

**FINDINGS OF CONFORMANCE
MULTIPLE SPECIES CONSERVATION PROGRAM
For El Monte Trail and Equestrian Staging Area**

February 12, 2009

I. Introduction

The proposed El Monte Trail and Equestrian Staging Area project (project) consists of the construction of a multi-use trail (equestrian, hikers, and bikers) and equestrian staging area within El Monte County Park (Park). The 88-acre Park is located approximately 3.5 miles north of Lakeside and north of the unincorporated township of Blossom Valley. The project site is situated east of State Route 67 (SR-67) and is accessible via El Monte Road.

The County is proposing to construct a 1.4-acre equestrian staging area located on a disturbed, former ball field immediately northwest of El Monte Road. The staging area will be unpaved and will include a natural substrate parking area. A multi-use trail will connect the proposed staging area to the Park east of El Monte Road via an existing road crossing. Another portion of the trail will roughly parallel El Monte Road, extend northeast to southwest for a short distance then turn eastward, ascending the slope located along the southern boundary of the Park to connect with an existing trail southeast of the Park.

The proposed trail will be two- to four-feet wide and the trail surface will remain native soil and/or rock. It will extend approximately one mile east of the staging area, including proposed switchbacks, and will provide the appropriate cross gradient to require minimal switchbacks. The portion of the proposed trail that extends along El Monte Road will be located along the Park fence line. The existing fence does not encompass the entire Park property and will be repositioned to accommodate the new trail. An existing backstop on the former ball field will be removed within the proposed staging area, and fencing will be installed along the east and north boundaries of the proposed staging area.

The Park is situated on the outer floodplain of the upper San Diego River and on steep north- and south-facing slopes to the south. It is bordered by El Capitan Mountain and the El Capitan Reservoir to the east, portions of the El Capitan Open Space Preserve to the north and west, and sparse residential development to the southwest. Elevations within the Park range from approximately 900 feet above mean sea level (AMSL) to nearly 1,600 feet AMSL.

The Park is characterized by a broad, wooded floodplain area backed by steep slopes in the central and southern portions of the Park. The low-lying areas support disturbed habitat and sparse coastal sage scrub interspersed with dense coast live oak riparian woodland. The lower portion of the Park near El Monte Road is level and has been fenced and developed with paved areas, buildings and restroom facilities, picnic shelters and playgrounds located under and among well spaced, mature coast live oaks. The north-facing slope immediately south of the developed Park areas is dominated by oak woodland

trending to chaparral near the east boundary of the Park. The adjacent ridgeline and south-facing slope are dominated by coastal sage scrub.

The direct project impact area is limited to the footprint of the proposed staging area and trail. The proposed trail alignment will impact 0.66 acre of Diegan coastal sage scrub. The proposed staging area will impact approximately 1.4 acres of disturbed habitat. In addition, a total of 0.12 acre of developed lands, consisting of an existing parking area, also occurs within the impact area for the project. Direct impacts to coastal sage scrub will be mitigated at a 1.5:1 ratio and will consist of on-site restoration of 1.0 acre of disturbed habitat to coast live oak woodland as detailed in the Mitigated Negative Declaration (MND) and Initial Study (IS).

Special status plant species observed within the project survey areas included San Diego sunflower (*Viguiera laciniata*), California black walnut (*Juglans californica*) and Engelmann oak (*Quercus engelmannii*). Impacts to these species will be avoided through site-specific project design. Special status wildlife species observed or detected within the survey area include turkey vulture (*Cathartes aura*) and southern mule deer (*Odocoileus hemionus*). Additional List A, B and C rare plants and County Group I and II wildlife species have potential to occur within the project area, but were not observed.

The undeveloped areas of the 88-acre Park, including the proposed project area, are located within pre-approved mitigation areas. The proposed trail and staging area will be managed in accordance with a Resource Management Plan that includes Area Specific Management Directives, to be prepared by the County, in order to mitigate potentially significant impacts that could occur to sensitive wildlife through loss of habitat, increased human access or competition from domestic animals, and decreased nesting success. In addition, the County proposes to fence the staging area.

