

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT

Sycamore Canyon/Goodan Ranch Preserve Public Access Plan

~~July 2023~~ January 2025

I. Introduction

The Sycamore Canyon/Goodan Ranch County Preserve Public Access Plan Project (proposed project) is located within the 2,847¹-acre Sycamore Canyon/Goodan Ranch County Preserve (Preserve) that is within the Lakeside Community Planning Area of the unincorporated County of San Diego (County), to the northeast of the Marine Corps Air Station Miramar, southeast of the City of Poway, west of State Route (SR) 67, and approximately two miles north of the City of Santee. The Preserve is owned by the County DPR and DPR has added several properties to the Preserve over the last 20 years. These include the Sycamore South and Sycamore North (formerly known as Hagey) properties in 2010-2011; the Southern Parcel in 2013; the 2015 Northern Addition (formerly known as Wu) in 2015, the 2015 Southern Addition (formerly known as Cielo); the San Vicente Connector Parcels, which are east of SR-67, between 2003 and 2018; and the Southern Gap parcels in 2019 and 2020. As new additions to the Preserve, these properties are not currently open to the public, and do not include formalized trails¹.

The Preserve is located in United States Geological Survey 7.5-minute San Vicente Reservoir Quadrangle and within Township 14 South, Range 1 West, Sections 14, 15, 16, 21, 22, 23, 25, 26, 27, 28, 33, 34, and Township 15 South, Range 1 West, Sections 2, 3 and 4. ~~In preparing this report, HELIX established a Study Area encompassing the entirety of the Preserve, and a survey area encompassing the proposed trail segments and a buffer around each segment within the Preserve boundary. The proposed project survey area includes approximately 3.78 miles of new proposed trails, 0.99 mile of potential future trail connections, 4.76 miles of formalization of trails on existing disturbed areas, 5.56 miles of existing formal trails, 6.61 miles of existing access roads, and 7.24 miles of potential closures of existing trails that traverse the entirety of the Preserve (Figure 3, Aerial Vicinity), and includes a survey buffer of a 20 to 100 ft. width that totals approximately 108 acres.~~ The Preserve encompasses the following Assessor's Parcel Numbers: 323-111-04; 324-040-41; 324-040-42; 324-040-46; 324-040-50; 324-041-01; 324-041-02; 324-050-28; 325-020-01; 325-020-03; 325-060-01; 325-060-02; 325-060-03; 325-060-08; 325-060-09; 325-060-14; 325-060-15; 325-060-16; 325-060-25; 326-021-02; 326-050-18; 326-070-01; 325-060-04; 325-060-05; 325-060-06; 325-060-07; 325-060-10; 325-060-11; 325-060-12; 325-060-17; 325-060-18; 325-060-19; 325-060-20; 325-060-21; 325-060-22; 325-060-23; 325-060-24; 324-040-25; 324-040-26; 324-040-27; 324-040-28; 324-040-31; 324-040-32; 324-011-15; 324-070-29; 324-040-07; 324-040-08; 374-030-01; 324-050-05; 324-051-04; 324-051-05; 326-020-23; 326-030-06; and 326-020-07. The Preserve is located approximately 16 miles inland from the Pacific coast and is not located in the Coastal Zone.

¹ Based on San Diego Geographic Information Source (SanGIS) parcel data, the total Preserve acreage is approximately 2,994 acres. However, the official Preserve acreage is 2,847, and the size discrepancy is due to the method in which the County reports acreages for conserved lands, using both Assessor and GIS acreages. Assessor's acreage is the formal unit of measurement the County utilizes internally for real estate acquisitions, accounting, and reporting. However, Geographic Information Systems (GIS) acreage is calculated using data provided by SanGIS. Assessor's and GIS acreage totals can differ as records of the legal acreage of parcels are plotted on paper and then converted into GIS. For consistency, SanGIS data is used in this document when calculating acreage for the Preserve, such as land use, habitat, or vegetation areas, within the Preserve.

The Preserve occurs within the Central Poway/San Vicente Reservoir/North Poway Biological Resource Core Area (BRCA), as identified in the Final Multiple Species Conservation Program (MSCP) Plan (County 1998). The Preserve is located on unincorporated lands within the Metro-Lakeside-Jamul segment of the South County MSCP Subarea Plan (herein referred to as Subarea Plan; Figure 4, *MSCP Designations*) and adjacent to areas designated by the City of San Diego MSCP Subarea Plan as Multi-Habitat Planning Area (MHPA). Within the Subarea Plan subregion, the Preserve occurs within areas identified as Pre-Approved Mitigation Area (PAMA; Figure 4). Sycamore Canyon Preserve is fully owned and managed by the County DPR. Goodan Ranch Preserve is owned jointly by DPR, California Department of Fish and Wildlife (CDFW), the City of Poway, and the City of Santee. DPR is identified as responsible for the management of the properties in coordination with all parties through a Joint Powers Agreement.

The proposed project involves an update of the County's 2013 RMP (County 2013) for the Preserve. The RMP serves as a guidance document to manage and preserve the biological and cultural resources within the Preserve while balancing public access. The RMP provides Management Directives pursuant to the Subarea Plan, Framework Management Plan, and Implementing Agreement, which specify that the County is responsible for managing lands that it owns or acquires within the MSCP Preserve System.

The proposed project also includes an update of the Preserve's Vegetation Management Plan (VMP), and a PAP in support of the RMP. The RMP is a guidance document to manage and preserve the biological and cultural resources within the Preserve and is supported by the VMP and PAP. The VMP provides recommendations for invasive non-native plant species management, habitat restoration, and fire management. The PAP serves as the planning document for the Preserve's multi-use trail system. Proposed activities under the PAP include the retention of existing trails, rerouting or modifications to existing trails, the formal addition of new trails, and restoration of some informal trails or existing impacted areas that are not part of the formal trail system.

The Preserve currently contains publicly accessible multi-use trails and access roads, a ranger station, the Goodan Ranch Staging Area and Rock and Roll Trailhead Parking (#33), the 67 Staging Area, restrooms, and the Sycamore Canyon/Goodan Ranch Visitors Center (Visitors Center). The Visitors Center is home to demonstration and exhibit rooms.

~~The County DPR has added several properties to the Preserve over the last 20 years. These include the Sycamore South and Sycamore North (formerly known as Hagey) properties in 2010 and 2011; the Southern Parcel in 2013; the 2015 Northern Addition (formerly known as Wu) in 2015, the 2015 Southern Addition (formerly known as Cielo) in 2015; the San Vicente Connector parcels east of SR-67 between 2003 and 2018; and the Southern Gap parcels in 2019 and 2020. As new additions to the Preserve, these properties are not currently open to the public, and do not include formalized trails.~~

As detailed in the PAP (RICK Engineering Company 2023), a multi-year effort involving technical analysis and stakeholder outreach was conducted by the County to evaluate existing and potential future public access within the Preserve. The PAP evaluates areas both open and not currently open for public access, including an evaluation of potential future opportunities for public access. The PAP supports the goals and policies outlined in the Community Trails Master Plan (CTMP; County 2005) that includes objectives, policies, goals, implementation strategies, and guidelines for the management and expansion of the recreational trail network throughout the County. In addition, the PAP supports the County's Subarea Plan by allowing for passive recreational uses (trails) within areas and in a manner that does not significantly impact natural resources within the Preserve.

