MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For El Monte Sand Mine
PDS2015-MUP-98-014W2
APN (s) 390-040-51-00, 391-071-04-00, 391-061-01-00, 392-060-29-00, 392-150-17-00, 393-011-01-00

August 29, 2018

DRAFT FINDINGS
Note: These draft MSCP Findings have not been reviewed by the Wildlife Agencies.

I. Introduction

The proposed El Monte Sand Mining Project (project), located in the Lakeside Community Planning Area, is within unincorporated land in San Diego County, California. The proposed project is a combined mineral extraction and reclamation project. The project would extract approximately 12.5 million tons of aggregate material from the El Monte Valley for commercial use and then process and market the aggregate material using conventional earth moving and processing equipment. Extractive and reclamation operations for the project are expected to continue for approximately 16 years (12 years of mining and reclamation, with an additional 4 years of reclamation following completion of mining). The project includes the three principal components: (1) Mining Component; (2) Reclamation Component; and (3) Revegetation Component. The Mining Component would consist of active mining that would occur over approximately 12 years, and would be completed in four distinct phases. The Reclamation Component consists of progressively reclaiming the disturbed areas previously mined. Reclamation will be an ongoing process that commences when mining operations have ceased within a given area and continues until all mining related disturbance is reclaimed and all equipment involved in these operations have been removed. Reclaimed areas would be restored to an end use of undeveloped land with a recreational trail system. The Revegetation Component is to ensure successful restoration/creation of self-sustaining native habitats, which will serve as mitigation for impacts to sensitive vegetation communities, pursuant to County regulations. In contrast to the Reclamation Plan, the goal of the Revegetation Plan is to restore the ecological functions and values of the impacted habitats, rather than to provide landscape stability.

The project site was previously owned by the Helix Water District, and as such, was designated as a Special District area, not included within the South County Multiple Species Conservation Program (MSCP) Subarea Plan area; however the project site is surrounded by lands located within the within the Metro-Lakeside-Jamul segment. A significant portion of the adjacent lands are designated as Pre-Approved Mitigation Area (PAMA). The project proposes a Boundary Line Adjustment (BLA) to amend the project site into MSCP or another process agreed upon with the Wildlife Agencies for “take” of listed species (least Bell’s vireo and coastal California gnatcatcher). The proposed BLA would contribute the total 479.5-acre project area to the PAMA of the County’s MSCP Subarea Plan thereby increasing the total size of the PAMA.

The project would directly impact approximately 262 acres of land located in El Monte Valley on approximately 479.5 acres currently owned by El Monte Nature Preserve. A Major Use Permit (MUP) was previously approved for the 479.5-acre area in 2000 for the El Capitan Golf Course project. Following approval of the golf course project, site grading commenced, but was discontinued over market concerns with the golf use. The current project proposes to modify the MUP approved for the golf project to allow mineral extraction within a portion of the project area followed by revegetation to undeveloped open space with a recreational trail system.

Biological studies were conducted in 2006, 2010, 2011, 2015, 2016, and 2017. The surveys and investigations that were conducted between 2006 and 2015 include a biological reconnaissance survey, vegetation mapping, routine wetland delineation, focused rare plant surveys, focused tree surveys, focused coastal California gnatcatcher (*Polioptila californica californica*) surveys, focused least Bell's vireo (*Vireo belli pusillus*) surveys, and a focused habitat assessment for the Quino checkerspot butterfly (*Euphydryas editha quino;* Quino). In 2016, a jurisdictional delineation survey was completed to update the previous effort for the proposed project area.

Seven sensitive vegetation communities or other land cover types occur within the proposed project area, which include southern cottonwood-willow riparian forest (11.18 acres), southern willow scrub (0.71 acres), tamarisk scrub (85.69 acres), non-vegetated channel (1.66 acres), Diegan coastal sage scrub (10.38 acres), and non-native grassland (135.75 acres). The remaining habitats include eucalyptus woodland (2.62 acres), disturbed habitat (228.52 acres), and developed areas (3.03 acres).

A number of sensitive biological resources were detected or are known to occur within and adjacent to the proposed project area based on direct or indirect observations made during the field surveys and investigations. Additional sensitive biological resources were determined to have potential to occur onsite. Several of these sensitive biological resources that were detected have the potential to be impacted by the proposed project.

One special-status, narrow endemic plant, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*), is known to occur onsite. One individual of this species was identified outside of the Major Use Permit boundary and will not be directly impacted by the project. Six (6) sensitive wildlife species were detected on or adjacent to the proposed project area during field surveys for the project, including the Cooper's hawk (*Accipiter cooperi*), sharp-shinned hawk (*Accipiter striatus*), red-shouldered hawk (*Buteo lineatus*), osprey (*Pandion haliaetus*), turkey vulture (*Cathartes aura*), white-tailed kite (*Elanus leucurus*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), coastal California gnatcatcher, and least Bell's vireo. A herpetofaunal study conducted by U.S. Geological Survey (USGS) in 2016 confirmed the presence of the following seven (7) sensitive species within the biological study area: western spadefoot toad (*Spea hammondii*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), southern California legless lizard (*Anniella stebbinsi*), San Diego banded gecko (*Coleonyx variegatus abbotti*), coast patch-nosed snake (*Salvadora hexalepis virgultea*), glossy snake (*Arizona elegans*), and red-diamond rattlesnake (*Crotalus ruber*).

