) is approved by the City and wildlife agencies. Impacts will be mitigated at a 2:1 ratio consistent with the VPHCP.

Species specific analysis for sensitive species not covered by the MSCP may be required as part of the CEQA process. It is expected that the majority of CEQA sensitive species not covered by the MSCP will be adequately mitigated through the habitat based mitigation described in Section III of the City's Biology Guidelines. A rare circumstance may arise, however, when mitigation actions

specific to a particular species may be required. The project-level biological resources report will justify why such actions are necessary in light of the habitat level protection provided by the MSCP.

7.2.2 PROTECTION AND NOTICE ELEMENT

The Mitigation Program must provide assurances that areas offered for mitigation or remainder areas in the OR-1-2 Zone not developed but indirectly impacted by the proposed development will be adequately protected from future development. Additionally, adequate notice must be recorded against the title of the property to memorialize the status of mitigation and remainder areas. The Protection and Notice Element will identify the specific actions incorporated into the project to protect any areas offered as mitigation. Dedication and Covenant of Easement are considered to adequately protect mitigation and remainder areas and are discussed in further detail below.

7.2.2.1 Dedication

Dedication in fee title to the City is the preferred method of protecting mitigation areas. It is the City's policy to accept lands being offered for dedication unless certain circumstances prohibit the acceptance, such as the presence of hazardous materials, title problems, unpaid taxes, or unacceptable encumbrances including liens. The City Environmental Designee must recommend, and the City Council must accept, all proposed dedications on a case-by-case basis. Dedication of mitigation sites to other conservation entities (e.g., USFWS, Nature Conservancy, Trust for Public Lands) may also be permissible, if acceptable to the City Environmental Designee.

For vernal pool properties that are dedicated to the City as part of the VPHCP, a deed restriction consistent with California Civil Code Section 815, et seq. and acceptable to the wildlife agencies will be recorded over the mitigation areas.

7.2.2.2 Covenant of Easement

In lieu of dedication in fee title, or granting of a conservation easement, where a project has utilized all of its development area potential as allowed under the OR-1-2 Zone, then as a condition of permit approval, a Covenant of Easement would be required to be recorded against the title of the property for the remainder area, with USFWS and CDFW named as third party beneficiaries. A Covenant of Easement is a legally binding promise made by the property owner with respect to future use of the land. Identification of those permissible passive activities and other conditions of the permit would be incorporated into the Covenant of Easement. The Covenant of Easement would be recorded against the title of the property and would run with the land. The applicant will allow the City limited right-of-entry to the remainder area to monitor the applicant's management of the area.

7.2.3 MANAGEMENT ELEMENT

The Mitigation Program must provide assurances that the mitigation or remainder areas in the OR-1-2 Zone will be adequately managed and monitored in a manner consistent with Preserve Management (Section 1.5 of the MSCP Subarea Plan and/or Section 5.3.2 and Chapter 7 of the VPHCP), as appropriate. The Mitigation Program should identify how the objectives of the City's MSCP and VPHCP Preserve Management recommendations will be met for the area as well as provide any additional management recommendations resulting from site specific information (area

specific management directives). The plan must also identify the responsible entity and funding source for the long-term maintenance and management.

7.2.3.1 Management by the City

In general, the entity that holds the fee title or is granted a conservation easement will be responsible for the management of the mitigation area. If the City is the responsible party, then upon acceptance of the property, the area will be managed in accordance with the MSCP Framework Management Plan as modified by the area specific management directives and the Vernal Pool Management and Monitoring Plan, as appropriate. The project applicant would not be responsible for future monitoring reports or maintenance activities.

For all wetland mitigation sites, funding must be provided to cover the costs of the in-perpetuity management and monitoring. Funding may be provided by a variety of means including, but not limited to, the establishment of an endowment or Community Facilities District. The amount of funding shall be calculated through the use of a Property Analysis Record (PAR) or other similar method. For properties that are deeded to the City in fee title, the PAR or equivalent shall be approved by the Park and Recreation Department prior to City's acceptance of the land.

In no case will the City be required to accept any brush management functions that are made a condition of a discretionary project. It is expected that a homeowners association or similar group will be established for any brush management responsibilities.

7.2.3.2 Private Party Management

If the City does not hold fee title, or a Covenant of Easement is not granted, then the project applicant must provide for the management of the mitigation area. For properties that remain in private ownership or that would be managed by a third party, DSD shall approve the managing entity and the PAR or equivalent to ensure adequate funding for the long-term management and monitoring of the site. The Mitigation Program must include documentation on how the project would implement the objectives of the MSCP Preserve Management and the area specific management directives. The Mitigation Program must identify the responsible entity for long-term maintenance and management, the requirements for future management and monitoring reports, and a secure funding source to pay for the management in perpetuity.

8 References

- Association of Environmental Professionals. 2020. CEQA Portal Topic Paper: Cumulative Impacts. Updated December 18, 2020.
- Baldwin, B. G., D. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. Wilken. 2012. The Jepson Manual: Vascular Plants of California, Thoroughly Revised and Expanded. University of California Press, Berkeley, CA.
- California Consortium of Herbaria. 2025. <https://ucjeps.berkeley.edu/consortium/>. Accessed January 2025.
- California Department of Fish and Wildlife. 2025a. Available at: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx#>. Accessed January 2025.
- California Department of Fish and Wildlife. 2025b. State and Federally Listed Endangered and Threatened Animals of California. State of California, The Resources Agency, Department of Fish and Game Biogeographic Data Branch. Available at: <http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/TEAnimals.pdf>. Accessed March 2020 and January 2025.
- California Department of Fish and Wildlife. 2025c. Special Animals. State of California, The Resources Agency, Department of Fish and Game Biogeographic Data Branch. Available at: <http://www.dfg.ca.gov/whdab/pdfs/SPAnimals.pdf>. Accessed March 2020 and January 2025.
- California Department of Fish and Wildlife. 2025d. State and Federally Listed Endangered, Threatened, and Rare Plants of California. State of California, The Resources Agency, Department of Fish and Game Habitat Conservation Division, Wildlife & Habitat Data Analysis Branch. Available at: <http://www.dfg.ca.gov/whdab/pdfs/TEPlants.pdf>. Accessed March 2020 and January 2025.
- California Department of Fish and Wildlife. 2025e. Special Animals List. Periodic publication. 51 pp. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>
- California Department of Fish and Wildlife (CDFW). 2025f. California Department of Fish and Game Natural Diversity Database (CNDDDB) – Electronic Format. <https://wildlife.ca.gov/Data/CNDDDB>. Accessed February 2020 and January 2025.
- California Native Plant Society (CNPS), Vegetation Program. 2025. A Manual of California Vegetation, Online Edition. <http://www.cnps.org/cnps/vegetation/>; California Native Plant Society, Sacramento, California. Accessed March 2020 and January 2025.
- California Native Plant Society (CNPS), Rare Plant Program. 2025. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org>. Accessed March 2020 and January 2025.
- California Resources Agency, California Environmental Protection Agency. April 1995. Official Policy on Conservation Banks.
- Google Earth Pro. Version 7.3.2.5776. 2025. Clairemont, City of San Diego, San Diego County, California. Accessed March 2020.
- Holland, R. 1986. Preliminary descriptions of the terrestrial natural communities of California. Unpublished document, California Department of Fish and Game, Natural Heritage Division. Sacramento, CA.
- iNaturalist. 2025. <https://www.inaturalist.org/>. Accessed January 2025.
- Jackson, L. 1985. Ecological origins of California's Mediterranean grasses. *Journal of Biogeography* 12: 349-361. Oberbauer, T., Kelly, M., and Buegge, J. March 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," Robert F. Holland, Ph.D., October 1986
- Regional Water Quality Control Board, San Diego Region. February 2016. San Diego Basin Plan Map. Accessed March 2025.
- Reiser, C. H. 2001. Rare Plants of San Diego County. Aquafir Press, Imperial Beach, California.

- Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento. 1300 pp.
- San Diego, City of. 1982. Tecolote Canyon Natural Park Master Plan. The Tecolote Canyon Citizens Advisory Committee. San Diego, City of. 1989. Clairemont Community Plan. adopted by the City Council on Sept. 26, 1989. The Plan was most recently amended on August 1, 2019.
<https://www.sandiego.gov/planning/community/profiles/clairemонтmesa/plan>
- San Diego, City of. 1989. Clairemont Mesa Community Plan. Amended August 2019.
https://www.sandiego.gov/sites/default/files/clairemонт_mesa_cp_2-14-201.pdf
- San Diego, City of. 1994. Marian Bear Memorial Park [San Clemente Canyon] Natural Resource Management Plan. <https://marianbearreccouncil.files.wordpress.com/2013/07/mrg.pdf>
- San Diego, City of 1997a. Multiple Species Conservation Program. City of San Diego MSCP Subarea Plan.
- San Diego, City of. 1997b. City of San Diego MSCP Implementing Agreement Documents.
- San Diego, City of. 2004. San Diego Municipal Code Steep Hillside Guidelines.
- San Diego, City of. 2008. City of San Diego General Plan, Conservation Element, Figure CE-3 Coastal Zone Boundary. Available at: <http://www.sandiego.gov/planning/genplan/pdf/2012/ce120100.pdf>.
- San Diego, City of. 2011. Morena Pipeline Project No. 583432. Available at
https://www.sandiego.gov/sites/default/files/255100_-_final_mnd_date_2-7-18_3.pdf
- San Diego, City of. 2017. Final City of San Diego Vernal Pool Habitat Conservation Plan.
<https://www.sandiego.gov/sites/default/files/vp-mmp.pdf>
- San Diego, City of. 2018a. City of San Diego North City Pure Water Project Final Environmental Impact Report. Prepared by Dudek.
- San Diego, City of. 2018b. San Diego Municipal Code, Land Development Code, Biology Guidelines.
https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf
- San Diego, City of. 2019a. Balboa Station Specific Plan.
https://www.sandiego.gov/sites/default/files/balboa_station_area_specific_plan_september_2019.pdf
- San Diego, City of. 2019b. Morena Corridor Specific Plan.
https://www.sandiego.gov/sites/default/files/morena_corridor_specific_plan_1.pdf
- San Diego, City of. 2020a. Clairemont Community Plan Discussion Draft. https://9ff67c5d-1cd1-49a0-b96c-f60f299d49e.filesusr.com/ugd/a513cc_1090f8c3867042489433daea11f8515a.pdf
- San Diego, City of. 2020b. Mount Etna Community Plan Amendment and Rezone Project Final Environmental Impact Report. <https://ceqanet.opr.ca.gov/2018091016/2>
- San Diego, City of 2020c. Final Environmental Impact Report for the Draft Municipal Waterways Maintenance Plan. Prepared by Dudek.
- San Diego, City of. 2021. Draft Clairemont Community Plan.
https://www.clairemонтplan.org/_files/ugd/a513cc_4f8effdd179a49f0af7e199c96b01763.pdf
- San Diego, City of. 2022. California Environmental Quality Act (CEQA) Significance Determination Thresholds. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf
- San Diego, City of. 2024a. City of San Diego General Plan Amendment, Conservation Element
https://www.sandiego.gov/sites/default/files/2024-07/general-plan_08_conservation_july-2024.pdf
- San Diego, City of. 2024b. 2023 Multiple Species Conservation Program (MSCP) Annual Report.
https://www.sandiego.gov/sites/default/files/2024-06/mscp-2023-annual-report_1.pdf
- San Diego, County of. 1997. Multiple Species Conservation Program (MSCP) County of San Diego Subarea Plan. San Diego, County of. 2025. SanBIOS database. Accessed January 2025 via SanGIS.
- San Diego Geographic Information Source (SANGIS). 2015. MSCP Vegetation. Available at:
<http://www.sangis.org/download/available.html>. March 2020.