The proposed project's full Study Area includes the entire Preserve. To assess the effects of implementation of the proposed project's PAP trail network, a survey area totaling approximately 108 acres has been identified. This survey area includes a 20- to 100-foot buffer for approximately 29 miles of existing formal trails, existing informal trails, and proposed trails and connections that traverse the entirety of the Preserve. ~~In preparing this report, HELIX established a Study Area encompassing the entirety of the Preserve, and a survey area encompassing the proposed trail segments and a buffer around each segment within the Preserve boundary.~~ The proposed project survey area includes approximately 3.78 miles of new proposed trails, 0.99 mile of potential future trail connections, 4.76 miles of formalization of trails on existing disturbed areas, 5.56 miles of existing formal trails, 6.61 miles of existing access roads, and 7.24 miles of potential closures of existing trails that traverse the entirety of the Preserve (Figure 3, *Aerial Vicinity*), and includes a survey buffer of a 20 to 100-ft. width that totals approximately 108 acres.

Implementation of the proposed project's PAP component would result in approximately 15 miles of trails (including both existing and new trails) dedicated to multi-use routes for hikers, mountain bikers, e-bikers, and horseback riders. The PAP would also maintain existing access roads within the Preserve. The proposed project would include the retention of existing trails, rerouting or modifications to existing trails, the formal addition of new trails, and restoration of some informal trails or existing impacted areas that are not part of the formal trail system.

Specifically, the PAP would provide approximately 3.78 miles of new proposed trails or trail segments, 0.99-mile of potential future trail connections, 4.76 miles of formalization of trails or trail segments on existing disturbed areas, and 5.56 miles of existing formal trails. The formal trail network would therefore increase to 15.09 miles and provide trails dedicated to multi-use routes for hikers, mountain bikers, e-bikers, and horseback riders. The PAP would also maintain 6.61 miles of existing access roads and would plan to close 7.24 miles of existing trails, including informal trails.

The PAP proposes preferred trail routes within the Preserve based on constraints to trails and access points, opportunity destinations, and scenic experiences and routes. Recommendations for trail closures or trail re-routes throughout the Preserve are also provided in the PAP. Although the proposed project survey area includes a 20- to 100-foot survey buffer to provide a large trail corridor and provide flexibility for trail implementation, new trails or trail segments throughout the Preserve would be no more than eight feet wide. While the maximum width of existing trails is 12 feet, the maximum width of proposed trails or trail segments is 8 feet and surface material would consist of decomposed granite/binding agent or suitable native soil; therefore, impacts explained in this BRTR that are expressed in terms of acreage represent the maximum impact that could occur, as some sections of trail may be narrower than the maximum widths.

The proposed trail segments have been designed to follow the County's Preserve Trail Guidelines (County 2018), to support the goals and policies outlined by the Community Trails Master Plan (CTMP; County 2005), and to comply with the Subarea Plan Framework Management Plan (County 2001). The PAP supports the goals and policies outlined by the CTMP, including objectives, policies, goals, implementation strategies, and guidelines for the management and expansion of the recreational trail network throughout the County. The Trans County Trail (TCT), which crosses the northern portion of the Preserve in an east-west direction, was identified in the CTMP as a regional trail, that, once established, will span 110 miles in length and connect Anza-Borrego Desert State Park to Torrey Pines State Natural Reserve. Regional trails have characteristics and conditions that serve a regional function by covering long linear distances, transcending community and/or municipal borders, having State or national significance, or providing important connections to existing parks and open space preserves.

A key objective of the MSCP is to provide public recreation and educational opportunities within the MSCP Preserve System, while providing adequate protection for biological resources. Riding and hiking trails are allowed within appropriate portions of the Preserve to provide passive recreational opportunities for the public. These activities are considered compatible with the biological objectives of the MSCP. In addition, the PAP supports the MSCP by establishing trails and allowing for passive recreational uses (trails) within areas and in a manner that does not significantly impact natural resources within the Preserve.

Per Section 1.5.2 of the Subarea Plan, highly sensitive areas would be protected through the use of natural and artificial barriers. Trails, view overlooks, and staging areas are located or proposed within the least sensitive areas of the Preserve. Trails would be clearly demarcated and monitored for degradation as well as off-trail use.

Per Section 1.9.2 *Public Access and Recreation* of the Subarea Plan, appropriate recreational activities shall be accommodated in concurrence with the goals of the MSCP and Subarea Plan. Per the Subarea Plan, public access and passive recreation are permitted uses within specified areas of the Preserve. Passive recreation includes hiking, scientific research, bird watching, and under specified conditions and locations identified in approved Projects and or management plans, mountain biking, and horseback riding. Equestrian, hiking, and bicycles are allowed when in accordance with approved management plans and if consistent with the Subarea Plan. Other forms of public access and recreation are also allowed per the Subarea Plan if determined to be consistent with the protection of the resources currently existing within the Preserve.

Proposed trails or trail segments consist of new trails or trail segments constructed in previously undisturbed areas, as well as trails or trail segments on existing disturbed areas. Existing disturbed areas generally include informal trails or existing ranch roads that would be formalized into the Preserve trail system by implementation of the PAP component of the proposed project. Formalization of the existing trails on disturbed areas would be compatible with the findings of the Subarea Plan, including the findings in Section 1.9.1, which states: “A. Until all the areas of open space have been dedicated through the processing of maps, there may be a continuation of existing uses within areas shown as Preserve. B. Existing uses shall be allowed to continue, including annual clearing, maintenance and replacement of existing facilities, roads, and structures.” The land within the Preserve was privately held at the time of the creation of the Subarea Plan, and ranch roads were present. Based on historical analysis, some of these areas were impacted prior to the adoption of the Subarea Plan in 1998 or prior to when DPR acquired the property, and are considered disturbed.

The proposed trail segments are designed to address maintenance challenges for existing trail segments that are affected by erosion or other issues, as well as to add new trail alignments that would expand the existing trail network. The new trail segments would follow the standards described in the CTMP (County 2005) and have been designed to follow the County’s Preserve Trail Guidelines (County 2018). In some cases, existing informal trails would be formalized, requiring realignment of segments to follow the standards for the wider rural trail type. The widened trails or trail segments would facilitate continued vehicular maintenance and emergency response access, as well as consistency with the rest of the trail network. Existing trail segments recommended to be closed primarily consist of segments that are unsustainable or would not add significant value to the trail system. Additionally, existing informal trails would be closed in Clark Canyon due to the presence of sensitive species and habitat in that area. The PAP only includes recommendations for implementation of additions or modifications to trails and trail segments within the Preserve. However, the PAP does also include recommendations for potential future trail connections that could link trails within the Preserve to future connections outside the Preserve, should those outside connections become publicly accessible in the future. Potential future trail

connections are noted as such because they do not currently deliver users to approved trails on adjacent properties or are dependent on future acquisitions or actions by other parties. These segments would only be constructed when necessary authorizations have been obtained.