Sensitive vegetation communities and other land cover types occurring within the proposed project area will be directly impacted by the proposed project (Table 1). Mitigation ratios for impacts to these vegetation communities and other land cover types are recommended under the County's Guidelines for Determining Significance for Biological Resources for impacts that occur outside approved Multiple Species Conservation Program (MSCP) Plans (Table 2). Mitigation for unavoidable permanent impacts to the native and naturalized habitats that require mitigation would be provided in compliance with mitigation ratios approved for the project by the County and the resource agencies.

Jurisdictional features were delineated within the proposed project area during surveys conducted in 2011 and updated in 2016. The general methodology detailed in the 1987 USACE Manual was used as the basis to delineate wetland waters of the United States. The 2008 Arid West Supplement was used as the basis for determining and recording indicators for hydrophytic vegetation, hydric soils,

and wetland hydrology. Any impacts to state or federal jurisdictional areas would be considered adverse and significant and potential mitigation would be required.

Potentially significant impacts include indirect impacts to the Palmer's goldenbush. However, mitigation measures would minimize potential impacts. Construction of the proposed project would not result in direct or indirect impacts to other sensitive plants.

Potentially significant impacts would affect the federally listed and/or Group I animal species San Diego banded gecko, coastal California gnatcatcher, least Bell's vireo, Cooper's hawk, sharp-shinned hawk, red-shouldered hawk, osprey, turkey vulture, white-tailed kite, yellow breasted chat, and loggerhead shrike that are known to occur within the biological study area. Direct impacts include direct mortality of individuals and nests, loss of foraging and breeding habitat, and construction-generated noise, dust, sedimentation into adjacent habitats, and nighttime lighting. However, mitigation measures will be implemented to avoid/minimize impacts. Avoidance of the bird breeding season, preconstruction surveys to confirm absence, and biological monitoring during mining and construction activities will reduce potential impacts to breeding least Bell's vireo and coastal California gnatcatcher, as well as other nesting birds covered under the Migratory Bird Treaty Act (MBTA). With impact avoidance, minimization, and compensation measures incorporated, the impacts of the proposed project on sensitive wildlife species are avoided or reduced. With the implementation of those measures, the proposed project will avoid or minimize construction-generated effects including noise, fugitive dust, sedimentation, erosion, and runoff into occupied habitat within the vicinity of the proposed project.

Mining activities will be phased and revegetated once mining is complete, thus habitats that will be temporarily lost during mining will be replaced and mitigated at required ratios to increase available suitable habitats. Reclamation and revegetation of habitats will be compensated in accordance with County guidelines – the Guidelines for Determining Significance for Biological Resources or the County's Biological Mitigation Ordinance if the project is amended into the MSCP.

Table 1. Impacts to Habitat

Habitat Type / Vegetation Community	Temporary Impacts[1]	Permanent Impacts[2]	Impact Neutral[3]	Total Impacts
Riparian and Wetlands				
Southern Cottonwood-Willow Riparian Forest	0.00	0.00	6.97	0.00
Southern Willow Scrub	0.00	0.12	0.00	0.12
Tamarisk Scrub	38.80	3.01	0.00	41.81
Non-Vegetated Channel	0.35	0.01	0.07	0.36
Uplands				
Diegan Coastal Sage Scrub	2.06	1.56	0.00	3.61
Southern Mixed Chaparral	0.00	0.00	0.00	0.00
Non-Native Grassland	74.44	12.12	1.36	86.55
Eucalyptus Woodland	0.08	1.22	0.00	1.30
Other Cover Types				
Disturbed Habitat	110.68	15.35	0.04	126.04
Agriculture	0.00	0.00	0.00	0.00
Developed	0.00	2.55	0.00	2.55
Mature Riparian Woodland[4]	0.00	0.00	0.00	0.00
Totals[5]	**226.40**	**35.94**	**8.45**	**262.34**

[1] Temporary impacts include all of the mining extraction areas, processing areas, and temporary access roads, as well as the dry depression, filled-in, dry depression previously excavated as a golf course pond, which will be filled in during Phase 1. These areas will be revegetated upon completion of each mining phase.

[2] Permanent impacts consist of the permanent drop structure, which will be built on the eastern end of the mining area, fuel modifications zones, which will be permanently maintained to ensure that vegetation remains at or below three inches in height, and a trail system, which will result in permanent trails along the perimeter of the area of disturbance and MUP boundary.

[3] Impact neutral areas are areas that are not considered impacted, but cannot be credited toward mitigation requirements, such as wetland buffers.

[4] A total of 8.45 acres was mapped as “Mature Riparian Woodland,” pursuant to the County Resource Protection Ordinance definition. Note that Mature Riparian Woodland is not a Holland (1986)/Oberbauer et al. (2008) category. The vegetation was mapped as a GIS overlay on top of the Holland/Oberbauer-based vegetation mapping; therefore, this acreage is not added to the acreage totals. The total impact neutral acreage for Holland/Oberbauer vegetation types

[5] Due to rounding, totals may differ slightly from numbers in column.