- Tremor, Stokes, Spencer, et al. 2017. San Diego County Mammal Atlas. Proceedings of the San Diego Society of Natural History.
- State Water Resources Control Board. 2019. State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. April 2.
- United States Department of Agriculture (USDA). 2020. Natural Resources Conservation Service Web Soil Survey – Electronic Format. Accessed March 2020
- United States Fish and Wildlife Service (USFWS). 1996. Supplemental Policy Regarding Conservation Banks within the NCCP Area of Southern California.
- United States Fish and Wildlife Service (USFWS). 2020a. Occurrence Information and Critical Habitat for Multiple Species within Jurisdiction of the Carlsbad Fish and Wildlife Office.
- United States Fish and Wildlife Service (USFWS). 2020b. Database for Species which require a survey report under Section 10 of the Endangered Species Act.
- United States Fish and Wildlife Service (USFWS). 2025a. National Wetlands Inventory (NWI), Wetlands Mapper. Retrieved from: <http://www.fws.gov/wetlands/Data/Mapper.html>. Accessed January 2025.
- United States Fish and Wildlife Service (USFWS). 2025d. Information for Planning and Consultation (IPaC) Species list. <https://ecos.fws.gov/ipac/location/SFCUU5CICJC3XO424EXAZZBWVM/resources>. Accessed January 2025.
- United States Geologic Survey (USGS). 2018. La Jolla 7.5-minute quadrangle map. https://prd-tnm.s3.amazonaws.com/StagedProducts/Maps/USTopo/PDF/CA/CA_La_Jolla_20180827_TM_geo.pdf.
- Unitt, Philip. 2004. San Diego County Bird Atlas. Proceedings of the San Diego Society of Natural History.

APPENDIX A

EXPLANATION OF STATUS CODES FOR SENSITIVE PLANT AND WILDLIFE SPECIES

APPENDIX A

EXPLANATION OF STATUS CODES FOR SENSITIVE PLANT AND WILDLIFE SPECIES

FEDERAL AND STATE CODES

U.S. FISH AND WILDLIFE SERVICE (USFWS)

- BCC Bird of Conservation Concern
- BGEPA Bald and Golden Eagle Protection Act
- FC Federal candidate species
- FE Federally listed endangered
- FPD Federally proposed for delisting
- FPE Federally proposed endangered
- FPT Federally proposed threatened
- FT Federally listed threatened

USFWS BIRDS OF CONSERVATION CONCERN (BCC)

The primary legal authority for Birds of Conservation Concern (2008) is the Fish and Wildlife Conservation Act of 1980 (FWCA), as amended. Other authorities include the Endangered Species Act, Fish and Wildlife Act (1956) and 16 USC §701. A FWCA 1988 amendment (Public Law 100-653, Title VIII) requires the Secretary of the Interior through the USFWS to “identify species, subspecies, and populations of all migratory non-game birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act of 1973.” The 2008 BCC report is the most recent effort by the USFWS to carry out this proactive conservation mandate.

The BCC report aims to identify accurately the migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent the USFWS’ highest conservation priorities and draw attention to species in need of conservation action. The USFWS hopes that by focusing attention on these highest priority species, the report will promote greater study and protection of the habitats and ecological communities upon which these species depend, thereby ensuring the future of healthy avian populations and communities. Birds of Conservation Concern 2008 lists are available online at <https://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>.

USFWS FEDERAL CANDIDATE (FC) SPECIES

Federal candidate species are those for which the USFWS has on file “sufficient information on biological vulnerability and threats to support a proposal to list as endangered or threatened, but for which preparation and publication of a proposal is precluded by higher-priority listing actions. [The USFWS] maintain[s] this list for a variety of reasons: to notify the public that these species are facing threats to their survival; to provide advance knowledge of potential listings that could affect decisions of environmental planners and developers; to provide information that may stimulate conservation efforts that will remove or reduce threats to these species; to solicit input from interested parties to

help us identify those candidate species that may not require protection under the [Endangered Species Act] or additional species that may require the Act's protections; and to solicit necessary information for setting priorities for preparing listing proposals" (Federal Register 70:90 [May 11, 2005]).

USFWS FEDERAL PROPOSED ENDANGERED (FPE) SPECIES

Any species the Service has determined is in danger of extinction throughout all or a significant portion of its range and the Service has proposed a draft rule to list as endangered. Proposed endangered species are not protected by the take prohibitions of section 9 of the ESA until the rule to list is finalized. Under section 7(a)(4) of the ESA, federal agencies must confer with the Service if their action will jeopardize the continued existence of a proposed species.

USFWS FEDERAL PROPOSED THREATENED (FPT) SPECIES

Any species the Service has determined is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and the Service has proposed a draft rule to list as threatened. Proposed threatened species are not protected by the take prohibitions of section 9, consistent with any protective regulations finalized under section 4(d) of the ESA, until the rule to list is finalized. Under section 7(a)(4) of the ESA, federal agencies must confer with the Service if their action will jeopardize the continued existence of a proposed species.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

- SCE State candidate for listing as endangered
- SCT State candidate for listing as threatened
- SE State listed endangered
- SR State listed rare
- ST State listed threatened
- SSC State species of special concern
- WL Watch List
- FP Fully Protected species refers to all vertebrate and invertebrate taxa of concern to the Natural Diversity Data Base regardless of legal or protection status. These species may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW.
- Special Animal Refers to all vertebrate and invertebrate taxa of concern to the Natural Diversity Database regardless of legal or protection status.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

For plants with no current federal or state legal standing, "CEQA" refers to the fact that under the Act, impacts to species may be found significant under certain circumstances (e.g., the species are regionally sensitive and/or are protected by a local policy, ordinance, or habitat conservation plan; or the impact involves interference with certain movements or migrations, with wildlife corridors or with nursery sites).

OTHER CODES AND ABBREVIATIONS

CALIFORNIA NATIVE PLANT SOCIETY CALIFORNIA RARE PLANT RANK (CRPR) CODES

LISTS

1A = Presumed extirpated in California and either rare or extinct elsewhere. Eligible for state listing.

1B = Rare, threatened, or endangered in California and elsewhere. Eligible for state listing.

2A = Presumed extirpated in California but common elsewhere. Eligible for state listing.

2B = Rare, threatened, or endangered in California but more common elsewhere. Eligible for state listing.

3 = Review List: Plants about which more information is needed. Some eligible for state listing.

4 = Watch List: Plants of limited distribution. Needs monitoring for changes in population status. Few (if any) eligible for state listing.

LIST/THREAT CODE EXTENSIONS

.1 = Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

A “CA Endemic” entry corresponds to those taxa that only occur in California.

All List 1A (presumed extinct in California) and some List 3 (need more information; a review list) plants lacking threat information receive no extension.

Threat Code guidelines represent only a starting point in threat level assessment. Other factors, such as habitat vulnerability and specificity, distribution, and condition of occurrences, are considered in setting the Threat Code.

MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP) COVERED SPECIES

Multiple Species Conservation Program covered species for which the County of San Diego and City of San Diego have take authorization within the MSCP subarea and City of San Diego subarea.

MSCP NARROW ENDEMIC

Narrow endemic species are native species that have “restricted geographic distributions, soil affinities, and/or habitats.” The MSCP participants’ subarea plans have specific conservation measures to ensure impacts to narrow endemics are avoided to the maximum extent practicable.

APPENDIX B

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP / MSCP CONDITIONS OF COVERAGE

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
Plants					
<i>Acanthomintha ilicifolia</i>	85% of 8 major populations	15% of major populations	Site-specific preserve design and special measures/ management	Monitoring Plan – Site Specific (4 populations) and Management Plan/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because all major populations are within the MHPA and each of the eight major populations will be conserved from 80-100 percent, with 85 percent conserved overall. This species is on the list of narrow endemics¹ which requires jurisdictions to specify and implement measures in their Subarea Plans to avoid or minimize impacts to all populations (including Asphalt, Inc., Sky Mesa, El Capitan sites) during project design.

Notes: This species occurs on clay and gabbro soils which will be conserved at 28+ percent and 43+ percent respectively

Conditions: Area specific management directives and the SPA for the Otay Lakes Resort area must include specific measures to protect against detrimental edge effects from the surrounding development.

<i>Agave shawii</i> Shaw's agave none	100% of major populations	No major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because all known extant populations are within protected public land (Torrey Pines State Preserve and Border Field State Park).

This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for the species.

Notes: Additional important populations are found on military lands (Pt. Loma) which are not part of the MSCP. Populations at Pt. Loma are not part of the MSCP, but will be conserved at a minimum of 91 percent in the Pt. Loma Ecological Reserve Area.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects.

<i>Ambrosia pumila</i> San Diego ambrosia none	90% of the only major population	10% of the only major population	Site-specific preserve design and special measures/management	Monitoring Plan – Site Specific (major population) and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered because 90 percent of the only major population in the MSCP will be conserved and the adjoining population at the radio tower site will be 100 percent conserved. This major population occurs on public lands in the Mission Trails Regional Park. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for species.

Notes: The conservation level of this species has changed due to new information. Occurrences in the Spring Canyon, Otay Mesa (East of Otay Lakes), Otay Valley (along the Otay River), and Hidden Trails were misidentified and are now known to be a common species of *Ambrosia*. The small population within the San Diego National Wildlife Refuge (Rancho San Diego) will also be conserved and managed by the USFWS.