Additionally, in order to mitigate potentially significant impacts to nesting success of wildlife species, vegetation clearing or grading shall be restricted during the bird breeding season (February 1 to August 15 annually) unless pre-construction surveys by a qualified biologist determine no nesting birds or raptors would be impacted by the proposed work. If active nests are identified within the impact area, vegetation clearing activities shall not occur within 300 feet of active bird nests, 500 feet of tree-nesting raptor nests, and 800 feet of ground-nesting raptor nests until either the breeding season has ended or the nest is no longer active.

The proposed project will not result in significant impacts to jurisdictional wetlands or waterways. An intermittent, non-wetland waters of the U.S. (WOUS) (the main channel of the upper San Diego River) occurs to the north of the proposed staging area, but a vegetated wetland buffer of over 300 feet would be maintained. The proposed project will not result in significant impacts to wildlife corridors and linkages due to the limited extent of the impacts proposed within the Park.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Southern Coast Live Oak Riparian Woodland	Tier I	12.9	0	2:1	n/a
Live Oak Woodland	Tier I	20.2	0	2:1	n/a
Diegan Coastal Sage Scrub	Tier II	29.2	0.7	1.5:1	1.0*
Disturbed Habitat	Tier IV	3.4	1.4	n/a	n/a
Developed	Tier IV	22.1	0.1	n/a	n/a
Total:	--	87.8	2.2	--	1.0

*Required coastal sage scrub (Tier II) mitigation acreage will be up-tiered to coast live oak woodland (Tier I)

The findings contained within this document are based on County records, staff field site visits and the Biological Resources Letter Report for the El Monte Regional Park Project, dated July 7, 2008 prepared by ICF Jones & Stokes Associates, Inc. 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 Game and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County’s Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

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

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

The project site is located within both developed and undeveloped portions of El Monte County Park. The Park was considered a baseline preserve in the MSCP preserve system, and is contiguous to the Blossom Valley Habitat Conservation Area which is preserved habitat within a MSCP pre-approved mitigation area.

Additionally, the project site is located both within and adjacent to areas of land shown as pre-approved mitigation area on the wildlife agencies' pre-approved mitigation map. Therefore, the project impact area qualifies as a BRCA pursuant to BRCA criteria 86.506(a)(1)(i) and (ii).

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

Mitigation for project related impacts will consist of on-site habitat restoration adjacent to a wetland buffer. The proposed mitigation site is located within an area of land shown as preapproved mitigation area on the wildlife agencies' preapproved mitigation map. Therefore, the project impact area qualifies as a BRCA pursuant to BRCA criteria 86.506(a)(1)(i).

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 proposed project includes the construction of a trail linkage within the southern portion of the Park and one staging area in the northwest area of the Park. The proposed trail alignment was sited to provide the appropriate cross gradient to require minimal switchbacks and will avoid impacts to sensitive plant species found onsite. The proposed staging area has been reduced in size from 2.5 to 1.4 acres and is sited within a disturbed former ball field area of the Park to avoid impacts to sensitive habitats and will maintain an existing vegetated wetland buffer of over 300 feet. Additionally, proposed mitigation alongside the wetland buffer will restore disturbed habitat to coast live oak woodland providing additional ecologically valuable habitat onsite.

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

Clustering is not proposed for this project. The proposed project is for the development of a multi-use trail and equestrian staging area, and does not include residential development. Therefore, clustering does not apply.

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 proposed trail alignment in the southern portion of the Park will traverse steep slopes, however, development of trails for passive recreational use (according to park approved plans) is allowed on steep slope lands by the Resource Protection Ordinance. The proposed trail and staging area will be managed in accordance with a Resource Management Plan that will be prepared by the County. Additionally, no substantial grading is proposed and the trail alignment has been sited to be the least environmentally damaging by avoiding sensitive species and providing the appropriate cross gradient to require minimal switchbacks.

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

Existing access to the project site is provided by El Monte Road. The project does not propose any new external roads or access road improvements, only internal driveways within the equestrian staging area. A trail will connect the proposed staging area to the Park east of El Monte Road via an existing road crossing.