Other improvements include the Rock and Roll Trailhead Parking (#33), which would be located on an existing disturbed area near the center of the Preserve. Rock and Roll Trailhead Parking (#33) would formalize up to 5 parking spaces, one of which will be a van-accessible Americans with Disabilities Act (ADA) space on a concrete pad. The rest of the parking area will be on bladed, compact soil or compacted decomposed granite. The PAP would also maintain access and maintenance roads and add barriers such as fencing within the Preserve to limit human access to sensitive habitats, nesting locations, rare plants, and significant cultural resources. Additional barriers would be necessary for the prevention of access to unauthorized trails, temporary closures due to unsafe conditions, and prevention of vehicular access. Signage would be provided to provide direction and orientation to visitors, display rules and regulations posted at staging areas and access points, provide educational information, and mark trails. The PAP also recommends accessible trails for use by the general public with varying levels of abilities, including consideration of trails that could be compliant with the requirements of the ADA.

The PAP recommends an approximately 21.7-mile trail and access road network that will provide approximately 15.09 miles of multi-use routes for hikers, mountain bikers, e-bikes, and horseback riders and 6.61 miles of access roads. The PAP network would include the following access roads (currently existing), maintenance roads (currently existing), proposed trails and trail segments (including trails within existing disturbed areas), potential future trail connections, and trails and trail segments to be closed for revegetation. Please note that some of the proposed trails discussed below connect to offsite areas that do not have currently authorized trails, for example the Scripps Poway Parkway tunnel. Under the PAP, DPR would allow trails to connect to other legal connections on offsite areas. However, should an access point become unusable for any reason, DPR would close the connection through the use of signage and potentially barriers, as appropriate. Each segment has a designated number and name, as illustrated on Figure 5.

0a - Sycamore Canyon - Access Road

The Sycamore Canyon Access Road is located in the western portion of the Preserve and connects to the Calle de Rob proposed trail segment (#10). The access road generally travels north to south, paralleling the West Boundary Trail segment (#13) and the northwestern Preserve boundary. The majority of the access road is located within existing disturbed habitat.

0b - Sycamore Park Drive – Access Road

Sycamore Canyon Drive is located in the eastern portion of the Preserve, connecting the Preserve to SR-67. The access road generally travels north to south from SR-67 to the proposed Ridge Trail segment (#14). The majority of the access road is located within existing disturbed habitat.

1 – Paragon Mesa – West – Closed to Revegetate

The Paragon Mesa - West trail segment is located in the northwestern portion of the Preserve. The trail travels east to west and connects to the South Raptor Loop (#3) proposed trail segment. This trail segment is proposed to be closed for revegetation. The majority of the trail segment is composed of disturbed habitat.

2 – Paragon Mesa — Informal – Closed to Revegetate

The Paragon Mesa informal trail segment is located in the northern portion of the Preserve. This trail segment is proposed to be closed for revegetation. The majority of the area to be revegetated is composed of chamise chaparral and southern mixed chaparral.

3 – South Raptor Loop – Proposed Trail, Proposed Trail on Existing Disturbed Area, Closed to Revegetate, and Potential Future Trail Connection

The South Raptor Loop proposed trail segment is located in the northern portion of the Preserve and would travel southwest to northeast. The trail segment is primarily located in the 2015 Northern Addition. The trail segment connects to South Raptor Loop - South (#5) trail segment and Paragon Mesa – South (#6) trail segment on the southwest and the southern point of the North Interior Loop (#26) trail segment on the northeast. Portions of the trail segment are proposed to be closed for revegetation; however, the majority of the trail segment proposed to be formalized occurs on existing disturbed areas. There is a portion of the South Raptor Loop trail segment with a potential future trail connection, which would include improvements on an existing trail.

4 – South Raptor Loop Northwest – Potential Future Trail Connection

The South Raptor Loop Northwest potential future trail connection would be located in the northern portion of the Preserve and travel east and west. The trail segment would be entirely located within the 2015 Northern Addition and connect to the middle of the South Raptor Loop (#3) proposed trail segment. The proposed trail segment would be primarily located within an existing trail with improvements proposed, with the surrounding habitat consisting of Diegan coastal sage scrub and coastal sage scrub–chaparral transitional habitat.

5 – South Raptor Loop South – Proposed Trail on Existing Disturbed Area

The South Raptor Loop South proposed trail segment would be located in the northern portion of the Preserve and would enter in the southern portion of the 2015 Northern Addition. The trail segment would generally travel east to west, starting at an intersection with the South Raptor Loop (#3) and Paragon Mesa – South (#6) trail segments. At its eastern end, the South Raptor Loop South trail segment would connect to the proposed South Raptor Loop (#3) trail segment and the South Raptor Loop trail segment’s potential future connection. The South Raptor Loop South, south Raptor Loop Northwest (#4) and South Raptor Loop (#3) trails would connect to form a loop. The majority of the trail is proposed on existing disturbed areas as well as Diegan coastal sage scrub habitat, with improvements proposed.

6 – Paragon Mesa South – Proposed Trail, Proposed Trail on Existing Disturbed Area, and Closed to Revegetate

The Paragon Mesa South proposed trail segment would be located in the northern portion of the Preserve. The trail segment would generally travel north and south, connecting the South Raptor Loop (#3) and South Raptor Loop South (#5) trail segments at the north to the Calle de Rob (#10) proposed trail segments and maintenance road to the south. A small section of the trail segment connecting to Calle de Rob (#10) trail segment would be closed for revegetation. A portion of the trail segment is proposed on existing disturbed areas, with additional portions proposed primarily in Diegan coastal sage scrub. This trail segment is a reroute and extension of the original Paragon Mesa South trail.

7 – Waterfall Trail – Proposed Trail and Potential Future Trail Connection

The Waterfall proposed trail segment and proposed future trail connection would be located in the northern portion of the Preserve, and travels east and west. The Waterfall trail segment would connect to the Paragon Mesa South (#6) trail segment at its eastern end and the Preserve boundary at its western end. The proposed trail segment and potential future trail connection are proposed primarily on existing disturbed habitat, as well as Diegan coastal sage scrub.

8 – Calle de Rob – Maintenance Road

The Calle de Rob Maintenance Road is located in the northwestern portion of the Preserve. The maintenance road travels east and west connecting the Calle de Rob (#9) access road to an existing road outside of the Preserve boundary. The majority of the trail is composed of disturbed habitat.

9 – Calle de Rob – From Access Road to Paragon – Access Road

The Calle de Rob Access Road is located in the northwestern portion of the Preserve. The access road travels northeast and southwest, connecting to the Calle de Rob (#10) proposed trail segment and the proposed section of the TCT (#28a,b) trail. The majority of the trail segment is composed of disturbed habitat.

10 – Calle de Rob – Proposed Trail on Existing Disturbed Area

The Calle de Rob proposed trail segment would be located in the northern portion of the Preserve and enter the northwest corner of the 2015 Southern Addition. The trail would travel east and west, connecting to the Calle de Rob (#9) access road, County TCT (#31) proposed trail, and Paragon Mesa – South (#6) proposed trail segment. The majority of the proposed trail segment is composed of disturbed habitat, with improvements proposed.

11 – Calle de Rob – Eastern Segment; County TCT – Proposed Trail on Existing Disturbed Area

The Calle de Rob – Eastern Segment; County TCT proposed trail segment would be located in the northeastern portion of the Preserve. The trail segment connects to the Sycamore Park Drive (#0b) access road and Connection to Calle de Rob Eastern; County TCT (#11) trail segment. The proposed trail segment would extend southeast to the Preserve boundary. The majority of the proposed trail segment is composed of disturbed habitat, with improvements proposed.

