

**MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For Cottonwood Sand Mining
PDS2018-MUP-18-023**

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December 3, 2021

I. Introduction

The proposed project is for the conversion of two existing golf courses to a sand mining operation that would be conducted in three phases over 10 years, with a final fourth phase for cleanup, equipment removal, and final reclamation. The approximately 280-acre project site is located in the unincorporated community of Rancho San Diego in eastern San Diego County. The site lies north of State Route (SR) 94 and east of SR 54, within the Cottonwood Golf Club. More specifically, the site occurs southeast of Willow Glen Drive, north of Jamul Drive, east of Jamacha Road, and west of Hillsdale Road. Steele Canyon Road bisects the project site from north to south, near the center of the site. The site is located within the Metro-Lakeside-Jamul Segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. Within the MSCP, there is 16.40 acres of Pre-Approved Mitigation Area (PAMA), occurring along the northeastern, southeastern, and southern project boundaries, and Minor Amendment lands, including 37.79 acres, occur in the southwestern portion of the site along Sweetwater River.

Biological resources on the site were evaluated in a Biological Resource Report (Helix Environmental Planning, November 2021). The project site supports 14 vegetation communities: disturbed wetland, freshwater marsh, southern cottonwood-willow riparian forest (including disturbed), southern willow scrub (including disturbed), tamarisk scrub, Arundo-dominated riparian, open water, Diegan coastal sage scrub (including disturbed), man-made pond, eucalyptus woodland, non-native woodland, non-native vegetation, disturbed habitat, and developed lands. Four special status plant species were observed within the project site: singlewhorl burrobrush (*Ambrosia monogyra*), San Diego sagewort (*Artemisia palmeri*), San Diego County viguiera (*Bahiopsis laciniata*), and southwestern spiny rush (*Juncus acutus ssp. leopoldii*). Additionally, U.S. Fish and Wildlife Service (USFWS) critical habitat for the federally endangered San Diego ambrosia (*Ambrosia pumila*) is present in the southwestern portion of the site. Seventeen special status animal species have been observed or detected on or directly adjacent to the project site: Cooper's hawk (*Accipiter cooperii*), great blue heron (*Ardea herodias*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), oak titmouse (*Baeolophus inornatus*), red-shouldered hawk (*Buteo lineatus*), green heron (*Butorides virescens*), turkey vulture (*Cathartes aura*), monarch butterfly (*Danaus plexippus*), peregrine falcon (*Falco peregrinus*), yellow-breasted chat (*Icteria virens*), coastal California gnatcatcher (*Polioptila californica*

californica), vermilion flycatcher (*Pyrocephalus rubinus*), yellow warbler (*Setophaga petechia*), western bluebird (*Sialia mexicana*), Lawrence's goldfinch (*Spinus lawrencei*), barn owl (*Tyto alba*), and least Bell's vireo (*Vireo bellii pusillus*). Additionally, USFWS critical habitat for the coastal California gnatcatcher and least Bell's vireo occur in the southwestern portion of the site, and critical habitat for the southwestern willow flycatcher is located immediately west of the site.

Potential significant impacts were identified relative to special status species, sensitive natural communities and riparian habitat, and local policies/ordinances. A total of 209.63 acres of the 276.63-acre project site, which are primarily comprised of disturbed habitat and developed lands associated with the existing golf course development, would be considered impacted. An additional 4.80 acres of off-site impacts associated with improvements to Willow Glen Drive would also occur as part of the project. The project would result in impacts to a total of 1.63 acres of riparian habitat or other sensitive natural communities consisting of 0.50 acre of disturbed wetland, 0.32 acre of southern cottonwood-willow riparian forest, 0.01 acre of Arundo-dominated riparian, and 0.8 acre of Diegan coastal sage scrub.

The project would result in impacts to one special status plant species: San Diego County viguiera, a County List D species. All other special status plant species observed on-site would either remain undisturbed or be conserved in a biological open space easement. The project would result in impacts to 0.70 acre of San Diego ambrosia critical habitat consisting of 0.001 acre of disturbed wetland, 0.20 acre of southern cottonwood-willow riparian forest, 0.46 acre of disturbed habitat, and 0.04 acre of developed lands.