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).

Please refer to Sections B and C below for compliance rationale.

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.

El Monte Park contains intermittent jurisdictional waters located along the north Park boundary which consist of the main low-flow channel of the San Diego River approximately two miles downstream of the El Capitan Reservoir. However, the project will maintain an existing vegetated wetland buffer of over 300-feet and will not impact jurisdictional wetlands or riparian habitat.

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

The portion of the trail within the undeveloped areas of the Park has been designed to follow natural contours and will avoid impacts to sensitive plant species. The two- to four-foot wide trail will require minimal grading and will be surfaced with native soil and rock. Unavoidable impacts, totaling 0.66 acre, to Tier II coastal sage scrub habitat associated with this portion of the trail will be mitigated for by on-site habitat restoration of disturbed habitat to Tier I habitat (coast live oak woodland) at a ratio of 1.5:1. The 1.0-acre mitigation site will be contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which will be maintained on-site thereby adding to the conserved habitat on-site.

In addition, a small portion of the proposed trail winds through 0.03 acre of coast live oak woodland. However, construction of the trail would not remove or otherwise affect oak trees or oak tree recruitment as trail impacts are considered minimal and all work through coast live oak woodland will be achieved by hand. Therefore, no significant impacts to coast live oak woodland will result from trail construction or use.

The remainder of the trail and staging area were sited within developed or disturbed areas which have limited ecological value due to lack of natural habitat elements. The southern coast live oak riparian woodland and coastal sage scrub habitat found within the Park along the San Diego River north of El Monte Road are not proposed for any future Park development, and this project will completely avoid these 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.

The majority of the 29.2 acres of Diegan coastal sage scrub habitat onsite exists on the south-facing slopes in the southern half of the Park which is contiguous with protected coastal sage scrub habitat and other high quality lands. However, two smaller areas of coastal sage scrub habitat, totaling 5.4 acres, occur on either side of the San Diego River north of El Monte Road. The 0.66 acre of impacts associated with the proposed trail will only occur within the larger concentrated area of coastal sage scrub, and the two smaller areas in the northern portion of the park will be conserved in their entirety.

A small portion of the proposed trail winds through 0.03 acre of coast live oak woodland. However, construction of the trail would not remove or otherwise affect oak trees or oak tree recruitment as trail impacts are considered minimal and all work through coast live oak woodland will be achieved by hand.

Therefore, no significant impacts to coast live oak woodland will occur. The project also proposes onsite mitigation within the Park north of El Monte Road in the form of habitat restoration of disturbed habitat to coast live oak woodland, thereby increasing the overall acreage of this habitat onsite. Additionally, the southern coast live oak riparian woodland habitat found within the Park along the San Diego River north of El Monte Road is not proposed for any future Park development, and this habitat type will be conserved in its entirety.

- 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.**

The project is for the construction of a multi-use trail and staging area for public access and passive recreation only, and does not propose any other development or structures within the Park. The undeveloped portion of the Park is considered a MSCP preserve, and the proposed multi-use trail and staging area are compatible with the "Public Access and Recreation" land uses allowed within the preserve as specified in Section 1.9.2 of the Subarea Plan. The proposed trail and staging area will be primitive with no amenities provided, therefore, impacts will be minimal and the project will maintain the integrity of the habitats within the Park.

Edge effects will be reduced by both project design and proposed mitigation. The project will not support any noise-generating equipment or artificial lighting. Human disturbance will be limited to passive recreational use of the trail and staging area by equestrians, hikers, and bikers. The trail and staging area will be managed in accordance with a Resource Management Plan being prepared by the County, which will include means, such as construction of fence segments and installation of signs, to prevent impacts resulting from increased human use of the site or competition from domestic animals.

In order to mitigate for the 0.66 acre of impacts to coastal sage scrub, 1.0 acre of disturbed habitat will be restored to coast live oak woodland. The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which are not proposed for any future Park development, and will be conserved in their entirety. Thus, the restoration of this area will increase the size of the conserved area maximizing the ratio of surface area to the perimeter of conserved habitats on-site and reducing edge effects.