12 – Martha’s Grove – Existing Formal Trail, Proposed Trail, and Closed to Revegetate

Martha’s Grove is an existing trail that extends generally south from the northwest Preserve boundary to the Sycamore Canyon (#0a) access road. A small section at the north end of the trail is proposed to be closed and revegetated. The closed section would be replaced by a new proposed trail segment. The proposed trail segment is located entirely within southern mixed chaparral.

13 – West Boundary Trail – Connects to Stowe Trail Connector – Existing Formal Trail

The West Trail is an existing formal trail and is located in the western portion of the Preserve and connects to the Sycamore Canyon(#0a) and Cardiac Hill (#27) access roads. The existing trail generally travels north

to south, paralleling the Sycamore Canyon access road along the western Preserve boundary. The majority of the trail segment is located within existing disturbed habitat.

14 – Ridge Trail – Existing Formal Trail, Proposed Trail, and Closed to Revegetate

The Ridge Trail is an existing trail located in the western portion of the Preserve. The trail extends northeast from the western Preserve boundary and eventually joins with the Sycamore Park Drive(#0b) access road. A portion of the trail would be closed to be revegetated and would be replaced by a section of proposed trail. The proposed trail segment is primarily located within chamise chaparral and coastal sage–chaparral transitional habitat.

15 – South of Ridge Trail – Proposed Trail, Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate

The South of Ridge Trail segment is a proposed trail segment located in the western portion of the Preserve. The trail segment would extend south from the existing Ridge Trail segment (#14), with improvements proposed. A portion of the trail would be closed to be revegetated and would be replaced by a section of the proposed trail. The proposed trail segment is primarily located within existing chamise chaparral, Diegan coastal sage scrub, and disturbed habitats.

16 – Canyon Trail – Informal – Closed to Revegetate

The Canyon Trail informal trail segment, located in the center of the Preserve, is proposed to be closed for revegetation. The trail segment extends north to south from the Ridge Trail (#14) segment to the Preserve boundary. The closed to revegetate area is primarily located within Diegan coastal sage scrub habitat.

17 – Clark Canyon to Ridge West – Informal – Closed to Revegetate

The Clark Canyon to Ridge West informal trail segment, located in the center of the Preserve, is proposed to be closed for revegetation. The trail segment extends north to south from the Ridge Trail (#14) segment to the Preserve boundary. The closed to revegetate area is primarily located within chamise chaparral and non-native grassland habitat.

18 – Clark Canyon to Ridge East – Informal – Closed to Revegetate

The Clark Canyon Ridge East informal trail segment, located in the center of the Preserve, is proposed to be closed for revegetation. The trail segment extends north to south from the Ridge Trail (#14) segment to the Preserve boundary. The closed to revegetate area is primarily located within southern mixed chaparral and coastal sage–chaparral transition habitat.

19 – North Slaughterhouse – Informal – Closed to Revegetate

The North Slaughterhouse informal trail segment, located in the center of the Preserve, is proposed to be closed for revegetation. The trail segment extends northeast to southwest from the Slaughterhouse Canyon Trail (#21) access road to the Canyon Trail (#16) segment. The closed to revegetate area is primarily located within southern mixed chaparral habitat.

20 – South Slaughterhouse – Closed to Revegetate

The South Slaughterhouse informal trail segment consists of three informal trails located in the southeastern portion of the Preserve that are proposed to be closed for revegetation. The three trails extend southwest from the Slaughterhouse Canyon Trail (#21) segment to the Preserve boundary. The closed to revegetate area is primarily located within southern mixed chaparral habitat.

21 – Slaughterhouse Canyon Trail – Access Road and Existing Formal Trail

Slaughterhouse Canyon Trail segment is an existing access road and formal trail that extends generally south from Sycamore Park Drive (#0b) access road to the southern Preserve boundary. Slaughterhouse Canyon Trail segment is an access road north of the Slaughterhouse Canyon Trail (#24) maintenance road and an existing formal trail segment south of the maintenance road. The existing access road and formal trail segment are primarily composed of disturbed habitat and chamise chaparral habitat.

22 – Rock and Roll Trail — Proposed Trail, Proposed Trail on Existing Disturbed Area, and Closed to Revegetate

The proposed Rock and Roll Trail segment is located near the eastern Preserve boundary. The one-way trail segment would generally extend travel from north to south and connect to Sycamore Park Drive (#0b) or Slaughterhouse Canyon Trail (#21) access roads. Several sections of informal trails are proposed to be closed for revegetation. A proposed trail on existing disturbed area would travel north from the main trail to the edge of the Preserve. At the trail's southern end, one of two options, 22a and 22b, would be chosen. The proposed trail segment is composed primarily of disturbed habitat and Diegan coastal sage scrub habitat.

23 – Sidewinder Rogue Trail – Closed to Revegetate

The Sidewinder Rogue Trail informal trail segment, located in the southwestern portion of the Preserve, is proposed to be closed for revegetation. The trail segment extends east to west, from the South of Ridge Trail (#15) segment, which is also proposed to be closed for revegetation, to the Preserve boundary. The closed to revegetate area is primarily located within chamise chaparral habitat.

24 – Slaughterhouse Canyon Trail – Maintenance Road

The Slaughterhouse Canyon Trail Maintenance Road is located along the eastern boundary of the Preserve near the southern end. The maintenance road extends east from the Slaughterhouse Canyon Trail (#21) and connects to an existing dirt road outside of the Preserve at the Preserve boundary. The maintenance road is composed primarily of disturbed habitat.

25 – Connection to Calle de Rob and Rock and Roll Trail – Potential Future Trail Connection

The Connection to Calle de Rob and Rock and Roll Trail potential future trail connection would be located in the northeastern portion of the Preserve. The potential future trail would travel north and south and is located immediately east of the 2015 Southern Addition and would connect to Calle de Rob – Eastern Segment; County TCT (#11) trail segment to the north. The potential future trail connection would be located primarily within southern mixed chaparral habitat.

26 – Northern Interior Loop – Proposed Trail on Existing Disturbed Area, Potential Future Trail Connection, and Closed to Revegetate

The Northern Interior Loop proposed trail segment would be located in the northernmost portion of the Preserve and would be entirely located within the 2015 Northern Addition. The trail would generally travel north and south, forming a loop and connecting to the South Raptor Loop (#3) and South Raptor Loop South (#5) proposed trail segments. The majority of the trail segment is proposed on existing disturbed areas. There is also a potential future trail connection, which would connect the Northern Interior Loop (#26) trail segment to Scripps Poway Parkway and SR- 67, primarily within Diegan coastal sage scrub. The close to revegetate areas are primarily within non-native grassland habitat.

27 – Cardiac Hill – Access Road

The Access Road – Cardiac Hill is located in the center of the Preserve connecting Sycamore Canyon (#0a) and Sycamore Park Drive (#0b) access roads. The access road connects to an existing dirt road at the western Preserve boundary through the middle of the Preserve. The access road turns into Slaughterhouse Canyon Trail (#21) access road at Sycamore Park Drive access road. The majority of the trail is composed of disturbed habitat.