Conditions: If more than 10 percent of the populations at the Mission Trails Regional Park is impacted, this species will no longer be a covered species. Area specific management directives must include monitoring of transplanted populations, and specific measures to protect against detrimental edge effects.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Aphanisma blitoides</i> Aphanisma None	90% of potential habitat (261± acres) – 92% of southern foredunes (123± acres), 88% of southern coastal bluff scrub (138± acres)	10% of potential habitat (28+ acres) – 8% of southern foredunes (9± acres), 12% of southern coastal bluff scrub (17± acres)	Preserve design/landscape level with site-specific conservations(s)/management	Monitoring Plan – Habitat Based and Incidental	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 90 percent of its potential habitat will be conserved.

Notes: Additional potential habitat occurs on military lands (Silver Strand, Imperial Beach) which are not a part of the MSCP. There are no known populations of this species.

<i>Arctostaphylos glandulosa</i> var. <i>crassifolia</i> Del Mar manzanita FE/	91% of major populations and 67% of southern maritime chaparral habitat	9% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Astragalus deanei</i> Dean's milk vetch None	Unknown conservation level and therefore not covered by the plan.				NO
<i>Astrogalus tener</i> var. <i>titi</i> Coastal dunes milk vetch PE/CE	92% of southern foredunes (123± acres)	8% of southern foredunes (11± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based and Incidental	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 92 percent of the vegetative community that is potential habitat for this species will be conserved.

Notes: This species is not known to occur within the MSCP.

Conditions: Area specific management directives must provide for reintroduction opportunities, identify potential reintroduction sites, and include measures to prevent non-native species introductions. Any newly found populations shall be evaluated for inclusion in the preserve strategy through acquisition, like exchange, etc.

<i>Baccharis vanessae</i> Encinitas baccharis FT/CE	92% of major populations	8% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific (1 population) and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 92 percent of the major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for the species.

Conditions: Based on BMPs, area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire; and appropriate male/female plant ratios. Management measures to accomplish this may include prescribed fire.

<i>Berberis nevinii</i> Nevin's barberry none	100% of populations (occurrences are all persisting cultivars)	No natural populations present	Site-specific preserve design and special measures/management	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED.

This species will be covered by the MSCP because persisting cultivars occurring in Spring Valley and Torrey Pines State Reserve will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for the species.

Notes: Since no known natural populations occur within the plan area, development covered by the plan will not impact the species. Persistence of naturally occurring populations in the San Diego County is dependent on conservation efforts outside the MSCP area.

<i>Brodiaea filifolia</i> Thread-leaved brodiaea PT/CE	88% of vernal pool habitat, 38% of grassland	12% of vernal pool habitat may be impacted, but his habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat based	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 88 percent of the vernal pool habitat and 38 percent of grassland habitat that are potential habitat for this species will be conserved.

This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for the species if a population is identified in the future.

Notes: This species is not known to occur within the MSCP area.

<i>Brodiaea orcuttii</i> Orcutt's brodiaea None	All major populations in the MSCP area, 88% of vernal pool habitat, 38% of grassland	12% of vernal pool habitat may be impacted, but this habitat is subject to no net loss of function and value and 404(b)1 guidelines.	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific (4 populations) and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because all of the major populations in the MSCP plan area (4 populations) will be conserved. This is Group A species in the County's proposed BMO².

Notes: Three major populations occur on Miramar military lands which are not part of the MSCP. Participating jurisdiction's guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: The San Vicente population is identified as a critical population in the County's Subarea Plan and must be 100 percent conserved. Area specific management directives must include specific measures to protect against detrimental edge effects.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Calamagrostis densa</i> Dense reed grass	91% of major populations	9% of major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 91% of major populations will be conserved.

Notes: Taxonomic reclassification has combined this taxon in a more common taxon, (*Calamagrostis koeleriodes*) which is widespread.

Conditions: Trail maintenance/placement to avoid human impacts must be addressed in area specific management directives. Enhancement opportunities using prescribed fire should be evaluated in the management plans. Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire.

<i>Calochortus dunnii</i> Dunn's mariposa lily */CR	100% of major populations	No major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of the major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for the species if a population is identified in the future.

Notes: Fifty-two percent of one of the three major populations occurs within a major amendment area in the Otay Mountain area. (Take authorization amendments will be subject to public review through CEWZ and NEPA processes and require approval by CDFG and USFWS.) This species occurs on gabbro and metavolcanic soils and 43+ percent of the gabbro soils in the MSCP plan area are within the MHPA.

<i>Caulanthus stenocarpus</i> Slender-pod jewelflower /CR	75% of major populations	25% of major populations	Site-specific preserve design and special measures/management	Monitoring Plan – Habitat Based and Incidental and Management/Directives.	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 3 or 4 (75 percent) of the major populations and 89 percent of occurrences will be conserved. The Wildcat Canyon, Poway/Sanrex, and Fortuna Mountain populations are identified as critical and will be 100 percent protected (San Diego County Subarea Plan requirement).

Note: This tax has been combined with the more widespread and common *Caulanthus heterophyllus* var. *heterophyllus*.

Conditions: Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Ceanothus cyaneus</i> Lakeside ceanothus none	75% of major populations	25% of major populations	Site-specific preserve design and special measures/management	Monitoring Plan – Habitat Based and Photo Plot	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSP because 3 of 4 (75 percent) of the major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific measures¹ for the species if a population is identified in the future. This is a Group A species in the County's proposed BMO².

Conditions: Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire.

<i>Ceanothus verrucosus</i> Wart-stemmed ceanothus none	67% of major populations, and 64% of known localities	33% of major populations, and 36% of known localities	Site-specific preserve design and special measures/management	Monitoring Plan – Habitat Based and Photo Plot and Management Plan/s Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 67 percent of the major populations will be conserved, and special management actions will increase populations. This is a Group B species in the County's proposed BMO ² .					
Notes: Additional important populations (30 percent of known populations) are found on military lands (Pt. Loma, Miramar) which are not part of the MSCP.					
Conditions: Revegetation efforts within appropriate habitats must include restoration of this species. Area specific management directives for the protected populations must include specific measures to increase populations. Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire. Any newly found populations should be evaluated for inclusion in the preserve strategy through acquisition, like exchange, etc.					
<i>Chorizanthe orcuttiana</i> Orcutt's spineflower	Unknown conservation level and therefore not covered by the plan.				NO
<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i> Salt marsh bird's-beak FE/CE	100% of major populations	No major populations	Site-specific preserve design and special measures/management	Monitoring Plan – Site Specific (3 populations)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of major populations within the MSCP plan area will be conserved.

Note: Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional protection. One population of this species also occurs on military lands (Naval Radar Receiving Facility) which are not part of the MSCP.

Conditions: Area specific management directives must 1) include measures to reduce threats and stabilize populations (e.g., relocation of footpaths, establishment of buffer areas, etc.), 2) address opportunities for reintroduction, and 3) include measures to enhance existing populations (e.g., protect and improve upland habitat for pollinators). There is a federal recovery plan for this species and management activities should to the extent possible help achieve the specified goals. Any newly found populations shall be evaluated for inclusion in the preserve strategy through acquisition, like exchange, etc.

<i>Cordylanthus orcuttianus</i> Orcutt's bird's-beak None	75% of major populations	25% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific (4 populations) and Management Plans/ Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 3 of 4 (75 percent) major populations will be conserved. A portion of the Otay River Valley population lies outside of the MHPA but will be subject to the County's Biological Mitigation Ordinance (80-100 percent conservation). The Otay Ranch population (southeast of Lower Otay Lake) is considered conserved subject to landowner and agency agreement.

Condition: AT the time permit amendments are proposed, strategies to provide protection for this species within the amendment area must be included. (Take authorization amendments are subject to public review through CEWX and NEPA processes and require approval by CDFG and USFWS.)

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i> Del Mar Mesa sand aster none	48% of major populations, 57% of known localities and 67% of southern maritime chaparral	52% of major populations, 43% of known localities and 33% of southern maritime chaparral	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 48 percent of major populations and 67 percent of its potential habitat (southern maritime chaparral) will be conserved. This is a Group A species in the County's proposed BMO².

Notes: This taxon has been merged with two other *Corethrogyne filaginifolia* varieties, and has been determined not to meet the taxonomic standards for listing.

Conditions: Area specific management directives for the protected populations must include specific measures to protect against detrimental edge effects to this species. Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire.

<i>Cupressus forbesii</i> Tecate cypress none	98% Tecate cypress forest	2% Tecate cypress forest	Preserve design/landscape level	Monitoring Plan – Habitat Based and Photo Plot	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 98 percent of major populations will be conserved, primarily on lands administered by BLM.

Conditions: Area specific management directives for the protected populations will include specific measures to maintain or increase populations. Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire.

<i>Dudleya blochmaniae</i> ssp. <i>brevifolia</i> Short-leaved dudleya PE/CE	100% of major populations	No major populations	Site-specific preserve design and special measures/management	Monitoring Plan –Site Specific (3 populations) and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional conservation measures¹ for the species.

Notes: The populations on Del Mar Mesa, Carmel Mountain, and Crestview Canyon are subject to considerable edge effects. The wildlife agencies will work with the University of California, San Diego to protect and manage the University of California property adjacent to Skeleton Canyon for this species.

Conditions: Area specific management directives must include 1) specific measures to protect against detrimental edge effects to this species, 2) species-specific monitoring and 3) maintenance of surrounding habitat for pollinators.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Dudleya variegata</i> Variegated dudleya none	56% of major populations, 75% of known localities	44% of major populations, 25% of known localities	Site-specific preserve design and special measures/management	Monitoring Plan – Site Specific (5 populations) and Management Plans/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 56 percent of major populations and 75 percent of known localities will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional conservation measures¹ for the species.

Conditions: Area specific management directives must include species-specific monitoring and specific measures to protect against detrimental edge effects to this species, including effects caused by recreational activities. Some populations now occur within a major amendment area (Otay Mountain) and at the time permit amendments are proposed, strategies to provide protection for this species within the amendment area must be included. (Proposed take authorization amendments will have public review through CEWX and NEPA processes and require approval by CDFG and USFWS.)

<i>Dudleya viscida</i> Sticky dudleya none	100% of major population	No major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of the only major population within the MSCP will be conserved.

Notes: Persistence of this species in San Diego County depends largely on conservation efforts in the MHCP and Camp Pendleton areas.

Conditions: Area specific management directives must address specific measures to protect against detrimental edge effects.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Ericameria palmeri</i> ssp. <i>palmeri</i> Palmer's ericameria None	66% of major populations	34% of major populations	Site-specific preserve design and special measures/management	Monitoring Plan – Habitat based and Photo Plot and Management Plans/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 66 percent of major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional conservation measures¹ for the species.

Notes: Impacts from these projects will be fully mitigated through avoidance, minimization and compensation. Two of the six major populations are subject to potential impacts from proposed road widening projects (Jamacha Blvd., Highways 54/94).