The project would result in impacts to suitable breeding or foraging habitat for the 17 special status animal species observed or detected on or adjacent to the site, as well as nine additional species that were determined to have high potential to occur including western spadefoot, two-striped garter snake, sharp shinned hawk, Canada goose, white-tailed kite, California horned lark, merlin, loggerhead shrike, and Mexican long-tongued bat. Impacts would occur to 0.08 acres of USFWS-designated critical habitat for the coastal California gnatcatcher consisting of disturbed habitat. The project would also result in impacts to 1.14 acres of least Bell's vireo critical habitat consisting of 0.16 acre of southern cottonwood-willow riparian forest, 0.78 acre of disturbed habitat, 0.20 acre of developed land.

The project would impact 0.62 acre of wetland and 0.37 acre of non-wetland waters of the U.S., 0.83 acre of riparian habitat and 17.06 acres of streambed habitat under CDFW jurisdiction, and 0.83 acre of County RPO wetlands.

Mitigation measures are proposed to mitigate potentially significant impacts to special status species, sensitive vegetation communities/habitats, and compliance with local policies/ordinances. Implementation of these mitigation measures would mitigate potential impacts to below a level of significance. Mitigation measures include the revegetation and preservation of riparian/wetland and coastal sage scrub habitats; breeding season avoidance for the coastal California gnatcatcher, least Bell's vireo,

general birds, and raptors; creation and implementation of a Revegetation Plan and Wetland Mitigation Plan; installation of temporary fencing; biological monitoring; the dedication of an open space easement and limited building zone easement; and creation and implementation of a Resource Management Plan over the open space areas.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Disturbed Wetland	I	10.41	0.5	3:1	1.5
Freshwater March	I	0.31	0.0	--	0.0
Southern Cotton-willow Riparian Forest	I	13.96	0.32	3:1	0.96
Southern Willow Scrub	I	4.67	0.0	3:1	0.0
Tamarisk Scrub	I	0.62	0.0	--	0.0
Open Water	I	0.82	0.0	--	0.0
Arundo-dominated Riparian	I	0.54	0.01	3:1	0.03
Diegan Coastal Sage Scrub	II	1.7	0.8	1.5:1	1.2
Non-native Woodland	IV	0.8	0.8	--	0.0
Eucalyptus Woodland	IV	3.0	2.2	--	0.0
Non-native Vegetation	IV	4.2	5.7	--	0.0
Disturbed Habitat	IV	93.1	76.7	--	0.0
Man-made Pond	N/A	3.5	3.5	--	0.0
Developed Land	N/A	139.0	123.9	--	0.0
Total:	--	276.63	214.43	--	3.69

The findings contained within this document are based on County records and the Biological Resource Report (Helix Environmental Planning, November 2021). The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO), and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS). Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after concurrence is received from the Wildlife Agencies, the project has been approved by the County, these MSCP Findings are adopted by the hearing body, and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

The project site qualifies as a BRCA due to its location within a Pre-Approved Mitigation Area (PAMA) and a regional linkage/corridor.

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

As a BRCA, the open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement, and the Final MSCP Plan apply to this open space.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E), or Sensitive Plants (San Diego County Rare Plant List), or proposes impacts within a Biological Resource Core Area.

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

The project development would result in impacts to 209.63 acres of the 276.63-acre project site, which are primarily comprised of disturbed habitat and developed lands associated with the existing golf course development. The project would result in impacts to a total of 1.63 acres of riparian habitat or other sensitive natural communities, consisting of 0.50 acre of disturbed wetland, 0.32 acre of southern cottonwood-willow riparian forest, 0.01 acre of Arundo-dominated riparian, and 0.8 acre of Diegan coastal sage scrub. The project has also been setback at least five feet from the outer edge of each side of the Sweetwater River channel in order to retain existing hydrologic characteristics. Therefore, project development has been sited in areas to minimize impact to habitat.

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

The proposed project is not a residential project and cannot use clustering as a means of achieving avoidance. However, the project has minimized impacts to habitats and would revegetate the site following mining activities, placing 142.8 acres into an open space easement.

- 3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.**

The Resource Protection Ordinance (RPO) does not apply to the proposed project pursuant to Section 86.605(d). Therefore, exceptions to the RPO slope encroachment regulations were not required to avoid impacts to habitat.