28 – County TCT; Goodan Staging Area to Access Road and Martha’s Grove to Access Road – Proposed Trails

The County TCT; Goodan Staging Area to Access Road and Martha’s Grove to Access Road proposed trail segments would be located in the northwestern portion of the Preserve along the western boundary of the Preserve. There would be two trail segment options: 28a and 28b. The 28a option would connect from the Calle de Rob – From Access Road to Paragon (#9) access road to the Goodan Ranch Staging Area. The 28b option would connect Martha’s Grove (#12) to the Calle de Rob – From Access Road to Paragon (#9) access road. Only one option would be selected for implementation. The majority of the trail alignment is composed of coastal sage–chaparral transitional habitat within Martha’s Grove (#12) and the Goodan Ranch Staging Area.

29 – Connection to Calle de Rob Eastern; County TCT –Proposed Trail on Existing Disturbed Area

The Connection – Calle de Rob Eastern; County TCT proposed trail segment on existing disturbed area would be located in the northeastern portion of the Preserve. The proposed trail segment on existing disturbed area would generally travel east and west, connecting State Route 67 and Calle de Rob – Eastern Segment; County TCT (#11). The majority of the trail is composed of Diegan coastal sage scrub and non-native grassland, with improvements proposed.

30 – Connection to Calle de Rob and South Raptor Loop South - Proposed Trail

The Connection to Calle de Rob and South Raptor Loop South proposed trail segment would be located in the northern portion of the Preserve. The trail would generally travel north and south, connecting to the Waterfall Trail (#7) to the south and South Raptor Loop South Trail (#5) to the north. The majority of the proposed trail is composed of Diegan coastal sage scrub and southern mixed chaparral habitat.

31 – County TCT – Proposed Trail

The County TCT proposed trail segment would be located in the northwestern portion of the Preserve and entirely within the northeast corner of the 2015 Southern Addition. The trail segment would travel east and

west, connecting to the Calle de Rob (#10) trail segment and Sycamore Park Drive (#0b) access road. The majority of the trail segment alignment is composed of coastal sage – chaparral transitional habitat.

32 – Overlook – Proposed Trail

The Overlook proposed trail segment would be located in the northern portion of the Preserve. The trail would generally travel north and south, connecting to the Calle de Rob (#10) existing informal trail segment to the north. The majority of the proposed trail segment alignment is composed of southern mixed chaparral.

33 – Rock and Roll Trailhead Parking

The Rock and Roll Trailhead Parking is located in the center of the Preserve near the intersection of the Sycamore Park Drive (#0b) access road and the Rock and Roll Trail (#22) proposed trail segment. The Rock and Roll Staging Area is located entirely within existing disturbed habitat and Diegan coastal sage scrub habitat.

34 – Stowe Trail Connector – Existing Formal Trail

The Stowe Trail Connector is an existing formal trail segment located in the western portion of the Preserve. The trail segment generally travels north and south, connecting to the Sycamore Canyon (#0a) access road to the Preserve boundary. The existing formal trail is primarily composed of southern mixed chaparral habitat.

Impact Types

Implementation of the proposed project would primarily have two classes of impacts: 1) permanent direct impacts on vegetation communities and the sensitive plants living in them, and the resulting loss of habitat for sensitive animals, and 2) indirect effects on certain sensitive animal species from increased public presence.

However, construction of the trail system would rely on hand tools and small mechanized equipment designed for trail building and would not have significant direct or indirect effects beyond the loss of habitat. The trail construction would be conducted in compliance with state and federal criminal prohibitions against taking of nesting birds and would not be expected to result in any direct or indirect mortality of general or sensitive wildlife species.

Habitat Impacts

Complete development of the proposed project including the proposed trails, proposed trails on existing disturbed areas, and potential future trail connections would result in direct permanent and temporary impacts on a maximum of 5.3 acres of sensitive natural communities, including 0.1 acre of open coast live oak woodland, 2.1 acres of Diegan coastal sage scrub: coastal form, 0.9 acre of coastal sage-chaparral transition, 0.9 acre of southern mixed chaparral, 0.6 acre of chamise chaparral, and 0.7 acre of non-native grassland. The proposed trails, future trail connections, and proposed trails on existing disturbed areas have been sited and designed to avoid oak trees, and no impacts to oak trees would occur.

Table 1, *Project Impacts on Habitat/Vegetation Communities* below summarizes the impacts on habitat types/vegetation communities from development of the proposed project.

Table 1
PROJECT IMPACTS ON HABITAT/VEGETATION COMMUNITIES¹

Vegetation Community²	Impacts (Acres)³	Mitigation Ratio⁴	Mitigation (Acres)⁴
Sensitive Vegetation Communities			
Tier I			
Scrub Oak Chaparral (37900)	--	2:1	--
Southern Riparian Forest (61300)	--	2:1	--
Southern Coast Live Oak Riparian Forest (61310)	--	2:1	--
Southern Riparian Woodland (62500)	--	2:1	--
Unvegetated Channel (64200)	--	2:1	--
Dense Coast Live Oak Woodland (71160)	--	2:1	--
Open Coast Live Oak Woodland (71161)	0.1 ⁵	2:1	0.2
Tier II			
Diegan Coastal Sage Scrub (32500)	2.1	1.5:1	3.2
Coastal Sage-Chaparral Transition (37G00)	0.9	1.5:1	1.4
Tier III			
Southern Mixed Chaparral (37120)	0.9	1:1	0.9
Chamise Chaparral (37200)	0.6	1:1	0.6
Non-native Grassland (42200)	0.7	0.5:1	0.4
<i>Subtotal Sensitive Communities</i>	5.3		6.7
Non-Sensitive Vegetation Communities			
Tier IV			
Disturbed Habitat (11300)	1.5	N/A	N/A
N/A			
Developed Land (12000)	--	N/A	N/A
<i>Subtotal Non-Sensitive Communities</i>	1.5		
TOTAL	6.8		6.7

¹ Upland habitats are rounded to the nearest 0.1 acre; thus, total reflects rounding.

² Vegetation categories and numerical codes are from Holland (1986) and Oberbauer (2008). County Subarea Habitats and Tiers are from the MSCP.

³ Impacts are calculated from Proposed Trails, Existing Trails on Previously Disturbed Areas, and Potential Future Trail Connections.

⁴ Mitigation is calculated assuming mitigation occurs within a BRCA. The revegetation of 5.6 acres of existing trails to be closed as part of the proposed project will fulfill part of the project's mitigation requirements.

⁵ Although there could be impacts to Open Coast Live Oak Woodland, there would be no impacts to individual oak trees.