TABLE 2. VEGETATION COMMUNITIES, IMPACTS, AND MITIGATION (ACRES)

Habitat Type / Vegetation Community	Total Impacts	Mitigation Ratio[1]	Habitat Mitigation[2]	Reclamation[2]
Riparian and Wetlands				
Southern Cottonwood-willow Riparian Forest	0.00	3:1	0.00	12.43
Southern Willow Scrub	0.12	3:1	0.36	46.78
Tamarisk Scrub	41.81	3:1	125.43[3]	0.00
Non-Vegetated Channel	0.36	1:1	0.36[4]	8.55
Subtotal	*42.29*		*126.15*	*67.76*

Habitat Type / Vegetation Community	Total Impacts	Mitigation Ratio[1]	Habitat Mitigation[2]	Reclamation[2]
Uplands				
Diegan Coastal Sage Scrub	3.61	2:1	7.22	44.72
Non-Native Grassland	86.55	0.5:1	43.27[5]	0.00
Eucalyptus Woodland	1.30	N/A	0.00	0.00
Subtotal	*91.46*		*50.49*	*44.72*
Other Cover Types				
Disturbed Habitat	126.04	N/A	0.00	0.00
Developed	2.55	N/A	0.00	0.00
Subtotal	*128.59*		*0.00*	*0.00*
Totals[6]	**262.34**		**176.64**	**112.48**

[1] Habitat mitigation ratios (Outside of approved MSCP Plan areas) are provided from the County's Guidelines for Determining Significance for Biological Resources (September 2010).
[2] A combination of habitat mitigation and reclamation will occur within the temporary impact acreage (226.40 acres).
[3] Tamarisk Scrub will be mitigated at a 3:1 ratio by a combination of restoration of native Riparian Forest and Riparian Scrub habitats within post-mining areas (62.71 acres; 1.5:1), and restoration of riparian and transitional habitat outside of mining limits but within the project site (62.72 acres, rounded up to 64.16 acres to address all riparian areas on-site; 1.5:1) via exotic plant removal and activities to promote native plant revegetation.
[4] Non-Vegetated Channel will be mitigated by restoration of Vegetated Channel since it is expected the post-mining grades and conditions will support native plants in the channel.
[5] Non-Native Grassland will be mitigated by restoration of Diegan Coastal Sage Scrub.
[6] Due to rounding, totals may differ slightly from numbers in column.

The findings contained within this document are based on County records, staff field site visit, and the Biological Resources Report: El Monte San Mining Project dated July 2018 prepared by Environmental Science Associates (ESA). The information contained within these findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Wildlife and the US Fish and Wildlife Service ("the Wildlife Agencies"). Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, MSCP conformance has been established through official concurrence from the Wildlife Agencies for a boundary line adjustment (or other process agreed upon by the Wildlife Agencies to amend the project site into the MSCP), 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 proposed Impact Area is found to qualify as a BRCA for the following reasons: The applicants are proposing to amend the project site into the South County MSCP Subarea Plan Area as designated Pre-Approved Mitigation Area (PAMA); A portion of the project site has been identified as having very high and high habitat value according to the Habitat Evaluation Model; The project site is located within the Lake Jennings/Wildcat Canyon BRCA; The project site is contiguous with a large block of habitat.

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

Mitigation consisting of preservation of approximately 178 acres of the 479.5 acre project site will occur onsite through reclamation, restoration, and enhancement of habitats after the site has been mined for mineral resources. For the reasons stated above (II. Biological Resources Core Area Determination (A)), the Mitigation Site qualifies as a BRCA.

If the project site is amended into the South County MSCP Subarea Plan Area, as a Biological Resource Core Area, the biological open space resulting from this project would be 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 will focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat. Impacts will also occur to tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III). Impacts will occur to 4.0 acres of other sensitive native habitats, which includes southern willow scrub (0.12 acres, Tier I), non-vegetated channel (0.36 acres), and Diegan coastal sage scrub (3.6 acres, Tier II). The entirety of the mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, including a 50-foot buffer will be avoided. Thus the project avoids impacts to the most sensitive and native habitats. Therefore the project meets the County's criterion 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.

Clustering usually refers to residential lot sizes and location. This project will primarily result in temporary mining impacts. Mitigation, including reclamation and restoration of excavated areas, will occur immediately following completion of each mining phase. Therefore, the project meets this criterion.

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

   The project will focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat. Impacts will also occur to tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III). Impacts will occur to 4.0 acres of other sensitive native habitats, which includes southern willow scrub (0.12 acres, Tier I), non-vegetated channel (0.36 acres), and Diegan coastal sage scrub (3.6 acres, Tier II). The entirety of the mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, including a 50-foot buffer will be avoided. Thus the project has already been designed to focus impacts within less sensitive and non-native habitats. Therefore the project meets the County's criterion of encroaching onto steep slopes, when necessary, as a means of avoiding impacts to habitat.