Eryngium aristulatum var. <i>parishii</i> San Diego button-celery FE/CE	82% of major populations, 88% of vernal pool habitat	18% of major populations may be impacted, but vernal pool habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives (wetlands)	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 82 percent of major populations and 8 percent of vernal pool habitat will be conserved.

Notes: Additional important populations are found on military lands (Miramar) which are not part of the MSCP. Four populations (Proctor Valley, Otay River Valley, Del Mar Mesa, Spring Canyon) are likely to be subject to edge effects. This species has been added to the City of San Diego's list of narrow endemic species. Vernal pools which become part of the National Wildlife Refuge would be managed for the recovery of this species.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects.

<i>Erysimum ammophilum</i> Coast wallflower none	92% of southern foredunes, 67% of southern maritime chaparral	8% of southern foredunes, 33% of southern maritime chaparral	Preserve design/landscape level	Monitoring Plan – Habitat Based and Incidental	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 92 percent of southern foredunes and 67 percent of southern maritime chaparral vegetation communities (that are potential habitat for this species) will be conserved.

Notes: Populations from San Diego County are now being treated as *Erysimum capitatum*, a common species of wallflower.

<i>Ferocactus viridescens</i> San Diego barrel cactus none	81% of major populations	19% of major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based and Photo Plot	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 81 percent of major populations will be conserved. This is a Group B species in the County's proposed BMO ² .					
Notes: This is an abundant species that will be protected at varying levels in several subareas: Carmel Mountain, 64 percent; East Elliot, 75 percent; Marron Valley, 90 percent; Mission Trails Regional Park, 94 percent; Otay Mesa, 70 percent; Otay River Valley, 100 percent; Sweetwater Reservoir, 100 percent; Sycamore Canyon-Fanita Ranch, 50 percent.					
Conditions: Area specific management directives must include measures to protect this species from edge effects, unauthorized collection, and include appropriate fire management/control practices to protect against a too frequent fire cycle.					
<i>Fremontodendron mexicanum</i> Mexican flannel bush PE/CR	Insufficient distribution data and unknown conservation level; therefore, the species is not covered by the plan.				NO
<i>Githopsis diffusa</i> ssp. <i>filicaulis</i> Mission Canyon bluecup none	Unknown conservation level and therefore not covered by the plan.				NO
<i>Hemizonia conjugens</i> Otay tarplant PE/CE	66% of major populations	34% of major populations	Site-specific preserve design and special measures/management	Monitoring Plan – Site Specific (5 populations) and Management Plans/Directives	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 66 percent of major populations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional conservation measures ¹ for the species.					
Conditions: MSCP coverage of this species requires avoidance of populations in the Otay River Valley through sensitive design and development of the active recreations areas as described in the Otay Ranch RMP and GDP. One of the seven major populations occurs within an amendment area (Proctor Valley). AT the time permit amendments are proposed, strategies to provide protection for this species within the amendment area must be include (proposed take authorization amendments will be subject to public review through CEWA and NEPA processes and take authorization amendments require approval by CDFG and USFWS). Area specific management directives must include specific measures for monitoring of populations and adaptive management of preserves (taking into consideration the extreme population fluctuations from year to year), and specific measures to protect against detrimental edge effects to this species.					
<i>Hemizonia floribunda</i> Tecate tarplant none	Unknown conservation levels and therefore not covered by the plan.				NO
<i>Lepechinia cardiophylla</i> Heart-leaved pitcher sage none	85% of major populations	15% of major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based and Photo Plot	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 85 percent of major populations will be conserved. The Iron Mountain population falls within a 100 percent conservation area. The other three major populations fall within the County's area of undetermined development status and will receive 80-100 percent conservation based on the County's proposed BMO² (Group A species).

Conditions: Area specific management directives must include: 1) specific measures to protect against detrimental edge effects; 2) specific measures to promote increase of populations; and 3) specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire (management measures to accomplish this may include prescribed fire).

<i>Lepechinia ganderi</i> Gander's pitcher sage none	All known locations	No known locations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of the known locations will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional conservation measures¹ for the species.

Conditions: Area specific management directives must include: 1) specific measures to protect against detrimental edge effects and uncontrolled access; 2) measures to promote the increase of populations; and 3) specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire (management measures to accomplish this may include prescribed fire). One of the five major populations occurs within a major amendment (Otay Mountain). At the time permit amendments are proposed, strategies to provide protection for this species within the amendment area must be included (proposed take authorization amendments are subject to public review through CEWX and NEPA processes and require approval by CDFG and USFWS).

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Lotus nuttallianus</i> Nuttall's lotus none	80-100% of major populations; 92% of southern foredune habitat	0-20% of major populations; 8% of southern foredune habitat	Preserve design/landscape level	Monitoring Plan – Site Specific (1 population)	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 80-100 percent of the major populations will be conserved and 92 percent of the habitat (southern foredunes) will be conserved.

Notes: Additional important populations are found on military lands (Imperial Beach, Silver Strand) which are not part of the MSCP . The USFWS is currently working with the Navy to provide protection for this species on Silver Strand.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects.

<i>Monardella hypoleuca</i> ssp. <i>lanata</i> Felt-leaved monardella none	89% of major populations	11% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 89 percent of major populations will be conserved. The Sequan Peak and Iron Mountain populations are identified as critical populations which will be 100 percent protected (San Diego County Subarea Plan). This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for this species. This is a Group A species in the County's proposed BMO².

Notes: Persistence of this species in San Diego County depends, in part, on conservation effects outside the MSCP area.

Conditions: Area specific management directives must also include measures to protect against detrimental edge effects and uncontrolled access.

<i>Monardella linoides</i> ssp. <i>viminea</i> Willow monardella PE/CE	100% of major populations	No major populations	Preserve design/landscape level	Monitoring Plan – Site Specific (2 populations) and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 100 percent of major populations will be conserved. Additional important populations are found on military lands (Miramar) which are not included as part of the MSCP. This species occurs in drainages and would receive protected based on Fish and Game Code 1600 agreements and federal wetlands permitting. This is a Group A species in the County's proposed BMO².

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects.

<i>Muilla clevelandii</i> San Diego goldenstar none	73% of major populations and 38% of grasslands	27% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific (4 populations)	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 8 of 11 major populations, 125 of 144 occurrences, and 38 percent of the grassland vegetation community will be conserved. The City of San Diego will avoid populations within its 25 percent encroachment area. The 4S Ranch population will be transplanted into an appropriate preserve area. This is a Group A species in the County's proposed BMO ² .					
Conditions: Area specific management directives must include monitoring of the transplanted population(s), and specific measures to protect against detrimental edge effects to this species.					
<i>Myosurus minimus</i> ssp. <i>apus</i> Little mouseltail none	The MSCP preserve does not include adequate habitat to conserve the species.				NO
<i>Navarretia fossalis</i> Prostrate navarretia PT/	63% of only major population, 88% of vernal pool habitat	37% of only major population, 12% of vernal pool habitat may be impacted, but this habitat is subject to no net loss of function and value and 404(b)1 guidelines	Site-specific preserve design and special measures/management	Area Specific Management Directives (wetlands)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 63 percent of the one major population and 88 percent of vernal pool habitat will be conserved. Federal wetland regulations will provide additional protection for vernal pool habitats. This is a Group A species in the County's proposed BMO ² .					
Notes: State and federal transportation agencies will need to avoid or adequately mitigate the impacts to this species from the extension of State Route 125. An additional small population is found on military lands (Miramar) and is not included as part of the MSCP. Vernal pools incorporated into the National Wildlife Refuge System would be managed for the recovery of this species.					
Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species, and must incorporate measures to conserve and maintain surrounding habitat for 1) pollinators and 2) as part of the hydrological system for the vernal pools.					
<i>Nolina interrata</i> Dehesa bear-grass PT/CE	90-100% of major populations	<10% of major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based and Photo Plot and Management Plans/Directives	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because: 100 percent of the McGinty Mountain population will be conserved; half of the Sequan Peak population is under protected ownership and 80-100 percent of the other half will be conserved; and 80-100 percent of the Dehesa Peak population will be conserved under the County's proposed BMO (Group A species)². This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for this species. Notes: Acquisition of the remaining portions of the population on Sequan Peak is important and efforts are underway by CDFG. Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects and management measures to maintain surrounding habitats for pollinators.					
<i>Opuntia parryi</i> var. <i>serpentina</i> Snake cholla none	75% of major populations and 67% of southern maritime chaparral	25% of major populations and 33% of southern maritime chaparral	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 75 percent of major populations and 67 percent of the southern maritime chaparral vegetation community will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures ¹ for this species.					
Notes: Additional important populations are found on military lands (Pt. Loma) which are not part of the MSCP.					
Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species, and promote translocation opportunity where appropriate. The Otay Ranch project GDP and RMP require protection of 80 percent of existing occurrences, and transplantation of any impacted occurrences to restored areas of comparable size.					
<i>Orcuttia californica</i> California Orcutt grass FE/CE	86% of only major population, 88% of vernal pool habitat	14% of only major population may be impacted, but vernal pool habitat is subject to no net loss of function of value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives (wetlands)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 86 percent of the one major population will be conserved. This species is on the MSCP's list of narrow endemics and therefore participating jurisdictions must specify in their Subarea Plans additional specific conservation measures¹ for this species.

Notes: A population outside of the MHPA (J-13N pool complex) is conserved with dedicated open space as mitigation for the Ramona K-mart. The USFWS will work with the border patrol to minimize impacts to this species. An additional small population is found on military lands (Miramar) and is not part of the MSCP.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species and measures to maintain surrounding habitats for pollinators.

<i>Pinus torreyana</i> Torrey pine none	100% of native population	No major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because the single naturally occurring population at Torrey Pines State Reserve will be conserved and appropriately managed.

<i>Pogogyne abramsii</i> San Diego mesa mint FE/CE	88% of vernal pool habitat	12% of vernal pool habitat may be impacted, but this habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 88 percent of its potential habitat (vernal pool habitat) will be conserved. Federal wetland regulations will provide additional protection for vernal pool habitats.					
Notes: The three major populations in the county occur on military lands (Miramar) which are not part of the MSCP. The City of San Diego has added this species to its narrow endemics list. The population at Montgomery Field was mistakenly omitted from the original mapping and now has been included. This population will be conserved and managed by the City of San Diego. Vernal pools included in the National Wildlife Refuge would be managed for recovery of this species.					
Conditions: Preserve management plan must include measures to: 1) protect against detrimental effects; 2) maintain surrounding habitat for pollinators; and 3) maintain pool watershed areas.					
<i>Pogogyne nudiuscula</i> Otay Mesa mint FE/CE	91% of the major population, 88% of vernal pool habitat	0% of the major population may be impacted, and this habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 91 percent of the one major population will be conserved, and federal wetland regulations will provide additional protection for vernal pool habitats.					
Notes: Twenty-six percent of the stockpan soils will be conserved, which will provide for enhancement opportunities for this species. The City of San Diego has added this species to their narrow endemics list. Vernal pools included in the National Wildlife Refuge would be managed for recovery of this species. The RMP for the Otay Ranch project includes protection for vernal pools with sensitive species.					
Conditions: Preserve management plan must include measures to: protect against detrimental edge effects; maintain surrounding habitat for pollinators; and maintain pool watershed areas.					
<i>Rosa minutifolia</i> Small-leaved rose /CE	Only known MSCP occurrence transplanted into preserve, propagation and restoration in appropriate habitat		Site-specific preserve design and special measures/management	Area Specific Management Directives (1 population)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERD

There is only one known occurrence of this species in the MSCP on Otay Mesa near Denberry Canyon. The occurrence may be a single clone, and some evidence suggests it may be a cultivar. This species will be covered by the MSCP because the only known occurrence will be conserved through the California Terraces project.