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

The project has been designed to focus development of the 1.4-acre staging area within a previously disturbed former ball field area of the Park to avoid impacts to sensitive habitat areas on site including southern coast live oak riparian woodland (Tier I) and live oak woodland (Tier I). The proposed trail winds through both developed and disturbed habitat, as well as coast live oak woodland and coastal sage scrub habitat, however no significant impacts to coast live oak woodland will occur and the project will solely impact 0.66 acre of coastal sage scrub (Tier II). Therefore, the project provides for the development of the least sensitive habitats.

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

The Biological Resources Letter Report prepared by ICF Jones & Stokes Associates, Inc. and dated July 7, 2008 concluded that no critical or narrow endemic plant or animal species were detected or are expected to occur on the site. Therefore, this project will not impact narrow endemic species.

7. Preserve the biological integrity of linkages between BRCAs.

The project will not affect the biological integrity of linkages between BRCAs. Project impacts will be limited to a fenced 1.4-acre unpaved staging area and approximately one mile of native substrate trail up to four-feet wide. As presented previously, proposed project impacts in the Park include 0.66 acre of coastal sage scrub, and 1.52 acres of disturbed/developed lands (1.4 acres impacted by the staging area; 0.12 acre impacted by the proposed trail). These impacts would not impact wildlife mobility, breeding or reproduction. These limited impacts also would not prevent or interfere with connectivity to adjacent preserve areas in the Cleveland National Forest, the El Capitan Open Space Preserve or adjacent lower reaches of the San Diego River.

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

No impacts are proposed to any species located on Table 3-5. Approximately 0.66 acre of coastal sage scrub habitat (Tier II) will be impacted and mitigated for at the required 1.5:1 ratio through on-site restoration of 1.0 acre of disturbed habitat to coast live oak woodland (Tier I). In addition, brushing, clearing and/or grading will be restricted during California gnatcatcher and tree-nesting raptor breeding season (February 1 to August 15) though neither species were observed during site surveys.

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 Park is located in a relatively undeveloped area of San Diego County and abuts large preserve areas such as the Cleveland National Forest and the El Capitan Open Space Preserve. The Park occurs within the east–west trending upper San Diego River valley which provides local movement for a wide range of wildlife including mule deer, coyote, bobcat, and mountain lion. Consequently, though the Park is located adjacent to developed land, it also may be considered to be adjacent to a core area or regional linkage of importance. The limited impacts associated with the proposed project would not affect the viability of these core habitat areas. The proposed staging area exists within a former ball field that has been subjected to repeated disturbance and is currently fenced on two sides, and the proposed trail would not prevent or significantly alter wildlife movement into or through these core areas or the Park.

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

The project will not affect existing movement corridors within linkages. Project impacts will be limited to a fenced 1.4-acre unpaved staging area and approximately one mile of native substrate trail up to four-feet wide. As presented previously, proposed project impacts in the Park include 0.66 acre of coastal sage scrub, and 1.52 acres of disturbed/developed lands (1.4 acres impacted by the staging area; 0.12 acre impacted by the proposed trail). These impacts would not impact wildlife mobility, breeding or reproduction. These limited impacts also would not prevent or interfere with connectivity to adjacent preserve areas in the Cleveland National Forest, the El Capitan Open Space Preserve or adjacent lower reaches of the San Diego River. The project would not result in any significant impacts to wildlife corridors or linkages.

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

The project will not affect corridors with good vegetative and/or topographic cover. Project impacts will be limited to a fenced 1.4-acre un-paved staging area and approximately one mile of native substrate trail up to four-feet wide. As presented previously, proposed project impacts in the Park include 0.66 acre of coastal sage scrub, and 1.52 acres of disturbed/developed lands (1.4 acres impacted by the staging area; 0.12 acre impacted by the proposed trail). The ridgeline and south-facing slope dominated by coastal sage scrub was burned up to the ridgeline in the 2003 Cedar Fire and is regenerating with native vegetation. The corridors and topography onsite will remain relatively unchanged as a result of this project.