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

   A temporary dirt haul road will be constructed for the purpose of providing site access during mining operations. The haul road will be removed in phases as each mining phase is completed and the associated area revegetated/reclaimed. The entirety of the road will be removed upon completion of mining operations (approximately 12 years). Therefore, the County's criterion to consider a reduction in road standards does not apply.

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 proposed project is in compliance with Attachments G and H. See below for additional details.

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 Preserve 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.**

Unavoidable impact will occur to approximately 0.01 acre of permanent impacts and 0.35 acre of temporary impacts to non-wetland waters of the U.S./State (USACE/RWQCB) (0.36 acres total). Implementation of mitigation measures, including wetland permits and reclamation, restoration, and enhancement of native habitats will reduce the direct impacts to non-wetland jurisdictional waters and riparian habitats as defined by USACE to less than significant.

The proposed project would result in 39.18 acres of temporary impacts and 2.28 acres of permanent impacts to State waters and associated riparian habitat, and County of San Diego Resource Protection Ordinance (RPO) wetlands (41.46 acres total). The project is exempt from the RPO under Section 86.605(d), which provides an exemption for sand, gravel, and mineral extraction projects that meet certain mitigation measures. No federal or state protected wetlands will be impacted. Therefore the project meets this criterion to maintain a "no net loss" of wetlands standard for State and Federal wetlands and is in compliance with County ordinances.

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

The project will focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat, tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III), totaling 254.4 acres of the total 262.3 impacted areas. The entirety of the mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, including a 50-foot buffer will be avoided. Mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement of habitats. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. These mitigation measures will eventually result in higher quality habitat that provides long-term improved habitat structural diversity. Approximately 178 acres onsite will be placed within a biological open space easement upon completion of the mining operations. Therefore the project meets the County's criterion of maximizing the habitat structural diversity of habitat areas to be conserved in the long-term.

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.

The Habitat Evaluation Model identifies the riparian area along the river corridor as having high and very high biological value, surrounded by predominantly agricultural lands and scattered patches of low and moderate habitat value areas. Approximately 6.8 acres of the 10.4 total acres of Diegan coastal sage scrub habitat on site and the entire 7.0 acres of mature riparian woodland, dominated by southern cottonwood-willow riparian forest (Tier I) will not be directly impacted by the project. The remaining high and very high value riparian area, dominated by tamarisk scrub habitat, would be impacted by the project. Mitigation for temporal impacts associated with mining operations will be provided through reclamation, revegetation, and enhancement of habitat. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern

willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. These mitigation measures would eventually result in higher quality habitat. Approximately 178 acres of the project site will be placed within a biological open space easement upon completion of the mining operations. Therefore, through mitigation, the project meets the County's criterion to provide for the conservation of spatially representative high and very high value habitats over the long-term.

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.**

   Mining activities will be phased in four stages with reclamation and restoration to occur immediately following completion of each mining phase. As a result, the area of temporary impact will be contained within a relatively small portion of the property at any given time. Mitigation for temporal impacts will be provided through reclamation, revegetation and enhancement of the majority of the project site. These mitigation measures would eventually result in higher quality habitat long-term post mining operations. A significant portion of the project site will be conserved within a biological open space easement in perpetuity following project completion. Permanent impacts will consist of a drop structure, fuel modification zone areas adjacent to existing development areas, and a trail system and associated staging areas for recreational use consistent with the County's Community Trails Master Plan. Therefore, the project meets the County's criterion to create significant blocks of habitat to reduce long-term edge effects.

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

   The project will focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat. Impacts will also occur to tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III). Impacts will occur to 4.0 acres of other sensitive habitats, which includes southern willow scrub (0.12 acres, Tier I), non-vegetated channel (0.36 acres), and Diegan coastal sage scrub (3.6 acres, Tier II). The entirety of the mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, including a 50-foot buffer will not be directly impacted by the project. Further mitigation for temporal impacts to sensitive habitats will occur through reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland, by up-tiering these habitats to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats, eventually resulting in higher quality habitat. Therefore the project meets the County's criterion to impact the least sensitive habitat areas.

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

The project site contains one narrow endemic plant species, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) (BMO, Attachment E). One individual Palmer's goldenbush was observed outside of the Major Use Permit boundary and will not be directly impacted by the project. One individual would not be considered a core population. Additionally, one narrow endemic animal species, least Bell's vireo, was observed within the biological study area, and one narrow endemic species, golden eagle, has potential to use the site for foraging (BMO Attachment D). The site contains USFWS designated critical habitat for arroyo toad, also a narrow endemic species; however presence of arroyo toad is considered unlikely due to habitat conditions on site. The project would result in temporary loss of habitat for narrow endemic species where active mining operations are occurring. These impacts will be limited to a relatively small portion of the project area at any given time as mining operations proceed in four phases. Most of the project area will be available for wildlife use during each phase. Once the excavation has been completed, the majority of the mining area will be reclaimed and revegetated in order to mitigate for temporal impacts, eventually resulting in higher quality habitat for narrow endemic species. Therefore the project meets this criterion over the long term.