The following conditions for small-leaved rose conservation are required in the CDFG 2081 as part of the California Terraces project:

1. The rose population shall be salvaged, propagated, and transplanted to a new location that will support a healthy, reproducing population in perpetuity. This goal shall be achieved through a five year program that includes site improvement, propagation, transplantation, and monitoring. (a) The rose population shall be transplanted to a suitable open space preserve location on the Otay Mesa or to an alternative location subject to Department approval. Criteria in site selection shall include similar habitat, slope, aspect, soils, and hydrology as present on the existing rose site. (b) Propagation and transplanting of the rose population shall be implemented by a qualified native plant nursery/habitat restoration contractor (hereinafter Restoration Contractor), acceptable to the department, and under supervision of a qualified botanist. The rose propagation shall take place over a two year period. Rose plants to be extirpated shall be salvaged through: (i) seed collection; (ii) preparation of cuttings from rose canes; and (iii) salvage of underground parts and transplantation. (d) Transplantation of the rose clone shall commence during the period of October-December 1997. The remaining rose clone shall be cut into a minimum of 200 clumps. Each clump possessing roots and de-caned stems shall be planted on the HM lands as prescribed by a qualified botanist.
2. No removal of the rose population for a two (2) year period commencing from the date of planting propagated rose plants at the approved locations.
3. The progress of the rose mitigation effort shall be assessed through measurements and observations for a period of at least five (5) years following implementation of rose transplantation commencing in December 1997 and ending in July 2002. Factors to be monitored shall include growth, survival and/or establishment rate of the species, presence of introduced weeds, erosion, effects of herbivores, and any other factors important to the success of the mitigation effort. Community structure and species diversity at the mitigation site shall also be assessed. (a) Transplant success criteria over a five (5) year period shall include: (i) measurable annual growth on a minimum of 50 percent of the rose plants; and (ii) flowering of 50 percent of the rose plants during a minimum of one flowering season. In the event that success criteria are not met, the project applicant shall implement remedial measures subject to department approval.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Santureja chandleri</i> San Miguel savory none	80-100% of future identified occurrences	0-20%	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot	YES

DETAILS OF RATIONALE FOR IDENTIFY SPECIES AS COVERED

This species will be covered by the MSCP because it will be conserved at the 80+ percent level. The County will add this species to Group A or B of the County's proposed BMO².

Conditions: Area specific management directives must include specific management measures to address the autecology and natural history of the species and to reduce the risk of catastrophic fire. Management measures to accomplish this may include prescribed fire. This species will be conserved at the 80+ percent level.

<i>Senecio ganderi</i> Gander's butterweed */CR	90-100% of major populations	<10% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 90-100 percent of known major populations would be conserved. Half of the Sequan Peak population is under protected ownership and 80-100 percent of the other half will be conserved, and 90-100 percent of the McGinty Mountain populations will be conserved. The El Cajon Mountain (between El Capitan and San Vicente Reservoir) population is identified as critical which requires 100 percent protection based on the San Diego County Subarea Plan. Occurrences in the County's areas of undetermined development status will receive 80-100 percent protection under the County's proposed BMO² (Group A species).

Notes: This species is often associated with gabbro soils which will be conserved at the 43+ percent level. Acquisition of the remaining portions of the population on Sequan Peak is important and efforts are underway by CDFG.

Conditions: Area specific management directives must include: 1) specific measures to protect against detrimental edge effects to this species; and 2) measures to address the autecology and natural history of the species.

<i>Solanum tenuilobatum</i> Narrow-leaved nightshade none	90% of major populations	10% of major populations	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Photo Plot and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 90 percent of major populations will be conserved. Two smaller populations, Silverwood and Fernbrook, are identified as critical and will be 100 percent protected in the San Diego County Subarea Plan.

Notes: This species is now taxonomically included in *Solanum xanti*.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Tetracoccus dioicus</i> Parry's tetracoccus none	80-100% of major populations	0-20% of major populations	Preserve design/landscape level	Monitoring Plan – Habitat Based and Photo Plot	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 80-100 percent of major populations will be conserved.

Notes: Fourteen of 33 (43 percent) small populations are already under protected ownership. The Dehesa population is identified as critical and will be 100 percent protected in the San Diego County Subarea Plan. Occurrences in the County's areas of undetermined development status will receive 80-100 percent protection under the County's proposed BMO² (Group A species). Acquisition of the remaining portions of the population on Sequan Peak is important and efforts are underway by CDFG. This species is often associated with gabbro soils and 43+ percent of the gabbro soils are within the MHPA.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

ANIMALS

Invertebrates

<i>Euphydryas editha quino</i> Quino checkerspot butterfly PE/	Unknown conservation level and lack of assurances that plan will protect preferred habitat (mesa tops/grassland) and connection to known sources populations. Therefore, not covered by the plan.	NO
<i>Euphyes vestries harbisoni</i> Harbison's dun skipper none	Unknown conservation level and therefore not covered by the plan based on insufficient distribution and life history data.	NO

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Lycaena thornei</i> Hermes copper butterfly none	Unknown conservation level and therefore not covered by the plan based on insufficient distribution and life history data.				NO
<i>Mitoura thornei</i> Thorne's hairstreak butterfly none	98% of Tecate cypress forest (larval host plant)	2% of Tecate cypress forest	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 98 percent of the major populations of its larval host plant, Tecate cypress, will be conserved. Most of the Tecate cypress forest occurs on BLM lands.

Conditions: Area specific management directives must manage for the host species (Tecate cypress). Management measures to accomplish this may include prescribed fire.

<i>Panoquina errans</i> Salt marsh skipper none	93% of salt marsh habitat (1,700± acres)	7% of salt marsh habitat (120± acres) may be impacted, but is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent of its potential habitat will be conserved.

Conditions: Area specific management directives must include measures to: control exotic weeds and invertebrate predators (where appropriate), and control access to saltmarsh habitat.

<i>Branchinecta sandiegoensis</i> San Diego fairy shrimp PE/	88% of vernal pool habitat	12% of vernal pool habitat may be impacted, but this habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Area Specific Management Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 88 percent of its potential habitat (vernal pool habitat) will be conserved. Federal and local wetland regulations will provide additional protection for vernal pool habitats. The Otay Ranch project RMP and GDP require protection for vernal pools with sensitive species.

Notes: Additional important habitat for this species occurs on military lands (Miramar) and is not part of the MSCP.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Streptocephalus woottonii</i> Riverside fairy shrimp FE/	88% of vernal pool habitat	12% of vernal pool habitat may be impacted, but this habitat is subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Area Specific Management Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 88 percent of its potential habitat (vernal pool habitat) will be conserved. Federal and local wetland regulations will provide additional protection for vernal pool habitats. The Otay Ranch project RMP and GDP require protection for vernal pools with sensitive species.

Notes: Additional important habitat for this species occurs on military lands (Miramar) and is not part of the MSCP.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

Reptiles and Amphibians

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Bufo microscaphus californicus</i> Arroyo southwestern toad FE/SSC	All known locations (Cottonwood Creek in Marron Valley, San Vicente Creek and Santa Ysabel Creek in San Pasqual Valley, Sweetwater River, and Otay River), 78% riparian wetland areas in suitable habitat	Upland habitats adjacent to riparian wetlands (potential habitat) in undetermined status areas in Sloan Canyon – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Site Specific (7 locations) and Management Plans/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because the MHPA preserves all known locations, and 90-95 percent of the upland habitats within the Marron Valley area will be conserved. Impacts to upland habitats within 1 km of riparian corridors within the MHPA will be minimized during project review by CDFG and USFWS. Take authorization holders must minimize impacts to upland habitats which provide habitat for this species which are: within the MHPA and are within 1 km of riparian habitat which supports or is likely to support Arroyo toad. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting no net loss of wetlands.

Notes: Important habitat areas include the San Diego River below El Capitan Reservoir, San Vicente Creek between Sweetwater Reservoir and Loveland Reservoir, Dulzura Creek, San Pasqual Valley from Lake Hodges to Boden Canyon, Otay River, Jamul Creek, Cedar Creek and Sycamore Creek.

Conditions: Area specific management directives must address the maintenance of Arroyo toad through control of non-native predators, protection and maintenance of sufficient suitable low gradient sandy stream habitat (including appropriate water quality) to meet breeding requirements, and preservation of sheltering and foraging habitat within 1 km of occupied breeding habitat within preserved lands. Area specific management directives must include measures to control human impacts to the species within the preserve (e.g., public education, patrol, etc.).

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Rana aurora draytoni</i> California red0-legged frog FT/SSC	72% of riparian habitats and fresh water marsh (9,500± acres	28% of riparian habitats and fresh water marsh (3,800± acres) -) wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species is believed to be extirpated from the County. Although unlikely, additional survey effort may detect red-legged frog. Therefore, this species will be covered by the MSCP because 70 percent of its potential habitat will be conserved. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must provide for management of any new discovered populations within the preserve.

<i>Clemmys marmorata</i> <i>pallida</i> Southwestern pond turtle /SSC	72% of riparian habitats and fresh water marsh (9,501 acres)	28% of riparian habitats and fresh water marsh (3,800± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 72 percent of its potential habitat will be conserved. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.					
Conditions: Maintain and manage a 1500 foot area around known locations within preserve lands for the species. Within this impact avoidance area, human impacts will be minimized, non-native species detrimental to pond turtles controlled/removed and habitat restoration/enhancement measures implemented.					
<i>Cnemidophorus hyperythrus beldingi</i> Orange-throated whiptail /SSC	59% of potential habitat (129,600± acres) – 38% of known point occurrences	41% of potential habitat (89,800± acres) – 38% of known point occurrences	Preserve design/landscape level	Monitoring Plan – Site Specific (pit traps at 12 locations)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 59 percent of its potential habitat and 62 percent of known point occurrences will be conserved. Habitat linkages between large blocks of protected lands are conserved in a functional manner. Monitoring of populations and adaptive management of preserves will occur as a result of plan implementation.