Sensitive Plant Impacts

Five special status plant species were observed within the survey area for the PAP during the 2019-2022 biological surveys. Additionally, eleven other special status plant species have been documented within the Study Area during previous surveys for the Preserve. Surveys and documentation indicated that 16 special status plant species occur within the survey area. This includes six County List A species (San Diego thorn-

mint [*Acanthomintha ilicifolia*], willow monardella [*Monardella viminea*], variegated dudleya [*Dudleya variegata*], Deane's milkvetch [*Astragalus deanei*], delicate clarkia [*Clarkia delicata*], and San Diego goldenstar [*Bloomeria clevelandii*] and ten County List D species (graceful tarplant [*Holocarpha virgata* ssp. *elongata*], small-flowered morning glory [*Convolvulus simulans*], rush chaparral-star [*Xanthisma junceum*], San Diego County viguiera [*Bahiopsis laciniata*], ashy spike moss [*Selaginella cinerascens*], California adder's-tongue [*Ophioglossum californicum*], Palmer's grappling hook [*Harpagonella palmeri*], golden-rayed pentachaeta [*Pentachaeta aurea* ssp. *aurea*], Engelmann oak [*Quercus engelmannii*], and Palmer's sagebrush [*Artemisia palmeri*]).

Impacts from the analyzed trail segments to the following species would be mitigated to less than significant levels, as detailed in the Biological Resources Technical Report (BRTR) for the proposed project: San Diego thorn-mint (Federally Endangered, State Endangered, County List A, and California Rare Plant Rank [CRPR] 1B.1). Impacts to rush chaparral-star, San Diego County Viguiera, and ashy spike-moss would be reduced to a level less than significant because the Preserve includes extensive habitat occupied by these relatively common species, and these species are conserved through the MSCP program. Additionally, impacts would be less than significant given that any development of trails in previously undeveloped areas would occur as thin strips and the proposed project footprint comprises a small fraction of the available habitat for these species throughout the Preserve. No impacts are anticipated to other special status plant species. Proposed project impacts have been sited and designed to avoid oak trees, and no impacts to oak trees would occur.

Sensitive Wildlife Impacts

The proposed project would potentially result in impacts to 44 special status animal species. These include 16 County Group 1 species, 25 County Group 2 species, and two species not on the County lists, but are State species of special concern species. Implementation of the proposed project would affect special status animal species through the reduction in suitable habitat used by the species; however, due to the amount of habitat available within the Preserve, most impacts would be less than significant. Four special status animal species were observed or detected within the survey area during the 2019 general biological survey and 2022 Hermes copper butterfly survey: Quino checkerspot butterfly (QCB; *Euphydryas editha quino*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), coastal California gnatcatcher (*Polioptila californica californica*), and southern mule deer (*Odocoileus hemionus*). The 40 other special status animal species have been documented within the Preserve during previous surveys for the Preserve prior to 2019, including: western spadefoot toad (*Spea hammondi*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), red diamond rattlesnake (*Crotalus ruber*), Coronado skink (*Plestiodon skiltonianus interparietalis*), northern three-lined boa (*Lichanura orcuttii*), Blainville's horned lizard (*Phrynosoma blainvillii*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), two-striped garter snake (*Thamnophis hammondi*), Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Bell's sage sparrow (*Amphispiza bellii bellii*), golden eagle (*Aquila chrysaetos*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), California horned lark (*Eremophila alpestris actia*), bald eagle (*Haliaeetus leucocephalus*), yellow-breasted chat (*Icteria virens*), osprey (*Pandion haliaetus*), yellow warbler (*Setophaga petechia*), western bluebird (*Sialia mexicana*), barn owl (*Tyto alba*), burrowing owl (*Athene cunicularia*), Vaux's swift (*Chaetura vauxi*), pallid bat (*Antrozous pallidus*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), western red bat (*Lasiurus blossevillii*), western yellow bat (*Lasiurus xanthinus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), western small-footed myotis (*Myotis ciliolabrum*),

Yuma myotis (*Myotis yumanensis*), San Diego desert woodrat (*Neotoma lepida intermedia*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), big free-tailed bat (*Nyctinomops macrotis*), and mountain lion (*Puma concolor*). Also, Crotch's bumble bee (*Bombus crotchii*), a candidate species under the California Endangered Species Act (CESA), was identified on nearby private property in 2023 and has a moderate potential to occur within the Study Area.

Impacts from the analyzed trail segments to the following species would be mitigated to less than significant levels, as detailed in the Biological Resources Technical Report (BRTR) for the proposed project: QCB, Hermes copper butterfly (*Lycaena hermes*), western spadefoot toad, coastal California gnatcatcher, bald eagle, burrowing owl, coastal California gnatcatcher, northern harrier, Vaux's swift, yellow-breasted chat, yellow warbler, barn owl, Bell's sage sparrow, California horned lark, Cooper's hawk, golden eagle, osprey, red-shouldered hawk, sharp-shinned hawk, southern California rufous-crowned sparrow, turkey vulture, western bluebird, and white-tailed kite. Impacts to the other special status animal species listed above would be less than significant. As the Crotch's bumble bee is currently a candidate species under CESA, DPR will continue to coordinate with CDFW as a final decision is made regarding listing of the species to ensure its adequate protection.

Jurisdictional Wetlands and Waterways

The proposed project will not result in impacts to jurisdictional wetlands or waterways. The survey area supports fifteen features that were identified and mapped for potential state and federal jurisdiction. A total of 0.51 acre of waters of the U.S. may be subject to U.S. Army Corps of Engineers and Regional Water Quality Control Board regulatory jurisdiction pursuant to Sections 404 and 401 of the CWA. Additionally, 0.60 acre of streambed and riparian resources occur within the jurisdictional delineation review area and would be subject to CDFW jurisdiction pursuant to Sections 1600–1616 of the California Fish and Game Code (CFG Code).

The proposed project would not impact riparian habitats or jurisdictional features because the at-grade crossings proposed as part of the proposed project would not grade, develop, or alter the substrate of the features, nor would the proposed project utilize mechanized earth moving equipment as part of construction. In addition, loose soil material kicked up from walking, riding, or biking across the features would not constitute a regulated discharge of fill material to jurisdictional non-wetland waters. The proposed project would not modify existing culverts, channels, or streams. Thus, no impacts on the identified features or on CDFW jurisdictional habitat would occur. In addition, the proposed project does not propose any new uses for groundwater that would otherwise impact the functions and values of existing wetlands on the Preserve. Therefore, the proposed project would result in less than significant impacts, and would not result in cumulatively considerable impacts, on potentially jurisdictional waterways. No State or Federally protected wetlands would be impacted, and therefore no direct, indirect, or cumulative impacts would occur on State or Federally protected wetlands. No impacts would occur on jurisdictional features.

Core Wildlife/Wildlife Corridors

The Preserve currently consists of 2,847 acres of open space, including approximately 19.5 acres of existing trails, maintenance, and access roads. At a maximum, approximately 2.9 acres of impact would result from establishing new proposed trails, 0.6 acre of impact from potential future trail connections, and approximately 3.3 acres of impact would result from the PAP component of the proposed project for improvements to existing trails in previously disturbed areas. The proposed project would therefore impact

6.8 acres, including impacts to disturbed habitat and developed land. Additionally, a total of 5.6 acres of trails will be closed and revegetated through implementation of the PAP. All impacts to habitat within the Preserve would occur as thin strips to either establish trail segments in previously undeveloped areas or in previously disturbed areas.

The proposed trail segments would not substantially interfere with the ability of wildlife species to disperse to adjacent conserved land areas, as adequate connectivity is maintained. The proposed project would not propose fixed nighttime lighting that would promote nighttime usage. The proposed project would conform to the goals and requirements of the Subarea Plan and BMO, including effects on habitat linkages and wildlife corridors. The proposed project would maintain connectivity within the core wildlife habitat, to adjacent linkages, and to adjacent, undeveloped habitat. With the proposed project's location within and adjacent to undeveloped areas, incorporation of design features, and implementation of the previously identified habitat mitigation measures, the proposed project's impacts would be less than significant.