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

Minimum private road standards have been applied to the onsite proposed private roads. Offsite road improvements are required as part of the project and must be to county standards for safety purposes. No reduction in road standards are necessary.

- 5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).**

The project complies with applicable design criteria in the County MSCP Subarea Plan (Attachment G and H) as discussed below.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

- 1. Acknowledge the “no net loss” of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.**

The project will impact 0.62 acres of U.S. Army Corps of Engineers (ACOE) wetland waters/riparian habitat, 0.83 acres of CDFW wetland waters/riparian

habitat, and 0.83 acres of RPO wetlands. The project proposes to mitigate for impacts to ACOE and CDFW resources at a 3:1 ratio, with a 1:1 creation component, through the preparation and implementation of a Wetland Mitigation Plan. However, the proposed project is exempt from the RPO pursuant to Section 86.605(d) with implementation of conditions (1)-(4). Therefore, the project will not conflict with the no-net-loss-of-wetlands standards.

2. Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

The project proposes to impact disturbed and developed habitats and minimize impacts to unique habitats and habitat features. Following mining activities, the site will be reclaimed and revegetated, as described in the Reclamation Plan, Revegetation Plan, and Wetland Mitigation Plan. The revegetated areas, including 142.8 acres, will be preserved within an onsite open space easement, and managed through a Resource Management Plan (RMP). Therefore, the project includes measures to maximize the habitat structural diversity of conserved habitat areas.

3. Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

Habitats on the project site are ranked as mainly developed by the MSCP habitat evaluation model, with small areas ranked as having very high habitat value. The project site contains 1.7 acres of coastal sage scrub habitat, of which 0.8 acres would be impacted. The project also proposes impacts to the small areas ranked as having high habitat value. However, following mining activities, the site will be reclaimed and revegetated, as described in the Reclamation Plan, Revegetation Plan, and Wetland Mitigation Plan. The revegetated areas, including 142.8 acres, will be preserved within an onsite open space easement, and managed through a Resource Management Plan (RMP). Therefore, the project provides for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

4. Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.

Following mining activities, the project will revegetate and place 142.8 acres of habitat into an open space easement, which will be managed through an RMP. Measures will be implemented to reduce edge effects including the implementation of open space fencing, open space signage, and a limited building zone easement.

5. Provide incentives for development in the least sensitive habitat areas.

The project development would result in impacts primarily to disturbed habitat and developed lands associated with the existing golf course development. The project would minimize impacts to sensitive habitat areas, including 1.63 acres of riparian habitat or other sensitive natural communities, consisting of 0.50 acre of disturbed wetland, 0.32 acre of southern cottonwood-willow riparian forest, 0.01 acre of Arundo-dominated riparian, and 0.8 acre of Diegan coastal sage scrub. The project has also been setback at least five feet from the outer edge of each side of the Sweetwater River channel in order to retain existing hydrologic characteristics.

6. Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.

Two MSCP narrow endemic species, peregrine falcon and least Bell's vireo, were observed within the project site. The project site lacks suitable breeding habitat for peregrine falcon but does contain suitable foraging habitat for this species. The project site does not contain a core population of peregrine falcon as the site lacks suitable breeding habitat and observations are limited to foraging individuals. Therefore, no impact would occur to a core population of peregrine falcon. Impacts to suitable foraging habitat for this species would be mitigated through the revegetation of habitat.

Least Bell's vireo was detected within the riparian habitat both on-site and immediately adjacent to the project site. However, the project site does not contain a core vireo population as the project site contains limited suitable habitat for the species, which would be avoided by the proposed project. Therefore, the project would not result significant impacts to a core population of least Bell's vireo. The project would impact approximately 0.32 acre of southern cottonwood-willow riparian forest, which includes 0.16 acre mapped as least Bell's vireo critical habitat, with potential to support least Bell's vireo. Direct impacts to occupied vireo habitat would be mitigated through revegetation of habitat and breeding season avoidance.