Notes: This species also occurs extensively on military lands.

Conditions: Area specific management directives must address edge effects.

<i>Phrynosoma coronatum blainvillei</i> San Diego horned lizard /SSC	60% of potential habitat (132,000± acres) – 64% of coastal sage scrub, 54% of chaparral, 44% of coastal sage/chaparral, 80% of riparian scrub – 63% of known point occurrences	40% of potential habitat (89,700± acres) – 37% of known point occurrences	Preserve design/landscape level	Monitoring Plan – Site Specific (pit traps at 12 locations)	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 60 percent of its potential habitat and 63 percent of known point occurrences will be conserved. Habitat linkages between large blocks of protected lands are conserved in a functional manner. Monitoring of populations and adaptive management of preserves will occur as a result of plan implementation.

Conditions: Area specific management directives must include specific measures to maintain native ant species, discourage the Argentine ant, and protect against detrimental edge effects to this species.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
Birds					
<i>Pelecanus occidentalis californicus</i> California brown pelican FE/CE	91% of roosting and foraging habitat (2,800± acres) – 93% of southern coastal saltmarsh, 88% of natural flood channel, 90-95% of beach outside of intensively used recreational beaches	9% of roosting and foraging habitat (270± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 91 percent of roosting and foraging habitat within the plan area will be conserved. No new development of beaches is authorized which will result in 90-95 percent protection of beach habitat that is outside of intensively used beach areas.

Notes: Most of the important roosting and foraging habitat occurs on military lands and waters under Port Authority jurisdiction which are not included as part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. This species is a common to very common non-breeding visitor which uses mud flats, piers, jetties, etc., to roost and forages primarily in coastal ocean waters and San Diego.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Egretta rufescens</i> Reddish egret none	92% of potential habitat (2,700± acres) – 93% of southern coastal saltmarsh, 99% of salt pan, 88% of natural flood channel	8% of potential habitat (230± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 90 percent of its potential habitat will be conserved.

Notes: Additional important habitat occurs in waters under Port Authority and military jurisdiction which are not included as part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. This species forages in shallow lagoons, mud flats, tidal channels and salt marsh. This species is a rare visitor in fall and winter and a casual visitor in spring and summer, but does not nest in San Diego County.

<i>Plegadis chihi</i> white-faced ibis */SSC	78% of potential habitat (1,200± acres) – 68% of freshwater marsh, 88% of natural flood channel, additionally 1,800± acres of potentially habitat agricultural land will be conserved	26% of potential habitat (300± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 78 percent of its potential habitat will be conserved. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. The preserve management plan for the City of San Diego cornerstone lands must include protection and management of potential nesting habitat at Lake Hodges.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

<i>Branta canadensis</i> Canada goose none	8,200± acres of potencial habitat	1,100± acres of potential habitat – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

Although not considered sensitive, this species has aesthetic and intrinsic values, and is a regulated game species thereby being an important species to protect. This species will be covered by the MSCP because 8,200± acres of its potential habitat will be conserved, including open water areas for loafing. Participating jurisdiction's guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Haliaeetus leucocephalus</i> Bald eagle FT/CE	89% of potential foraging habitat (wetlands) (5,719± acres), 68% of freshwater marsh, 92% of open water. In addition, foraging opportunities (carrion, etc.) on 100,000+ acres will be conserved.	11% of potential foraging habitat (wetlands) (692± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 89 percent of its potential foraging habitat (open water and freshwater marsh) will be conserved. Bald eagles are a rare winter visitor which require perching and roosting sites adjacent to open water and marshes. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

<i>Circus cyaneus</i> Northern harrier /SSC	42% of potential nesting habitat (12,000± acres) – 93% of saltmarsh, 68% of freshwater marsh and 38% of grasslands, - 85,000± acres of potential foraging habitat	48% of potential nesting habitat (16,300± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Management Plans/Directives (nest sites)	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species is an uncommon migrant and winter visitor, and rare summer resident/breeder. This species will be covered by the MSCP because 42 percent of its potential nesting habitat, and 85,000± acres of its potential foraging habitat will be conserved. The plan will not adversely affect the species' long-term survival.

Notes: Harriers tolerate patchiness in their habitat, exhibit nest area fidelity, and forage within four miles of their nests. Additional conservation of grassland habitats should be a priority and one of the primary factors in the design of preserves in the major amendment areas. Participating jurisdiction's guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. Active nesting areas include:

Tijuana River Valley – The City of San Diego Subarea Plan includes conservation of two known nesting sites in the Tijuana River Valley, and maintenance of some agricultural lands (available for foraging harriers) within the Tijuana River Valley Regional Park. The Tijuana National Estuarine Sanctuary will continue to enhance marshlands and manage for nesting harriers. Some existing grasslands and agricultural lands at the outer limits of the foraging distance for nesting harriers will be developed. With the addition of over 4,000 acres of agricultural and disturbed lands to the City of San Diego's preserve (in comparison with the March 1995 preserve design), adequate foraging areas within this area are conserved. Food production for harriers on preserve lands can be enhanced.

South San Diego Bay/Sweetwater Marsh – The City of San Diego Subarea Plan includes conservation of one known nesting site in the Sweetwater Marsh area. All nesting and foraging habitat within four miles of the known nesting site will be preserved. Upland habitat enhancement exist at the D Street fill area.

Proctor Valley – Proctor Valley includes an historical nesting location (1970s). Over 80 percent of the Proctor Valley area will be conserved with most of the development occurring in the upper portion of the valley, away from the more likely nesting areas.

Conditions: Area specific management directives must: manage agricultural and disturbed lands (which become part of the preserve) within four miles of nesting habitat to provide foraging habitat; include an impact avoidance area (900 foot or maximum possible within the preserve) around active nests; and include measures of maintaining winter foraging habitat in preserve areas in Proctor Valley, around Sweetwater Reservoir, San Miguel Ranch, Otay Ranch east of Wueste Road, Lake Hodges, and San Pasqual Valley. The preserve management coordination group shall coordinate efforts to manage for wintering northern harriers' foraging habitat within the MSCP preserves.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Accipiter cooperii</i> Cooper's hawk /SSC	59% of potential foraging habitat (133,400± acres) (47% of oak woodland, 58% of oak riparian, 64% of coastal sage scrub, 54% of chaparral, 44% of coastal sage scrub/chaparral – 57% of known localities) and 52% (5,705± acres) of potential nesting habitat (58% of oak riparian and 47% of oak woodland)	41% of potential foraging (93,900± acres) and 48% of potential nesting habitat (5,200± acres)	Preserve design/landscape level with the site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Management Plans/Directives (site specific nest territories)	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 59 percent of potential foraging and 52 percent of potential nesting habitat and 92 percent of known occurrences will be conserved.

Conditions: In the design of future projects within the Metro-Lakeside-Jamul segment, design of preserve areas shall conserve patches of oak woodland and oak riparian forest of adequate size for nesting and foraging habitat. Area specific management directives must include 300-foot impact avoidance areas around the active nests, and minimization of disturbance in oak woodlands and oak riparian forests.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Buteo swainsoni</i> Swainson's hawk /CT	22% of foraging habitat (11,600± acres) – 38% of grassland, 6% of agricultural fields	78% of foraging habitat (42,000± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based (10 grassland locations)	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species is an extremely rare visitor during migration which forages in grasslands and agricultural fields. This species will be covered by the MSCP because more than 11,000 acres of potential foraging habitat will be conserved.

Notes: The plan will not adversely affect the species' long-term survival. Additional conservation of grassland habitats should be a priority and one of the primary factors in the design of preserves in the major amendment areas. This species is a rare migrant through the area.

<i>Buteo regalis</i> Ferruginous hawk */SSC	22% of foraging habitat (11,600± acres) – 38% of grassland, 6% of agricultural fields	78% of foraging habitat (42,000± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based (10 grassland locations)	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered because 11,600± acres of potential foraging habitat will be conserved. This species is an uncommon winter visitor which forages in grasslands and agricultural fields.

Notes: The plan will not adversely affect the species' long-term survival. Additional conservation of grassland habitats should be a priority and one of the primary factors in the design of preserves in the major amendment areas. This species is not known to nest within the MSCP study area.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Aquila chrysaetos</i> Golden eagle BEPA/SSC	53% of potential foraging/nesting habitat (coastal sage scrub, chaparral, grassland and oak woodland) 139,000± acres) – large blocks of habitat conserved in the eastern portion of the plan area where active nesting territories exist. Of the 11 active nesting territories (based on information from the Golden Eagle Survey Project, San Diego) which are fully or partially within the MSCP plan area, 7 nesting territories should remain viable.	Viability of 4 of the 11 active nesting territories (partially or fully within the plan area)	Preserve design/landscape level with the site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Management Plans/Directives (site specific nest territories)	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 53 percent of potential foraging and nesting habitat will be conserved. Local populations are not critical to, and the plan will not adversely affect the species' long-term survival.

Notes: Fourteen active nesting territories occur primarily outside of the MSCP area (east and northeast of the plan area). Plans developed for these areas should include measures to conserve adequate habitat to maintain their viability. The following is an analysis of the plan's effects on each nesting territory.

1. Rancho San Diego – development under the plan will result in <10 percent loss of habitat in the nesting territory, nesting territory should remain viable;
2. East Otay Mountain – development under the plan will result in <5 percent loss of habitat in the nesting territory, nesting territory should remain viable;
3. Sequan Peak – between 30 percent and 40 percent of the habitat in the nesting territory could be developed, the nesting territory may not remain viable, but the steepness of the areas which could be developed may preclude enough development to keep the territory viable;
4. Loveland Reservoir – development under the plan will result in >20 percent loss of habitat in the nesting territory, nesting territory should remain viable;
5. Lake Jennings – between 40 percent and 60 percent of the habitat in the nesting territory could be developed under the plan, the nesting territory may not remain viable;
6. El Capitan territory – development under the plan will result in <15 percent loss of habitat within the nesting territory, the territory should remain viable;
7. San Vicente Reservoir – development under the plan will result in <30 percent of the high quality golden eagle habitat being developed, although low quality habitat (steep chaparral) could be developed resulting in greater habitat loss within the nesting territory (although high density development is not likely to occur because of the steep slopes), the nesting territory is may not be viable;
- 8 and 9. San Pasqual (two nesting territories) – development under the plan will result in <20 percent loss of habitat in the nesting territory and both nesting territories should remain viable;
10. Santee – development under the plan could result in 30 percent-40 percent loss of habitat in the nesting territory and the nesting territory may not remain viable, although a significant amount of foraging habitat (Miramar and Mission Trails) occurs just outside of the territory and within normal foraging distances; and
11. Lake Hodges – development under the plan will result in <20 percent loss of habitat in the nesting territory, the nesting territory should remain viable.