7. Preserve the biological integrity of linkages between BRCAs.

The project is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCA; however the San Diego River corridor represents a local habitat linkage in the County. The project may temporarily affect east-west wildlife movement along the existing river channel during excavation. However, during construction, wildlife would be able to move along the undeveloped upland setback of 150 to 300 feet that would be established along the northern and southern project boundaries. In addition, since excavation would occur in four phases, north-west movement would not be significantly impeded. Further, once the excavation has been completed, the majority of the mining area would be reclaimed and revegetated with native habitats, providing an east-west linkage of more than 1,000 feet in width in the east-west direction. Approximately 178 acres of the project site will be conserved within a biological open space easement, providing habitat for wildlife movement in perpetuity. Although narrow, east-west corridors will be created temporarily during mining operations, the project will provide long-term conservation of habitat linkages. Therefore the project will not jeopardize the long-term biological integrity of a linkage between BRCA. The project meets this criterion.

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

One covered plant species, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*), is known to occur on-site. One individual of this species was observed outside of the Major Use Permit boundary and will not be directly impacted by the project. Six sensitive wildlife species covered by the South County MSCP were observed during field surveys, including coast horned lizard (*Phrynosoma blainvillii*) orange-throated whiptail (*Aspidoscelis hyperythrus*), Cooper's hawk (*Accipiter cooperii*), coastal California gnatcatcher, western bluebird (*Sialia mexicana*), least Bell's vireo (*Vireo bellii pusilus*). The project would result in temporary loss of habitat where active mining operations are occurring. These impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases.

Most of the project area will be available for wildlife use during each phase. Once the excavation has been completed, 99 percent of the mining area will be reclaimed and revegetated in order to mitigate for temporal impacts. These mitigation measures will eventually result in higher quality habitat conserved in perpetuity for covered species. Therefore the project will achieve the conservation goals for covered species and habitats in the long term. The project meets this criterion.

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 is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCA; however the San Diego River corridor represents a local habitat linkage in the County. The project may temporarily affect east-west wildlife movement along the existing river channel during excavation. During construction, wildlife will be able to move along the undeveloped upland setback of 150 to 300 feet that will be established along the northern and southern project boundaries. In addition, since excavation will occur in four phases, north-south movement would not be significantly impeded. Further, once the excavation has been completed, the majority of the mining area would be reclaimed and revegetated with native habitats, providing an east-west linkage of more than 1,000 feet in width in the east-west direction. Approximately 178 acres of the project site will be conserved within a biological open space easement, providing habitat for wildlife movement in perpetuity. These mitigation measures would eventually result in higher quality habitat wildlife movement following mining operations. Therefore the project will maintain habitat linkages rather than just corridors.

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

The project is located within the Lake Jennings/Wildcat Canyon BRCA. The project area runs predominately in an east-west direction along a 2.7-mile portion of the San Diego River. The San Diego River corridor represents a local habitat linkage. The site also offers function of a north-south corridor across the western portion of El Monte Valley, including access to Lake Jennings. Existing adjacent land uses bordering the site consist of open space, agriculture, grazing lands, and residential development. A potential habitat linkage connecting the open, natural areas to the north and south of the site exists approximately in the middle of the project area, where the undeveloped north-facing hills on the south side of El Monte Road are linked to the south-facing slope on the north side of Willow Road via the vegetated project area. The hills to the south of El Monte Road are covered mainly in grassland and sparse chaparral vegetation, while the south-facing slopes to the north of Willow Road possess high-quality scrub habitat. The region on the north side is connected to larger, relatively undisturbed regions of abundant coastal sage scrub. The region within the recognized linkage area between the riparian area immediately south of Willow Road in the middle of the project area and to the east of Hanson Pond currently consists of disturbed

habitat and non-native grassland. Because habitats such as non-native grassland generally do not offer the types of dense vegetation cover preferred by large animals for safe passage between native habitats, the effectiveness of the area as a viable north-south habitat linkage could be improved by revegetation by converting non-native, structurally limited vegetation to native scrub vegetation.

The project may temporarily affect east-west wildlife movement along the existing river channel during excavation; however, wildlife would be able to move along the undeveloped upland setback of 150 to 300 feet that would be established along the northern and southern project boundaries. In addition, since excavation would occur in four phases, north-west movement would not be significantly impeded. Further, once the excavation has been completed, the majority of the mining area would be reclaimed and revegetated. Upon completion, the project will provide an east-west linkage of more than 1,000 feet in width, with higher quality habitat. Approximately 178 acres of the project site will be conserved by a biological open space easement, providing habitat for wildlife movement in perpetuity. Therefore the project meets the County's criterion to identify and protect existing movement corridors.

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

The San Diego River corridor represents a local habitat linkage in the County. Portions of the project site where active mining operations are occurring may temporarily interfere with the corridor in an east-west direction. The project will result in temporary impacts to vegetative cover and will lower the valley floor through mineral extraction. These impacts would be limited to a small portion of the project area at any given time as the project would proceed in four phases and most of the project area will be available for wildlife movement while each phase is mined. Mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement of habitats. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. Mitigation measures will eventually result in higher quality habitat that provides long-term improved vegetative cover. Therefore the project meets the County's criterion to protect the project site's vegetative and/or topographic cover over the long-term.