Biological open space extends uninterrupted across the Preserve and includes large expanses of native scrub habitats, as well as riparian areas. Due to the lack of permanent water, wildlife likely forage, seek shelter, and move through the Preserve following routes to areas with fresh water, such as San Vicente Reservoir to the east. These habitats within the Preserve will continue to provide foraging and breeding habitat for a variety of species, including coastal California gnatcatcher. Proposed project construction would not impede access or lessen the area available for terrestrial wildlife movement. Coyotes are frequently observed throughout the Preserve and do not avoid the existing trails. Southern mule deer and mountain lion are the largest mammal species that could potentially occur on-site, and suitable expanses of habitat will be maintained for deer and mountain lion to move through the area. Movement of other medium-sized mammals, such as bobcat, is more likely to follow riparian areas associated with Sycamore Canyon Creek and other areas with sufficient vegetative cover. Small animals could also cross the proposed trail segments. No new impacts are proposed for the existing trail segment along Sycamore Canyon Creek, including the West Boundary (#13) trail segment, and vegetation impacts associated with the construction of new trail segments will be minimized. The proposed project would maintain a continuous connection of undeveloped land and native habitat, including connections to Sycamore Canyon Creek, Clark Canyon, and to adjacent open space areas. Therefore, the proposed project would not impede wildlife access to habitat necessary for reproduction. Impacts would be less than significant.

The proposed project is in a relatively undeveloped part of San Diego County. The area consists of continuous blocks of habitat. Wildlife movement in the area has already been impacted by the construction of nearby roadways, including Scripps Poway Parkway and SR-67, residential and commercial development, nearby mineral extraction activities, military activities, agriculture, and the presence of existing trails, maintenance, and access roads.

Trails would be expected to be used by medium and large mammals for ease of movement through the Preserve. No features would be constructed that would impinge any movement areas, including ridgelines or canyons. Wildlife movement is not expected to be substantially constrained by the construction of new trail segments as (1) trail construction would not substantially change topography; (2) the proposed project maintains connectivity to core wildlife habitat along the Sycamore Canyon Creek and Clark Canyon to the surrounding undeveloped areas; (3) the proposed project would not impact existing Waters of the U.S./State at trail crossings; (4) trails would not be so wide or heavily-trafficked as to prevent animals from moving across them; and (5) existing lines-of-sight would be maintained across trails. The Study Area provides adequate space and resources for wildlife known to use the site, maintains connectivity to off-site

resources, and functions to facilitate bird and mammal movement through the area, including for species targeted for conservation in the region, such as the coastal California gnatcatcher. Therefore, the proposed project would not significantly impact the viability of a core wildlife area and biological connectivity between the Preserve and adjacent open space areas would be maintained.

Mitigation Measures

In order to reduce potentially significant impacts to a less than significant level, the County proposes the following Mitigation Measures as part of the proposed project:

MM-BIO-1 Focused surveys for San Diego thorn-mint will be completed within areas of critical habitat during the blooming period for this species (April – May) prior to clearing and grubbing of the proposed Rock and Roll Trail (#22) segment improvements or reroutes. San Diego thorn-mint observed in the proposed impact area will be flagged and avoided during trail construction. A buffer shall be established with fencing and signage to protect the observed population. The buffer shall be 25 feet where feasible.

If impacts to San Diego thorn-mint individuals cannot be avoided, they shall be quantified and limited to no more than 20 percent of the total population in the area, consistent with the BMO Section 86.507.a.1, as determined during pre-construction surveys and documented in a letter report submitted by the County-approved biologist to DPR. The mapping of plant populations will extend beyond the impact area into the adjacent area that meets the species' habitat requirements, as determined by the County-approved biologist. DPR will review and approve the letter report and implement the mitigation according to the Mitigation Monitoring and Reporting Program for the project. Impacts shall be mitigated consistent with the BMO Section 86.507.a.1 at a 2:1 ratio if less than 10 percent of the total population is impacted, or 3:1 ratio if less than 20 percent of the total population is impacted. The proposed project will avoid impacting more than 20 percent of the total population.

Mitigation will consist of on- or off-site preservation, translocation, and/or restoration within a BRCA, with a preference for species salvage and translocation on-site if feasible. Seed material will be sourced from within five miles of the Preserve, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. Additionally, any trail or trail segment closure within areas of critical habitat for San Diego thorn-mint will include revegetation with species known as common associates to San Diego thorn-mint populations. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure **BIO-2**.

MM-BIO-2 Prior to vegetation clearing for the proposed Rock and Roll Trail (#22) segment improvements or reroutes, if San Diego thorn-mint is being impacted and translocation is selected as part of the mitigation package according to the letter report prepared under mitigation measure **BIO-1**, a plant salvage and translocation plan shall be prepared for San Diego thorn-mint impacted by the project. The plan shall, at a minimum, evaluate options for plant salvage and relocation, including native plant mulching, selective soil salvaging, and application/relocation of resources within the Study Area. Relocation efforts may include seed collection and/or translocation to a suitable receptor site and will be based

on the most reliable methods of successful relocation. The program shall contain a recommendation for method of salvage and relocation/application based on feasibility of implementation and likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, success criteria, estimated completion time, and any relevant contingency measures. The resource salvage plan shall be prepared by a County-approved biologist and shall be implemented according to the Mitigation Monitoring and Reporting Program for the project.

MM-BIO-3

Grading or clearing of Diegan coastal sage scrub during the breeding season of the coastal California gnatcatcher (March 1 to August 15) shall be avoided to the extent feasible. If grubbing, clearing, ~~or grading,~~ and/or revegetation activities would occur during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within 500 feet of the survey area, clearing, grubbing, ~~and grading,~~ and/or revegetation shall be allowed to proceed in that area. If active nests or nesting birds are observed within 500 feet of the survey area, the biologist shall flag a buffer around the active nests, and clearing, grubbing, ~~or grading,~~ and/or revegetation activities shall not occur within 500 feet of active nests until nesting behavior has ceased, nests have failed, or young have fledged as determined by a qualified biologist. If the qualified biologist determines that the species will not be impacted with a reduced buffer, potentially with the implementation of avoidance measures to reduce noise, as necessary, and/or the qualified biologist monitors the active nest during clearing, grubbing, ~~or grading,~~ and/or revegetation to ensure no impacts to the species occur, these activities may occur outside the reduced buffer during the breeding season, as long as the species is not impacted.