7. Preserve the biological integrity of linkages between BRCAs.

The project site is located within an identified habitat linkage between the McGinty Mountain/Sycuan Peak-Dehesa BRCA and Sweetwater Reservoir/San Miguel Mountain BRCA, in the South County MSCP. As part of the reclamation process, the proposed project would substantially improve the condition of the

existing linkage through widening of the Sweetwater River floodplain and planting of riparian habitat. A riparian corridor would be re-established throughout the site, which would encourage and facilitate wildlife movement within the region. Therefore, the project would ultimately conserve and enhance the functions and values of the habitat linkage in accordance with the MSCP and BMO.

8. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

The proposed project site does not contain any MSCP covered plant species. MSCP covered wildlife species observed on the site include Cooper's hawk, peregrine falcon, coastal California gnatcatcher, western bluebird, least Bell's vireo, and Belding's orange-throated whiptail. The proposed project achieves the conservation goals for these covered species through implementation of mitigation measures to reduce edge effects and minimize disturbance. These mitigation measures include breeding season avoidance, biological monitoring, revegetation, and dedication of an open space easement, with open space fencing and signage.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

The project site is located within an identified habitat linkage between the McGinty Mountain/Sycuan Peak-Dehesa BRCA and Sweetwater Reservoir/San Miguel Mountain BRCA, in the South County MSCP. As part of the reclamation process, the proposed project would substantially improve the condition of the existing linkage through widening of the Sweetwater River floodplain and planting of riparian habitat. A riparian corridor would be re-established throughout the site, which would encourage and facilitate wildlife movement within the region. Therefore, the project would ultimately conserve and enhance the functions and values of the habitat linkage in accordance with the MSCP and BMO.

2. Existing movement corridors within linkages will be identified and maintained.

The project site is located within an identified habitat linkage between the McGinty Mountain/Sycuan Peak-Dehesa BRCA and Sweetwater Reservoir/San Miguel Mountain BRCA, in the South County MSCP. The site is currently an active golf course that lacks sufficient vegetative cover to conceal and

encourage wildlife movement through the linkage. As part of the reclamation process, the proposed project would substantially improve the condition of the existing linkage through widening of the Sweetwater River floodplain and planting of riparian habitat. A riparian corridor would be re-established throughout the site, which would encourage and facilitate wildlife movement through the site.

3. Corridors with good vegetative and/or topographic cover will be protected.

The site is currently an active golf course that lacks sufficient vegetative and topographic cover to conceal and encourage wildlife movement through the linkage. As part of the proposed reclamation, the project would increase topographic complexity of the site by establishing a widened Sweetwater River floodplain with bordering constructed slopes and elevated graded pads to the north and south. This would create topographic features more favorable to wildlife species movement along the linkage path. The project would also increase vegetative cover within the widened riparian corridor providing adequate coverage for wildlife species that would utilize the linkage.

4. Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.

The project site is located within an identified habitat linkage between the McGinty Mountain/Sycuan Peak-Dehesa BRCA and Sweetwater Reservoir/San Miguel Mountain BRCA, in the South County MSCP. The site is currently an active golf course that lacks sufficient vegetative cover to conceal and encourage wildlife movement through the linkage. As part of the reclamation process, the proposed project would substantially improve the condition of the existing linkage through widening of the Sweetwater River floodplain and planting of riparian habitat. A riparian corridor would be re-established throughout the site, which would encourage and facilitate wildlife movement for a wide range of species through the site.

5. The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.

As part of the project's reclamation process, the Sweetwater River floodplain, which is currently disturbed, would be expanded throughout the entire length of the project site (approximately 10,040 linear feet). The channel and associated flood prone area, currently measuring between 35 and 120 feet wide, would be substantially expanded to an average width of approximately 250 to 300 feet. This additional width would be more consistent with both historical conditions on the site and current conditions downstream of the site. The expanded floodplain

would be revegetated with riparian habitat resulting in a post-project condition that would restore wildlife linkage and corridor functions and is biologically superior to the existing condition. The established widened riparian corridor would re-establish connectivity between upstream and downstream areas by providing increased vegetative cover and access to higher quality resources which would promote and facilitate wildlife use and movement in the region and local area that is currently constrained by the existing golf course development. The project would ultimately contribute approximately 142.8 acres of preserved, rehabilitated, restored, and revegetated habitat to the linkage which will be placed within a biological open space easement.