- 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.**

Project design features and mitigation measures have been proposed to reduce potential impacts to biological resources to less than significant. The limited impacts associated with the proposed project would not affect the viability of regional linkages, which will be maintained for wildlife and resident wildlife populations.

- 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.**

Project design features and mitigation measures have been proposed to reduce potential impacts to biological resources to less than significant. The limited impacts associated with the proposed project would not affect the viability of wildlife linkages or their 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.**

Project design features and mitigation measures have been proposed to reduce potential impacts to biological resources to less than significant. The limited impacts associated with the proposed project would not affect the viability of corridors, or their length and width.

- 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 proposes a primitive staging area within a disturbed, fenced portion of the Park, and a two- to four-foot wide trail on a hillside that is not expected to be highly visible. The project does not propose any structures or development that would interfere with long lines-of-site; therefore, the existing visual continuity on-site will not be impacted as a result of this project.

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 is for the construction of a trail and staging area and will not support any noise-generating equipment or artificial lighting. Human disturbance will be limited to passive recreational use of the trail and staging area by equestrians, hikers, and bikers. The trail and staging area will be managed in accordance with a Resource Management Plan being prepared by the County, which will include means, such as construction of fence segments and installation of signs, to prevent impacts resulting from increased human use of the site. Additionally, the Park gates are closed daily at sunset, restricting access to the area at night.

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.

Existing access to the project site is provided by El Monte Road. The project does not propose any new external roads or access road improvements, only internal driveways within the equestrian staging area. A trail will connect the proposed staging area to the Park east of El Monte Road via an existing road crossing.

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 construction of any structures or roads, therefore, no wildlife crossings are proposed for this project.

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.

El Monte Park supports continuous corridors and since the project does not propose construction of any structures or roads, and no impacts to continuous corridors will be incurred as a result of the trail and staging area, no archipelago corridors are proposed.

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.

El Monte Park contains intermittent jurisdictional waters located along the north Park boundary which consist of the main low-flow channel of the San Diego River approximately two miles downstream of the El Capitan Reservoir. However, the project will maintain an existing vegetated wetland buffer of over 300 feet and will not impact jurisdictional wetlands or riparian habitat.

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

The portion of the trail within the undeveloped areas of the Park has been designed to follow natural contours and will avoid impacts to sensitive plant species. The two- to four-foot wide trail will require minimal grading and will be surfaced with native soil and rock. Unavoidable impacts, totaling 0.66 acre, to Tier II coastal sage scrub habitat associated with this portion of the trail will be mitigated for by on-site habitat restoration of disturbed habitat to Tier I habitat (coast live oak woodland) at a ratio of 1.5:1. The 1.0-acre mitigation site will be contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which will be maintained on-site thereby adding to the conserved habitat on-site.

In addition, a small portion of the proposed trail winds through 0.03 acre of coast live oak woodland. However, construction of the trail would not remove or otherwise affect oak trees or oak tree recruitment as trail impacts are considered minimal and all work through coast live oak woodland will be achieved by hand. Therefore, no significant impacts to coast live oak woodland will result from trail construction or use.

The remainder of the trail and staging area were sited within developed or disturbed areas which have limited ecological value due to lack of natural habitat elements. The southern coast live oak riparian woodland and coastal sage scrub habitat found within the Park along the San Diego River north of El Monte Road are not proposed for any future Park development, and this project will completely avoid these 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.

The majority of the 29.2 acres of Diegan coastal sage scrub habitat onsite exists on the south-facing slopes in the southern half of the Park which is contiguous with protected coastal sage scrub habitat and other high quality lands. However, two smaller areas of coastal sage scrub habitat, totaling 5.4 acres, occur on either side of the San Diego River north of El Monte Road. The 0.66 acre of impacts associated with the proposed trail will only occur within the larger concentrated area of coastal sage scrub, and the two smaller areas in the northern portion of the park will be conserved in their entirety.