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 is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCA; however the San Diego River corridor represents a local habitat linkage in the County. The site also offers function of a north-south corridor across the western portion of El Monte Valley, including access to Lake Jennings. The riparian vegetation surrounding and within the river floodplain includes thick to sparse stands of both native willow and cottonwood communities and non-native tamarisk scrub, which functions to a limited extent as a feasible habitat for smaller species such as passerine birds, rodents and reptiles, as well as larger species such as mule deer or bobcats. The densest regions of riparian scrub habitats are bordered by generally open areas of non-native grassland, or otherwise open and disturbed vegetation. Most of the outskirts of the project area abut fenced residential

and agricultural developments that likely constrict wildlife use to some degree or direct larger animals longitudinally across the project area.

Portions of the project site where active mining operations are occurring may temporarily interfere with the existing local linkages. These impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases. Most of the project area will be available for wildlife movement while each phase is mined. Mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement of habitats. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. These mitigation measures will eventually result in higher quality habitat. Therefore the project meets the County's criterion to maintain regional linkages suitable for a wide range of species.

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.**

   The project is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCA; however the San Diego River corridor represents a local habitat linkage in the County. Portions of the project site where active mining operations are occurring may temporarily interfere with the existing local linkages. These impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases. Most of the project area will be available for wildlife movement while each phase is mined. Mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement of habitats. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. These mitigation measures will eventually result in higher quality habitat. Therefore the project meets the County's criterion to maintain long-term habitat linkages of adequate width.

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 may temporarily affect east-west wildlife movement along the existing river channel during excavation. However, during construction, wildlife would be able to move along the undeveloped upland setback of 150 to 300 feet that would be established along the northern and southern project boundaries. In addition, since excavation would occur in four phases, north-west movement would not be significantly impeded. Further, once the excavation has been completed, the majority of the mining area would be reclaimed and revegetated. Upon completion, the project will provide an

east-west linkage of more than 1,000 feet in width, with higher quality habitat. Approximately 178 acres of the project site will be conserved by a biological open space easement, providing habitat for wildlife movement in perpetuity. Although narrow, east-west corridors will be created temporarily during mining operations, the project will provide long-term conservation of habitat linkages.

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.**

   Portions of the project site where active mining operations are occurring may temporarily interfere with visual continuity of the existing local linkages. These impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases. Once the project area has been completed and revegetated, there would be no obstructions to line-of-sight as there are no permanent structures that would prevent visual continuity within wildlife corridors or linkages. Therefore the project will maintain long-term visual continuity within movement corridors.

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

   Noise and vibrations from construction and mining machinery will occur during mining operations, soil excavation, vehicle ingress and egress, and brush-removal, which have the potential to indirectly affect wildlife movement in the vicinity of the project area during the day. Although there would be no mining operations during the night, nighttime lighting would be installed for safety reasons. The lighting will be shielded and designed to minimize glare and reflection. The project will result in temporary lighting and noise impacts; however these impacts will cease when mining operations cease.

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.**

   A temporary dirt haul road will be constructed for the purpose of providing site access during mining operations. The haul road will be removed in phases as each mining phase is completed and the associated area revegetated/reclaimed. The entirety of the road will be removed upon completion of mining operations (approximately 12 years). Therefore the project meets the County's criterion to minimize barriers such as roads.

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.

A temporary dirt haul road will be constructed for the purpose of providing site access during mining operations. The haul road will be removed in phases as each mining phase is completed and the associated area revegetated/reclaimed. The entirety of the road will be removed upon completion of mining operations (approximately 12 years). Therefore this criterion does not apply.

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.**

    Portions of the project site where active mining operations are occurring may temporarily interfere with continuous corridors. However, construction impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases. During construction, wildlife will be able to move along the undeveloped upland setback of 150 to 300 feet established along the northern and southern project boundaries. Following mining operations, habitat will be reclaimed, restored, and enhanced to create a continuous long-term corridor through the project site. Since a continuous corridor will be maintained long-term, this criterion does not apply.

IV. Subarea Plan Findings

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

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

   The proposed project would result in 39.18 acres of temporary impacts and 2.28 acres of permanent impacts to State waters and associated riparian habitat, and County of San Diego Resource Protection Ordinance (RPO) wetlands (41.46 acres total); however the project is exempt from the RPO under Section 86.605(d), which provides an exemption for sand, gravel, and mineral extraction projects if certain mitigation measures are met. No federal or state protected wetlands will be impacted.

   As a note, unavoidable impact will occur to approximately 0.01 acre of permanent impacts and 0.35 acre of temporary impacts to non-wetland waters of the U.S./State (USACE/RWQCB); 0.36 acres total. In permitting projects, the USACE (and CDFW) seeks to meet the goal of no net loss of functions and values of wetlands and often other waters of the United States and would require at a minimum the restoration of disturbed areas to original contours and a revegetation program to restore jurisdictional areas disturbed by the proposed project. Implementation of mitigation measures, such as reclamation, restoration, and enhancement would reduce the direct impacts to jurisdictional wetlands and/or riparian habitats as defined by USACE to less than significant. Therefore the project meets this criterion to maintain a “no net loss” of wetlands standard.