Conditions: Area specific management directives for areas with nest sites must include measures to avoid human disturbance while the nest is active, including establishing a 4,000 foot disturbance avoidance area within preserve lands. Area specific management directives must also include monitoring of nest sites to determine use/success.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Falco peregrinus</i> <i>anatum</i> American peregrine falcon FE/CE	61% of historic nesting sites – 58% of foraging habitat (89,400± acres) – 93% southern coastal saltmarsh, 99% of saltpan, 68% of freshwater marsh, 91% of open water, 88% of natural flood channel, 64% of coastal sage scrub, 38% of grassland	39% of foraging habitat (57,000± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because more than 89,000 acres of potential foraging habitat will be conserved.

Notes: This species has very low population numbers in the County, being primarily a rare fall and winter visitor. All three nest sites occur outside of the MHPA: one on Coronado Bridge, one on a crane in Port Authority jurisdiction, and one on Pt. Loma federal lands. Participating jurisdictions; guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

<i>Rallus longirostris</i> <i>levipes</i> Light-footed clapper rail FE/CE	93% of potential habitat (1,700± acres of southern coastal saltmarsh)	7% of potential habitat (120± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Site-specific preserve design and special measures/management	Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED					
This species will be covered by the MSCP because 93 percent of its habitat will be conserved.					
Notes: Additional important habitat is found on military lands (Silver Strand) which are not included as part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.					
Conditions: Area specific management directives must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species.					
<i>Charadrius alexandrinus nivosus</i> Western snowy plover FT/SSC	93% of potential habitat (650± acres) 99% of saltpan, 90- 95% of beach outside of intensively used recreational beaches	7% of potential habitat (467% of potential habitat (46± acres) –wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent of its potential habitat will be conserved. All breeding activity of western snowy plovers in the County occurs in saltpan habitat. No new development of beaches is authorized which will result in 90-95 percent conservation of beach habitat that is outside of intensively used beach areas.

Notes: Additional important habitat is found on military lands (Silver Strand) which are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must include protection of nesting sites from human disturbance during the reproductive season, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of levees/dikes is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies.

<i>Charadrius montanus</i> Mountain plover C/SSC	22% of potential foraging habitat (11,600± acres) – 38% of grassland, 6% of agricultural fields	78% of potential foraging habitat (41,100± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because over 11,000 acres of potential foraging habitat will be conserved. The plan will not adversely affect the species' long-term survival.

Notes: This species is an uncommon winter visitor (primarily in the Tijuana River Valley) which forages in grasslands and agricultural fields. The MSCP conservation requirement for the Tijuana River Valley area is primarily 94 percent with a small area identified as 75 percent.

Conditions: Management Plans for the Tijuana River Valley should specifically address the habitat requirements for this species.

<i>Numenius americanus</i> Long-billed curlew */SSC	24% of potential foraging habitat (13,500± acres) – 93% of southern coastal saltmarsh, 99% of salt pan, 38% of grassland, 6% of agricultural fields	77% of potential foraging habitat (42,800± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species is a fairly common migrant and winter visitor.

Notes: This species will be covered by the MSCP because more than 13,500 acres of potential foraging habitat will be conserved. The plan will not adversely affect the species' long-term survival. Additional conservation of grassland habitats should be a priority and one of the primary factors in the design of preserves in the major amendment areas. Additional habitat occurs on military lands (Silver Strand, San Diego Bay) which are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Sterna elegans</i> Elegant tern */SSC	93% of potential habitat (650± acres) 99% of saltpan, 90- 95% of beach outside of intensively used recreational beaches	10% of potential habitat (46± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Area Specific Management Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent of its potential habitat will be conserved.

Notes: All breeding activity of elegant terns in the County occurs in saltpan habitat. No new development of beaches is authorized which will result in 90-95 percent protection of beach habitat that is outside of intensively used beach areas. Additional important foraging habitat (bay waters) is under the jurisdiction of the Port Authority and military, and are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must include protection of nesting sites from human disturbance during reproductive season, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of levees/dikes is not authorized except as specifically approved on a case-by-case basis by the wildlife agencies.

<i>Sterna antillarum</i> <i>browni</i> California least tern FE/CE	93% of potential habitat (650± acres) 99% of saltpan, 90- 90% of beach outside of intensively used recreational beaches	7% of potential habitat (46± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Area Specific Management Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent of its potential habitat will be conserved.

Notes: No new development of beaches is authorized which will result in 90-95 percent conservation of beach habitat that is outside of intensively used beach areas. Additional important breeding habitat occurs on military lands (North Beach, Silver Strand, Naval Training Center) and are not part of the MSCP. Additional important foraging habitat (bay waters) is under the jurisdiction of the Port Authority and the military, and are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must include protection of nesting sites from human disturbance during reproductive season, predator control, and specific measures to protect against detrimental edge effects to this species. Incidental take (during the breeding season) associated with maintenance/removal of dikes/levees, beach maintenance/enhancement is not authorized except as specifically approved on a case-by-caser basis by the wildlife agencies.

<i>Speotyto cunicularia</i> <i>hypugaea</i> Burrowing owl */SSC	4 known locations (Spring Canyon, northeast of Brown Field, Lake Hodges), 8 known locations within major amendment area (south County segment), 4,000± acres of known habitat	8 known locations (Otay Ranch, San Pasqual Valley and South County at border), 5,000± of known habitat	Site-specific preserve design and special measures/management	Monitoring Plan – (10 grassland locations) and Area Specific Management Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 5,770± acres of potential and 4,000± acres of known suitable habitat (grassland vegetation community) will be conserved, including portions of Spring Canyon, San Pasqual Valley, Lake Hodges, Otay Mesa northeast of Brown Field, Otay Ranch, Otay River Valley, and Future Urbanizing Area 4.

Notes: Habitat enhancement opportunities for the species occur in the Spring Canyon, San Pasqual Valley, Lake Hodges, Otay Mesa northeast of Brown Field, Otay Ranch, Otay River Valley and Future Urbanizing Area 4. The wildlife agencies will enhance and manage lands within their ownership to allow for relocation of burrowing owls, particularly in conjunction with burrowing owl removal programs in areas where their presence conflicts with nesting of California least terns. The wildlife agencies will attempt to achieve additional conservation of occupied burrowing owl habitat or habitat suitable for restoration using state and federal acquisition resources. Persistence of the species in San Diego County is also dependent on adequate conservation of known concentrations in the San Maria Valley in the vicinity of Ramona.

Conditions: During the environmental analysis of proposed projects, burrowing owl surveys (using appropriate protocols) must be conducted in suitable habitat to determine if this species is present and the location of active burrows. If burrowing owls are detected, the following mitigation measures must be implemented: within the MSHPA, impacts must be avoided; outside of the MHPA, impacts to the species must be avoided to the maximum extent practicable; any impacted individuals must be relocated out of the impact area using passive or active methodologies approved by the wildlife agencies; mitigation for impacts to occupied habitat (at the Subarea Plan specified ratio) must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management and enhancement of burrowing owl nesting and foraging requirements.

Management plans/directives must include: enhancement of known, historical and potential burrowing owl habitat; and management for ground squirrels (the primary excavator of burrowing owl burrows). Enhancement measures may include creation of artificial burrows and vegetation management to enhance foraging habitat. Management plans must also include: monitoring of burrowing owl nest sites to determine use and nesting success; predator control; establishing a 300 foot-wide impact avoidance area (within the preserve) around occupied burrows.

Eight known burrowing owl location occur within major amendment areas of the South County Segment of the County Subarea Plan and the conservation of occupied burrowing owl habitat must be one of the primary factors preserve design during the permit amendment process.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Empidonax traillii</i> <i>extimus</i> Southwestern willow flycatcher FE/CE	76% of potential habitat (4,900± acres) – 90% of riparian woodland, 80% of riparian scrub – 88% of known localities	24% of potential habitat (1,400± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Area – Specific Management Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 4,900± acres (76 percent) of potential habitat will be conserved.

Conditions: Jurisdictions must require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be impacted and incorporate mitigation measures consistent with the 404(b)1 guidelines into the project. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. For new developments adjacent to preserve areas that create conditions attractive to brown-headed cowbirds, jurisdictions must require monitoring and control of cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 1 and May 1 (i.e., outside of the nesting period).

<i>Camphylorhynchus</i> <i>brunneicapillus couesi</i> Coastal cactus wren */SSC	60% of maritime succulent scrub habitat in large contiguous blocks (850)± acres)	40% of maritime succulent scrub habitat in small isolated blocks (580± acres)	Site-specific preserve design and special measures/management	Monitoring Plan – Site Specific (31 locations) and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species is covered because four of five major populations are conserved, including populations at Lake Hodges/San Pasqual Valley, Lake Jennings, South Sweetwater Reservoir/San Miguel Ranch and Salt Creek/Otay Mesa and 60 percent (850± acres) will be conserved allowing for expansion of the populations with management.

Notes: This species also uses other habitat types (coastal sage scrub and chaparral) containing cactus patches. Small clusters of birds at Black Mountain and Spring Valley will also be conserved. Conservation of the Salt Creek population is critical to the persistence of the species in San Diego County and it would only be conserved under the city of Chula Vista's "Modified GDP B" alternative. The existing distribution of cactus wrens in the MSCP plan area has been greatly reduced and restoration of suitable cactus wren habitat and its management are important components of the MSCP plan. Significant opportunities for restoration within the MHPA occur on Otay Ranch, Spring Canyon (and adjacent areas), Dennery Canyon, San Miguel Ranch, Lake Hodges/San Pasqual Valley, Otay River Valley and Santee/Lake Jennings. The participating jurisdictions should seek OHV funds for restoration since much of these areas have been heavily impacted by OHVs. The City of San Diego has already acquired habitat in Spring Canyon as mitigation. The City of San Diego and the wildlife agencies have agreed to make restoration maritime succulent scrub in Spring Canyon a high priority. The USFWS will also make restoration of maritime succulent scrub a high priority on any lands it acquires in Spring Canyon.

Conditions: The restoration of maritime succulent scrub habitat as specified in the Otay Ranch RMP and GDP must occur at the specified 1:1 ratio. Area specific management directives must include restoration of maritime succulent scrub habitat, including propagation of cactus patches, active/adaptive management of cactus wren habitat, monitoring of populations within preserves and specific measures to reduce or eliminate detrimental edge effects. No clearing of occupied habitat may occur from the period February 15 through August 15.