A small portion of the proposed trail winds through 0.03 acre of coast live oak woodland. However, construction of the trail would not remove or otherwise affect oak trees or oak tree recruitment as trail impacts are considered minimal and all work through coast live oak woodland will be achieved by hand. Therefore, no significant impacts to coast live oak woodland will occur. The project also proposes onsite mitigation within the Park north of El Monte Road in the form of habitat restoration of disturbed habitat to coast live oak woodland, thereby increasing the overall acreage of this habitat onsite. Additionally, the southern coast live oak riparian woodland habitat found within the Park along the San Diego River north of El Monte Road is not proposed for any future Park development, and this habitat type will be conserved in its entirety.

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

The project is for the construction of a multi-use trail and staging area for public access and passive recreation only, and does not propose any other development or structures within the Park. The undeveloped portion of the Park is considered a MSCP preserve, and the proposed multi-use trail and staging area are compatible with the "Public Access and Recreation" land uses allowed within the preserve as specified in Section 1.9.2 of the Subarea Plan. The proposed trail and staging area will be primitive with no amenities provided, therefore, impacts will be minimal and the project will maintain the integrity of the habitats within the Park.

Edge effects will be reduced by both project design and proposed mitigation. The project will not support any noise-generating equipment or artificial lighting. Human disturbance will be limited to passive recreational use of the trail and staging area by equestrians, hikers, and bikers. The trail and staging area will be managed in accordance with Area Specific Management Directives being prepared by the County, which will include means, such as construction of fence segments and installation of signs, to prevent impacts resulting from increased human use of the site or competition from domestic animals.

In order to mitigate for the 0.66 acre of impacts to coastal sage scrub, 1.0 acre of disturbed habitat will be restored to coast live oak woodland. The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of

coastal sage scrub and southern coast live oak riparian woodland habitat areas which are not proposed for any future Park development, and will be conserved in their entirety. Thus, the restoration of this area will increase the size of the conserved area maximizing the ratio of surface area to the perimeter of conserved habitats on-site and reducing edge effects.

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

The project has been designed to focus development of the 1.4-acre staging area within a previously disturbed former ball field area of the Park to avoid impacts to sensitive habitat areas on site including southern coast live oak riparian woodland (Tier I) and live oak woodland (Tier I). The proposed trail winds through both developed and disturbed habitat, as well as coast live oak woodland and coastal sage scrub habitat, however no significant impacts to coast live oak woodland will occur and the project will solely impact 0.66 acre of coastal sage scrub (Tier II). Therefore, the project provides for the development of the least sensitive habitats.

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.

Special status plant species observed within the project survey areas included San Diego sunflower (*Viguiera laciniata*), California black walnut (*Juglans californica*) and Engelmann oak (*Quercus engelmannii*). Two sensitive wildlife species were observed or detected within the survey area; southern mule deer (*Odocoileus hemionus*), and turkey vulture (*Cathartes aura*). However, there were no threatened, endangered, narrow endemic or otherwise sensitive plant or wildlife species detected on the project site. Impacts to these species will be avoided through site-specific project design, and the project will be conditioned to prevent any potential disturbance during California gnatcatcher and tree-nesting raptor breeding season.

The potential loss of 0.66 acre of coastal sage scrub (Tier II) will be mitigated on-site at a 1.5:1 ratio through restoration of disturbed habitat to coast live oak woodland (Tier I). The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which are not proposed for any future Park development, and will be conserved in their entirety. On-site mitigation as proposed by the project will contribute to the conservation of large blocks of high quality habitats in the Park as well as other sensitive habitats in a biologically functioning unit.

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.

As stated above, the Park is located adjacent to large preserve areas such as the Cleveland National Forest and the El Capitan Open Space Preserve. These preserve areas are high in habitat value within the County's MSCP. The lands provide habitat for a wide range of wildlife including Golden eagles which are known to occur in the vicinity of the Park (nesting off-site along El Capitan Reservoir), and mule deer which were detected on-site.