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 has been designed to focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat. Impacts will also occur to tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III). Impacts will occur to 4.0 acres of native sensitive habitats, which include southern willow scrub (0.12 acres, Tier I), non-vegetated channel (0.36 acres), and Diegan coastal sage scrub (3.6 acres, Tier II). The mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, and a 50-foot buffer will not be directly impacted by the project. Additionally, mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement. Tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to native habitats through this mitigation for the majority of the project site. These mitigation measures would eventually result in higher quality habitat that can serve as a long-term improved habitat structural diversity post mining. A significant portion of the project site will be placed within a biological open space easement upon completion of the mining operations. Therefore the project meets the County's criterion of maximizing the habitat structural diversity of habitat areas to be conserved post mining.

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

   The Habitat Evaluation Model identifies the riparian area along the river corridor as having high and very high biological value, surrounded by predominantly agricultural lands and scattered patches of low and moderate habitat value areas. Approximately 6.8 acres of the 10.4 total acres of Diegan coastal sage scrub habitat on site and the entire 7.0 acres of mature riparian woodland, dominated by southern cottonwood-willow riparian forest (Tier I) will not be directly impacted by the project. The remaining high and very high value riparian area, dominated by tamarisk scrub habitat, would be impacted by the project. Mitigation for temporal impacts associated with mining operations will be provided through reclamation, revegetation, and enhancement of habitat. Reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats. These mitigation measures would eventually result in higher quality habitat. Approximately 178 acres of the project site will be placed within a biological open space easement upon completion of the mining operations. Therefore, through mitigation, the project meets the County's criterion to provide for the conservation of spatially representative high and very high value habitats over the long-term.

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.**

   Mining activities will be phased in four stages with reclamation and restoration to occur immediately following completion of each mining phase. As a result, the area of temporary impact will be contained within a relatively small portion of the property at any given time. Once the excavation has been completed, the majority of the mining area would be reclaimed and revegetated. These mitigation measures would eventually result in higher

quality habitat post mining operations. A significant portion of the project site will be conserved within a biological open space easement in perpetuity following project completion. Permanent impacts will consist of a drop structure at the eastern end of the impacted area, fuel modification zone areas adjacent to existing development areas, and a trail system and associated staging areas for recreational use consistent with the County's Community Trails Master Plan. Therefore, the project meets the County's criterion to create significant blocks of habitat to reduce long-term edge effects.

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

The project will focus impacts within areas that are dominated by disturbed (126.0 acres, Tier IV) habitat. Impacts will also occur to tamarisk scrub (41.8 acres, an invasive habitat considered Tier I due to its location within a riparian area) and non-native grassland (86.8 acres, Tier III). Impacts will occur to 4.0 acres of other sensitive habitats, which includes southern willow scrub (0.12 acres, Tier I), non-vegetated channel (0.36 acres), and Diegan coastal sage scrub (3.6 acres, Tier II). The entirety of the mature riparian woodland (7.0 acres, Tier I), dominated by southern cottonwood-willow riparian forest, including a 50-foot buffer will not be directly impacted by the project. Mitigation for temporal impacts to sensitive habitats will occur through reclamation and restoration of tamarisk scrub, disturbed lands, and non-native grassland. These habitats will be up-tiered to southern cottonwood-willow riparian forest, southern willow scrub, non-vegetated channel, and Diegan coastal sage scrub habitats, eventually resulting in higher quality habitat. Therefore the project meets the County's criterion to minimize impact to habitat.

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 provide for the conservation of key regional populations of covered species or representations of sensitive habitats because no key regional populations of covered species occur on site; however, one covered plant species, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*), is known to occur on-site. One individual of this species was observed outside of the Major Use Permit boundary and will not be directly impacted by the project. Since only one shrub was found, this occurrence is not considered to be a key regional population. Six sensitive wildlife species covered by the South County MSCP were observed during field surveys, including coast horned lizard (*Phrynosoma blainvillii*) orange-throated whiptail (*Aspidoscelis hyperythrus*), Cooper's hawk (*Accipiter cooperii*), coastal California gnatcatcher, western bluebird (*Sialia mexicana*), least Bell's vireo (*Vireo bellii pusilus*). The project would result in temporary loss of habitat to where active mining operations are occurring. These impacts will be limited to a relatively small portion of the project area at any given time as the mining operations proceed in four phases. Most of the project area will be available for wildlife use during each phase. Once the excavation has been completed, the majority of the mining area will be reclaimed and revegetated in order to mitigate for temporal impacts. These mitigation measures will eventually result in higher quality habitat for covered species. Therefore the project meets the County's criterion to provide for the conservation of covered species and representations of sensitive habitats.

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.