<i>Poliioptila californica californica</i> California gnatcatcher FT/SSC	73,300± acres of coastal sage scrub and interdigitated habitats in an interconnected network of preserves	67,300± acres of coastal sage scrub and interdigitated habitats	Preserve design/landscape level	Area Specific Management Directives (31 locations)	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because: over 73,300 acres of existing and potential gnatcatcher habitat will be conserved and linked together; over 81 percent of the core areas where the species occurs (Otay, San Miguel, Mission Trails, Santee, Kearny Mesa, Poway, San Pasqual and Lake Hodges) will be conserved; and 65 percent (1,819 of 2,814) of the known locations will be conserved.

Notes: Sixty-eight percent (57,874 acres) of habitat supporting core gnatcatcher populations and 70 percent (30,273 acres) of very high value and 62 percent high value (4,609 acres) gnatcatcher coastal sage scrub habitat would be conserved. Critical habitat linkages between core areas conserved in a function manner with a minimum of 75 percent of the habitat within identified linkages conserved. Populations of this species also occur on military lands which are not part of the MSCP.

Conditions: Area specific management directives must include measures to reduce edge effects and minimize disturbance during the nesting period, fire protection measures to reduce the potential for habitat degradation due to unplanned fire, and management measures to maintain or improve habitat quality including vegetation structure. No cleaning of occupied habitat within the cities' MHPAs and within the County's Biological Resource Core Areas may occur between March 1 and August 15.

<i>Sialia mexicana</i> Western bluebird none	59% of potential habitat (15,500± acres) – 57% of oak riparian forest, 47% of oak woodland, 34% of grassland	41% of potential habitat (12,100± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because over 15,000 acres of habitat will be conserved.

Notes: Persistence of this species in San Diego County depends largely on conservation of existing large populations on public lands east of the plan area.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Vireo bellii pusillus</i> Least Bell's vireo FE/CE	81% of potential habitat (1,700± acres) – 93% of riparian woodland, 58% of oak riparian forest – 82-100% of major populations	19% of potential habitat (400± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level with site-specific consideration(s)/management	Monitoring Plan – Habitat Based and Management Plans/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 1,700± acres (81 percent) of potential habitat will be conserved.

Conditions: Jurisdictions will require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be impacted and incorporate mitigation measures consistent with the 404(b)1 guidelines into the project. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. Jurisdictions must require new developments adjacent to preserve areas that create conditions attractive to brown-headed cowbirds to monitor and control cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting period).

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Aimophila ruficeps</i> <i>canescens</i> California rufous- crowned sparrow */SSC	61% of potential habitat (73,600± acres) – 64% of coastal sage scrub, 60% of maritime succulent scrub, 44% of coastal sage/chaparral – 71% of mapped localities	39% of potential habitat (46,600± acres) – 29% of mapped localities	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 61 percent (73,600± acres) of potential habitat (including 71 percent of mapped localities) will be conserved.

Notes: This species is tolerant of edge effects, small habitat patches, low shrub volume, and short-term habitat disturbance.

Conditions: Area specific management directives must include maintenance of dynamic processes, such as fire, to perpetuate some open phases of coastal sage scrub with herbaceous components.

<i>Passerculus</i> <i>sandwichensis beldingi</i> Belding's savannah sparrow */CE	93% of potential habitat (1,700± acres of southern coastal saltmarsh) – 71% of mapped localities	7% of potential habitat (120± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based and Management Plans/Directives	YES
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SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent (1,700± acres) of potential habitat (including 71 percent of mapped localities) will be conserved and the remaining acres (120±) are subject to no net loss of value and function.

Notes: Additional important habitat is found on military lands (Silver Strand, North Island, etc.) which are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

<i>Passerculus sandwichensis rostratus</i> Large-billed savannah sparrow */SSC	93% of potential habitat (1,700± acres of southern coastal saltmarsh) – 50% of mapped localities	7% of potential habitat (120± acres) – wetlands are subject to no net loss of function and value and 404(b)1 guidelines	Preserve design/landscape level	Monitoring Plan – Habitat Based and Management Plans/Directives	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 93 percent (1,700± acres) of potential habitat (including 50 percent of mapped localities) will be conserved and the remaining acres (120±) are subject to no net loss of value and function.

Notes: Additional important habitat is found on military lands (Silver Strand, North Island, etc.) which are not part of the MSCP. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Area specific management directives must include specific measures to protect against detrimental edge effects to this species.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Ammodramus savannarum</i> Grasshopper sparrow none	This species will not be covered by the MSCP because insufficient information is available to determine if adequate habitat is conserved.				NO
<i>Agelaius tricolor</i> Tricolored blackbird */SSC	77% of breeding habitat (4,800± acres) – 61% of freshwater marsh, 80% of riparian scrub – 59% of known localities	23% of breeding habitat (1,400± acres)	Preserve design/landscape level	Management Plans/Directives	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 77 percent of potential habitat (including 59 percent of mapped localities) will be conserved. Breeding colonies move from season to season, and with a goal of no net loss of wetlands, most of the suitable breeding sites will continue to be available. This species forages in grasslands and agricultural fields near its breeding habitat. Foraging habitat near the known nesting colonies will be conserved at 70-100 percent. Additionally, foraging opportunities will continue to be provided and created in turfed areas such as golf courses and cemeteries. Jurisdictions will require surveys during the CEQA review process in suitable breeding habitat proposed to be impacted. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands.

Conditions: Project approvals must require avoidance of active nesting areas during the breeding season. Area specific management directives must include measures to avoid impacts to breeding colonies, and specific measures to protect against detrimental edge effects to this species.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Plecotus townsendii</i> Townsend's western big-eared bat */SSC	Unknown/Insufficient data on distribution and life history.				NO
<i>Eumops perotis californicus</i> California mastiff bat */SSC	Unknown/Insufficient data on distribution and life history.				
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse FE/SSC	Unknown/Only 3 to 4 known populations in Southern California. Insufficient data on distribution and life history.				NO
<i>Taxidea taxus</i> American badger /SSC	58% of potential habitat (82,500± acres) – 38% of grassland, 64% of coastal sage scrub, 44% of coastal sage/chaparral	42% of potential habitat (58,300± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based	YES

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 82,000± acres (58 percent) of its potential habitat will be conserved.

Notes: This species has a wide range, and the plan will not adversely affect the species' long-term survival. Additional conservation of grassland habitats should be a priority and one of the primary factors in the design of preserves in the major amendment areas.

Conditions: Area specific management directives must include measures to avoid direct human impacts to this species if it is present or likely to be present.

<i>Felis concolor</i> Mountain lion/protected	81% of core areas 5, 6, 7, 8, 9, 11, and 12 (105,000± acres) – connected by linkages C, D, N	19% of core areas (24,000± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based and Corridor Sites	YES
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DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 81 percent of the core areas (105,000± acres) which support its habitat will be conserved.

Notes: Although not considered sensitive, this species has aesthetic and intrinsic values, thereby being an important species to protect. This species has a wide range, and the plan will not adversely affect the species' long-term survival. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. An extensive monitoring program will also be implemented by the wildlife agencies to detect unanticipated changes in ecosystem function and allow for adaptive management of the preserve system. Specific design criteria for linkages, road crossings/undercrossings are included in Subarea Plans.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

Scientific Name Common Name Status	Conserved ³ (Based on the MSCP Plan)	Potentially Impacted/Developed (Based on the MSCP Plan)	General Basis for Analysis of Coverage	Monitoring Method(s) (Monitoring Plan and/or Management Plans/Directives)	Meets State and Federal Authorization Standards
<i>Odocoileus hemionus</i> <i>fuliginata</i> Southern mule deer none	81% of core areas 5, 6, 7, 8, 9, 11, and 12 (105,000± acres) – connected by linkages C, D, N	19% of core areas (24,000± acres)	Preserve design/landscape level	Monitoring Plan – Habitat Based and Corridor Sites	YES

DETAILS OF RATIONALE FOR IDENTIFYING SPECIES AS COVERED

This species will be covered by the MSCP because 81 percent of the core areas (105,000± acres) which support its habitat will be conserved.

Notes: Although not considered sensitive, this broadly distributed species has aesthetic and intrinsic values, and is the only large native herbivore in the plan area thereby making it an important species to protect. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. An extensive monitoring program will also be implemented by the wildlife agencies to delete unanticipated changes in ecosystem function and allow for adaptive management of the preserve system. Specific design criteria for linkages, road crossings/undercrossings are included in the Subarea Plans.

SPECIES EVALUATED FOR COVERAGE UNDER THE MSCP

¹Measures to conserve population of species on the MSCP plan's narrow endemic list must be incorporated into the Subarea Plans which do not have preserve/development areas specifically delineated based on site specific surveys. The City of San Diego's and the County of San Diego's Subarea Plan areas are primarily where this requirement is applicable and both Subarea Plans specify how MSCP narrow endemic species conservation measures.

Within the City of San Diego's MHPA, populations of MSCP narrow endemic species will be avoided.

The County will conserve MSCP narrow endemic species using a process which: first, requires avoidance to the maximum extent possible (avoidance); second, allows for a maximum 20 percent encroachment into a population if total avoidance is not possible (minimize); and third, requires mitigation at 1:1 to 3:1 ratio (in-kind) for impacts if avoidance and minimization of impacts would result in no reasonable use of the property. The County requirements for avoidance, minimization and mitigation are specifically described in the County's proposed BMO.

²The County's proposed BMO includes a list of sensitive plant species (Groups A and B) which require special consideration in project design. The County will conserve Group A and B species using a process which: first, requires avoidance to the maximum extent possible (avoidance); second, allows for a maximum 20 percent encroachment into a population if total avoidance is not possible (minimize); and third, requires mitigation at 1:1 to 3:1 ratio (in-kind) for impacts if avoidance and minimization of impacts would result in no reasonable use of the property.

³This column indicates the conservation level of the species. Not all major populations are in the GIS database, i.e., if specific locality data are lacking. In these cases, the percentage of major populations preserved is determined or estimated from the percentage of associated habitat in the MHPA.

Status Federal/State

FE = Federally endangered

PE = Proposed for federal listing as endangered

FT = Federally threatened

PT = Proposed for federal listing as threatened

C = Candidate for federal listing

*= Formerly Category 2 or Category 3 candidate for federal listing; no current federal status.

Protected = moratorium on hunting

None = no federal or state status

Shading indicates priority species (federally and state listed species, species proposed for listing, Category 1 candidate species, and NCCP target species).

Findings Definitions

Note: Area specific management directives for preserve areas will include specific guidelines for managing and monitoring covered species and their habitats, including following best management practices. Edge effects may include (but are not limited to) trampling, dumping, vehicular traffic, competition with invasive species, parasitism by cowbirds, predation by domestic animals, noise, collecting, recreational activities, and other human intrusion.

Source: 1996 MSCP GIS database. Military lands excluded from analysis.