- 6. If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

The project would not narrow the existing wildlife linkage width. The proposed post-reclamation condition of the site would consist of an expanded Sweetwater River floodplain that would be restored and revegetated with wetland/riparian habitat. Graded slopes would be created on either side of the channel and planted with coastal sage scrub. This would increase the width of the existing linkage and restore available vegetative cover that would encourage and adequately conceal wildlife movement within the area. The preserved, rehabilitated, restored, and revegetated riparian habitat along Sweetwater River would be conserved within a biological open space easement that directly abuts existing riparian habitat to the west located within the San Diego National Wildlife Refuge (SDNWR). The biological open space would follow the path of the river across the entire site, extending approximately 10,040 feet from end to end, with an average width of approximately 600 feet. The project does not propose any additional development following reclamation of the site, though select areas outside of the biological open space would be available for land uses allowed by the existing land use designation and zoning classifications.

- 7. Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

The project would not impair visual continuity within corridors or linkages within the local area. The site is currently an active golf course that lacks sufficient vegetative cover to conceal and encourage wildlife movement through the linkage. The proposed project would predominately result in impacts to disturbed

and developed areas associated with the golf course development; only 1.63 acres of the 209.63 acres of the onsite impacts would occur to native or sensitive habitats. These impacts would occur in 20- to 30-acre subphases across the site, rather than the entire project footprint impacted concurrently, during mining and reclamation activities leaving other portions of the site either undisturbed or in the five-year restoration and revegetation monitoring period and accessible for foraging. Reclamation of the site would include widening of the Sweetwater River floodplain and planting the area with native wetland/riparian habitat, first occurring adjacent to existing riparian habitat along the Sweetwater River channel in the western portion of the site. As mining activities progress eastward and reclamation is completed, active revegetation areas would provide a buffer between later extraction areas and existing riparian habitat off-site improving visual continuity within the linkage.

8. Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.

The project occurs along the path of a constrained linkage that is already subjected to noise and nighttime lighting impacts associated with operation of the Cottonwood Golf Club. The reach of river traversing the site currently has low function as a wildlife corridor as it is narrow, lacks suitable vegetative cover, and is adjacent to developed golf course operations. Large portions of the project site are fenced, further impeding wildlife access across the site.

The development will be subject to the San Diego County Noise Ordinance and Light Pollution Code, which set specific limits for noise and light trespass. The Light Pollution Code prohibits light from affecting biological open space.

9. Barriers, such as roads, will be minimized. Roads that cross corridors should have ten-foot-high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.

The project would not include the construction or placement of barriers in any wildlife movement paths. Currently, Steele Canyon Road crosses the site north to south bisecting the entirety of the east-west linkage; therefore, species that are currently accessing the project site and crossing below the road will continue to be able to do so following project implementation. No additional road crossings are proposed as part of the project.

10. Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition

and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.

The project does not propose wildlife crossings.

- 11. If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.**

The project would also preserve and rehabilitate existing riparian habitat thereby preserving stepping-stone/archipelago habitat for avian species moving through the area. Although 0.32 acre of riparian habitat would be impacted as part of project implementation, these impacts are on the outer edges of existing habitat and would not adversely affect visual continuity within the wildlife linkage. As part of the proposed reclamation, the project would increase topographic complexity of the site which would create topographic features more favorable to wildlife species movement along the linkage path. The project would also increase vegetative cover within the widened riparian corridor providing adequate coverage for wildlife species that would utilize the linkage.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

- 1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.**

The project will impact 0.62 acres of U.S. Army Corps of Engineers (ACOE) wetland waters/riparian habitat, 0.83 acres of CDFW wetland waters/riparian habitat, and 0.83 acres of RPO wetlands. The project proposes to mitigate for impacts to ACOE and CDFW resources at a 3:1 ratio, with a 1:1 creation component, through the preparation and implementation of a Wetland Mitigation Plan. However, the proposed project is exempt from the RPO pursuant to Section 86.605(d) with implementation of conditions (1)-(4). Therefore, the project will not conflict with the no-net-loss-of-wetlands standards.