The proposed trail and staging area will be primitive with no amenities provided, therefore, impacts will be minimal and the project will maintain the integrity of the habitats within the Park. The proposed project will impact 0.66 acre of coastal sage scrub and will mitigate through the on-site restoration of 1.0 acre of disturbed habitat to coast live oak woodland. The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer, and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which are not proposed for any future Park development, and will be conserved in their entirety. On-site mitigation as proposed by the project will contribute to the conservation of large blocks of habitat for wide-ranging species in the Park.

- 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 Biological Resources Letter Report prepared by ICF Jones & Stokes Associates, Inc. and dated July 7, 2008 concluded that no critical or narrow endemic plant or animal species were detected on the site. Three special status plant species were observed within the project survey areas: San Diego sunflower (*Viguiera laciniata*), California black walnut (*Juglans californica*) and Engelmann oak (*Quercus engelmannii*). Impacts to these species will be avoided through site-specific project design. Lakeside ceanothus (*Ceanothus cyaneus*), a narrow endemic plant species, was identified as having a high potential to occur within the Park, however, this species was not detected within the project footprint and will not be impacted by the proposed project. Therefore, the proposed project is not expected to result in impacts to narrow endemic species or to rare or endangered plants.

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

The project is for the construction of a multi-use trail and staging area for public access and passive recreation only, and does not propose any other development or structures within the Park. The undeveloped portion of the Park is considered a MSCP preserve, and the proposed multi-use trail and staging area are compatible with the "Public Access and Recreation" land uses allowed within the preserve as specified in Section 1.9.2 of the Subarea Plan. The proposed trail and staging area

will be primitive with no amenities provided, therefore, impacts will be minimal and the project will maintain the assembly of the 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.

The project does not propose any on-site preservation of habitat. In order to mitigate for the 0.66 acre of impacts to coastal sage scrub, 1.0 acre of disturbed habitat will be restored to coast live oak woodland. The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which are not proposed for any future Park development, and will be conserved in their entirety. The staging area will be fenced and thus the mitigation area will be separated from the adjacent staging area. Thus, the restoration of this area will increase the size of the conserved area maximizing the ratio of surface area to the perimeter of conserved habitats on-site and reducing 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 project is for the construction of a multi-use trail and 1.4-acre equestrian staging area within El Monte County Park. The project will result in impacts to 0.66 acre of coastal sage scrub and 1.52 acres of disturbed/developed habitat, out of a total of approximately 88 acres of Park land. In accordance with the BMO, impacts to coastal sage scrub will be mitigated at a 1.5:1 ratio and will consist of on-site restoration of 1.0 acre of disturbed habitat to coast live oak woodland. The mitigation site is contiguous to an existing 300-foot vegetated wetland buffer and 18.3 acres of coastal sage scrub and southern coast live oak riparian woodland habitat areas which will be maintained thereby adding to the conserved habitat on-site. The staging area and mitigation area will be separated by a fence reducing potential edge effects associated with staging area use. The other habitat types found on-site, southern coast live oak riparian woodland and coast live oak woodland, will not be impacted.

The site qualifies as a BRCA as the undeveloped portion of the Park was considered a baseline preserve in the MSCP preserve system and the project area is located both within and adjacent to areas of land shown as pre-approved mitigation area. The proposed multi-use trail and staging area are compatible with the "Public Access and Recreation" land uses allowed within the preserve as specified in Section 1.9.2 of the Subarea Plan. To the maximum extent practicable, the project design minimizes impacts to resources on-site by: reducing the staging area from 2.5 to 1.4 acres; siting the staging area within formerly disturbed habitat; aligning the trail to allow for minimal switchbacks; solely impacting Tier II habitat while avoiding impacts to Tier I habitat; and avoiding sensitive species. Additional measures to avoid impacts include construction restrictions during the bird breeding

season and management of the trail and staging area in accordance with Area Specific Management Directives being developed by the County. Therefore, impacts to BRCAs have been mitigated, and impacts to sensitive resources and sensitive species have been minimized as outlined in the BMO.

Megan Hamilton, Department of Parks and Recreation
February 12, 2009