The project is located within the Lake Jennings/Wildcat Canyon BRCA, which is part of a large interconnecting block of habitat. The riparian vegetation surrounding and within the river floodplain includes thick to sparse stands of both native willow and cottonwood communities and non-native tamarisk scrub, which functions to a limited extent as a feasible habitat for smaller species such as passerine birds, rodents, and reptiles, as well as larger species such as mule deer and bobcats. Golden eagle was not observed but is considered to have a high potential to use the site for foraging. The project will result in temporary loss of 226.6 acres of habitat and permanent loss of 35.9 acres of habitat. Mitigation for temporal impacts will be provided through reclamation, revegetation, and enhancement immediately following mining operations and will be implemented across the majority of the project site upon project completion. With mitigation, the project will eventually result in higher quality habitat and contribute to the conservation of large blocks of habitat. Therefore, the project meets this criterion.

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

The project site does not contain critical populations of sensitive plant species as identified in the BMO (Attachment C). The project site contains one narrow endemic plant species, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) (BMO, Attachment E). One individual Palmer's goldenbush was observed outside of the Major Use Permit boundary and will not be directly impacted by the project. One narrow endemic animal species, least Bell's vireo was observed within the biological study area, and one narrow endemic species, golden eagle has potential to use the site for foraging (BMO Attachment D). The site contains USFWS designated critical habitat for arroyo toad, a narrow endemic species; however presence of arroyo toad is considered unlikely due to habitat conditions on site. The project would result in temporary loss of habitat where active mining operations are occurring. These impacts will be limited to a relatively small portion of the project area at any given time as mining operations proceed in four phases. Most of the project area will be available for wildlife use during each phase. Once the excavation has been completed, the majority of the mining area will be reclaimed and revegetated in order to mitigate for temporal impacts, eventually resulting in higher quality habitat for narrow endemic species. Therefore the project meets this criterion over the long term.

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

Mining activities will be phased in four stages with reclamation and restoration to occur immediately following completion of each mining phase. As a result, the area of temporary impact will be contained within a relatively small portion of the property at any given time. Permanent impacts to 35.9 acres will occur, consisting of a drop structure at the eastern end of the mining area, fuel modification zone areas adjacent to existing development, and a trail system and associated staging areas for recreational use consistent with the County's Community Trails Master Plan. Once the excavation has been completed, the majority of the mining footprint will be reclaimed and revegetated eventually resulting in

higher quality habitat. Approximately 178 acres of the project site will be conserved within a biological open space easement, providing habitat upon project completion. Therefore, the project will not jeopardize the possible or probably assembly of a preserve system within the Subarea Plan.

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

Mining activities will be phased in four stages with reclamation and restoration to occur immediately following completion of each mining phase. As a result, the area of temporary impact will be contained within a relatively small portion of the property at any given time. Mitigation for temporal impacts will be provided through reclamation, revegetation and enhancement of the majority of the project site. These mitigation measures would eventually result in higher quality habitat long-term post mining operations. A significant portion of the project site will be conserved within a biological open space easement in perpetuity following project completion. Permanent impacts to 35.9 acres will consist of a drop structure, fuel modification zone areas adjacent to existing development areas, and a trail system and associated staging areas for recreational use consistent with the County's Community Trails Master Plan. Therefore, the project meets the County's criterion to create significant blocks of habitat to reduce long-term 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.

Mining activities impacting a total of approximately 262.3 acres will be phased in four stages, each with an impact area ranging from 47.6 acres to 76.8 acres. Reclamation and restoration to occur immediately following completion of each mining phase. As a result, the area of temporary impact will be contained within a relatively small portion of the property at any given time. The project may temporarily affect east-west wildlife movement along the existing river channel during excavation. However, during construction, wildlife will be able to move along the undeveloped upland setback of 150 to 300 feet that would be established along the northern and southern project boundaries.

One single individual of a narrow endemic plant species, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) was observed outside of the Major Use Permit boundary and will not be directly impacted by the project. Six sensitive wildlife species covered by the South County MSCP were observed during field surveys, including coast horned lizard (*Phrynosoma blainvillii*) orange-throated whiptail (*Aspidoscelis hyperythrus*), Cooper's hawk (*Accipiter cooperii*), coastal California gnatcatcher, western bluebird (*Sialia mexicana*), least Bell's vireo (*Vireo bellii pusilus*). The project would result in temporary loss of habitat where active mining operations are occurring. These impacts will be limited to a relatively small portion of the project area at any given time. Once the excavation has been completed, the majority of the mining area will be reclaimed and revegetated in order to mitigate for temporal impacts. These mitigation measures will eventually result in higher quality habitat for covered species.

Mitigation for temporal impacts will be provided through 112.5 acres of reclamation, 113.9 acres of restoration, and 64.2 acres of enhancement, which consists of approximately 290.6 acres (over 60%) of the 479.5-acre project site. These mitigation measures would eventually result in higher quality habitat following mining operations. Approximately 178

acres of the project site will be conserved by a biological open space easement, providing habitat for wildlife movement in perpetuity following project completion. Permanent impacts to 35.9 acres will consist of a drop structure, fuel modification zone areas adjacent to existing development areas, and a trail system and associated staging areas for recreational use consistent with the County's Community Trails Master Plan. Therefore, through reclamation, restoration, and enhancement of the majority of the project site, the project meets the County's criterion to avoid long-term impacts to BRCA, to sensitive resources and to specific sensitive species.

Kimberly Smith, Planning & Development Services

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MSCP Designation For

El Monte Sand Mine Project
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