- 2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.**

The project proposes to impact disturbed and developed habitats and minimize impacts to unique habitats and habitat features. Following mining activities, the site will be reclaimed and revegetated, as described in the Reclamation Plan, Revegetation Plan, and Wetland Mitigation Plan. The revegetated areas, including

142.8 acres, will be preserved within an onsite open space easement, and managed through a Resource Management Plan (RMP). Therefore, the project includes measures to maximize the habitat structural diversity of habitat areas.

- 3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.**

Habitats on the project site are ranked as mainly Developed by the MSCP habitat evaluation model, with small areas ranked as having very high habitat value. The project site contains 1.7 acres of coastal sage scrub habitat, of which 0.8 acres would be impacted. The project also proposes impacts to the small areas ranked as having high habitat value. However, following mining activities, the site will be reclaimed and revegetated, as described in the Reclamation Plan, Revegetation Plan, and Wetland Mitigation Plan. The revegetated areas, including 142.8 acres, will be preserved within an onsite open space easement, and managed through a Resource Management Plan (RMP). Therefore, the project provides for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

- 4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.**

Following mining activities, the project will revegetate and place 142.8 acres of habitat into an open space easement, which will be managed through an RMP. Therefore, the project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

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

The project development would result in impacts primarily to disturbed habitat and developed lands associated with the existing golf course development. The project would minimize impacts to sensitive habitat areas, including 1.63 acres of riparian habitat or other sensitive natural communities, consisting of 0.50 acre of disturbed wetland, 0.32 acre of southern cottonwood-willow riparian forest, 0.01 acre of Arundo-dominated riparian, and 0.8 acre of Diegan coastal sage scrub. The project has also been setback at least five feet from the outer edge of each side of the Sweetwater River channel in order to retain existing hydrologic characteristics.

- 6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.**

The project site does not contain key populations of covered plant species. However, the proposed project provides for the conservation of habitat for covered wildlife species including Belding's orange-throated whiptail, coastal California gnatcatcher, Cooper's hawk, least Bell's vireo, peregrine falcon, and western bluebird. The proposed open space will include a wide range of sensitive habitats ranging from riparian to coastal sage scrub, following revegetation.

- 7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.**

Following mining activities, 142.8 acres of habitat will be placed within an open space easement and managed through an RMP. This will contribute to the preservation of wide-ranging species such as mule deer, mountain lion, and golden eagle.

- 8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

Two MSCP narrow endemic species, peregrine falcon and least Bell's vireo, were observed within the project site. The project site does not contain a core population of peregrine falcon as the site lacks suitable breeding habitat and observations are limited to foraging individuals. Least Bell's vireo was detected within the riparian habitat both on-site and immediately adjacent to the project site. However, the project site does not contain a core vireo population as the project site contains limited suitable habitat for the species, which would be avoided by the proposed project. Therefore, the project would not result significant impacts to a core population of peregrine falcon or least Bell's vireo.

- 9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.**

The proposed project will not jeopardize the preserve system assembly within the Subarea Plan. The proposed project will contribute to preserve assembly by adding 142.8 acres to the preserve that will be managed through an RMP.

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

Following mining activities and completion of the proposed revegetation, 142.8 acres of habitat will be placed within an onsite open space easement. Provisions the reduce edge effects, including open space fencing, open space signage, and a

limited building zone, have been incorporated into the project design in order to reduce edge effects.

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

The proposed project has made every effort to avoid impacts to BRCAs, sensitive resources, and sensitive species as defined in the BMO. Since the proposed project site is located within a BRCA and supports many sensitive resources, the impact footprint was concentrated within disturbed habitat and developed lands, associated with the existing golf course, minimizing impacts to sensitive resources. The proposed project does not contain covered plant species. However, the proposed project provides for the conservation of habitat for covered wildlife species including Belding's orange-throated whiptail, coastal California gnatcatcher, Cooper's hawk, least Bell's vireo, peregrine falcon, and western bluebird. Following mining activities, the site would be reclaimed and revegetated, as described in the Reclamation Plan, Revegetation Plan, and Wetland Mitigation Plan. The revegetated area, including 142.8 acres, would be preserved within an open space easement. The proposed open space will be protected by a recorded conservation easement, fencing, and signage, and will be managed and monitored in perpetuity by an approved conservancy following an approved RMP, funded by a non-wasting endowment. The proposed project is consistent with the goals of the MSCP.

Kendalyn White, Planning & Development Services

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