MM-BIO-4

Grubbing or clearing of vegetation during the general avian breeding season (February 15 – September 15) or raptor breeding season (January 15 – July 15) shall be avoided to the extent feasible. If grubbing, clearing, ~~or grading,~~ and/or revegetation would occur during the general avian breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of grubbing, ~~or clearing,~~ and/or revegetation activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, clearing, grubbing, ~~and grading,~~ and/or revegetation shall be allowed to proceed. Furthermore, if ~~construction~~ activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted. If active nests or nesting birds are observed within the area, the biologist shall flag the active nests and ~~construction activities~~ clearing, grubbing, grading, and/or revegetation shall avoid active nests until nesting behavior has ceased, nests have failed, or young have fledged. An initial buffer distance of 500 feet for raptor nests and 300 feet for nests of general avian species shall be provided. If the qualified biologist determines that the species will not be impacted with a reduced buffer, potentially with the implementation of avoidance measures to reduce noise, as necessary, and/or the qualified biologist monitors the active nest during clearing, grubbing, ~~or grading,~~ and/or revegetation to ensure no impacts to the species

occur, these activities may occur outside the reduced buffer during the breeding season, as long as the species is not impacted.

MM-BIO-5

Because the Preserve is a Biological Resource Core Area (BRCA), mitigation for impacts to 3.0 acres of Diegan coastal sage scrub and coastal sage-chaparral transition, both Tier II habitats, shall occur at a 1.5:1 ratio through preservation, revegetation/restoration, or purchase of Tier II mitigation credits from an approved mitigation bank within the South County MSCP Subarea Plan per Attachment M of the BMO. The mitigation site will meet the criteria for a BRCA in order to use a 1.5:1 ratio, as the impacted land meets the criteria for BRCA. Otherwise, the mitigation ratio will be 2:1 if the mitigation site does not meet the criteria for BRCA. Some or all of the mitigation for impacts to 3.0 acres of Tier II habitat could occur as part of the revegetation of existing trail segments to be closed. Revegetation will be accomplished by a combination of barricade and sign installation, soil decompaction (where needed), and native seed application (see also BIO-6). Seed material will be sourced from within five miles of the Preserve, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. Revegetation efforts will be monitored by a qualified biologist and maintained for a period of three years following implementation. Maintenance will be conducted by a qualified contractor with experience in native habitat restoration and will include control of non-native plant species and remedial measures, such as re-seeding and installation of additional barricades and signage, to help ensure the success of the revegetation efforts. Closed trail segments to be revegetated within occupied QCB habitat will be revegetated with passive methods that would avoid impacts to QCB and their larval host plants.

MM-BIO-6

Trail segments to be closed and revegetated will incorporate native species in seed mixes that will enhance sensitive species documented within the Preserve, including San Diego thorn-mint and habitat that supports QCB. Revegetation will be accomplished by a combination of barricades (fences, rocks, etc.), sign installation, or through other natural means, as well as soil decompaction (where needed) and native seed application. Revegetation of trail segments within areas of critical habitat for San Diego thorn-mint will include seeding with native geophytes (i.e., wild onion [*Allium* spp.] and goldenstar [*Bloomeria crocea*]) known to occur with San Diego thorn-mint on gabbro soils. Revegetation of trail segments within areas of suitable habitat for QCB will include host plant species (i.e., dot-seed plantain) and nectar resources. A qualified biologist shall flag sensitive resources, including habitat suitable for Hermes copper butterfly and Quino checkerspot butterfly, for avoidance prior to implementation/installation of revegetation.

Table 4a
Mitigation Ratios – Tier I

Tier I	Impacted Land	
Mitigation Site	Within BRCA	Outside BRCA
Within BRCA	<u>2:1</u>	<u>1:1</u>
Outside BRCA	<u>3:1</u>	<u>2:1</u>

Table 4b
Mitigation Ratios – Tier II

<u>Tier II</u>	<u>Impacted Land</u>	
<u>Mitigation Site</u>	<u>Within BRCA</u>	<u>Outside BRCA</u>
<u>Within BRCA</u>	<u>1.5:1</u>	<u>1:1</u>
<u>Outside BRCA</u>	<u>2:1</u>	<u>1.5:1</u>

Table 4c
Mitigation Ratios – Tier III

<u>Tier III</u>	<u>Impacted Land</u>	
<u>Mitigation Site</u>	<u>Within BRCA</u>	<u>Outside BRCA</u>
<u>Within BRCA</u>	<u>1:1</u>	<u>0.5:1</u>
<u>Outside BRCA</u>	<u>1.5:1</u>	<u>1:1</u>

MM-BIO-7 Mitigation for permanent impacts to Potential Hermes Copper Butterfly Habitat ~~within~~ shall occur at a 1:1 ratio within the South County MSCP Subarea, within a BRCA, or at the ratios identified in the BMO. Permanent impacts to Potential Hermes Copper Butterfly Habitat are expected to be 0.05 acre. Mitigation shall occur through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-8 The following Hermes Copper Butterfly conservation measures apply along the Hermes Copper Butterfly Avoidance Area on Figure 8b of the proposed project’s BRTR. Additional Hermes Copper Butterfly surveys will be conducted prior to construction, in order to ensure that potential habitat is delineated to the greatest extent feasible. This mitigation would be expanded to any additional area where Hermes Copper Butterfly is identified during preconstruction surveys.

Step 1: Survey

- Prior to initiating work within the Hermes Copper Butterfly Avoidance Area, a qualified biologist shall complete protocol flight season surveys for the Hermes Copper Butterfly in accordance with the survey guidelines outlined in Attachment B of the County’s Report Format and Content Requirements for Biological Resources (County 2010a).
- During host plant mapping, host plant patches will be mapped using GPS, so they can be flagged prior to construction.

Step 2: Avoidance and Minimization Measures

- Following flight season surveys and host plant mapping, realign or leave potential impact areas unimproved, as needed, to avoid direct impacts to host plants (Spiny redberry plants that are within 15 feet of buckwheat) as much as possible.
- All construction within mapped Hermes Copper Butterfly habitat, including buckwheat within 15 feet of Spiny redberry, will be prohibited during the flight season (defined as the third full week of May through the first full week of July).

- A qualified biologist will monitor construction within the Hermes Copper Butterfly Avoidance Area to ensure that all flagged and mapped host plant locations planned for avoidance are avoided.
- The qualified biologist will conduct environmental awareness training for all personnel entering the site during the construction of the proposed project.
- Following trail installation, maintenance activities in areas supporting Hermes Copper Butterfly host plants within the Hermes Copper Butterfly Avoidance Area shall either occur outside of the Hermes Copper Butterfly flight season or be monitored, as appropriate, by a qualified biologist.
- Install signs and/or fencing along the avoided host plants stating, “Environmentally sensitive area. Please stay on trail,” or similar language.

Step 3: Compensatory Mitigation

If the flight season surveys conducted in Step 1 are positive and the proposed project cannot be redesigned to avoid impacts to all Hermes Copper Butterfly host plant patches, then in addition to the surveys and avoidance and minimization measures in Steps 1 and 2 above, the impacts to Occupied Hermes Copper Butterfly host plant patches will be mitigated at a 3:1 ratio through one or a combination of the following: on- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.

MM-BIO-9

The following QCB conservation measures apply along the Rock and Roll Trail (#22) segment, shown as QCB Avoidance Area on Figure 8b of the proposed project’s BRTR. Additional QCB host plant mapping will be conducted prior to construction when host plants are blooming, in order to ensure host plant patches are delineated to the greatest extent feasible. This mitigation would be expanded to any additional area where QCB host plants are identified during preconstruction plant mapping.

Step 1: Survey

- Additional QCB host plant mapping will be conducted prior to construction when host plants are blooming, in order to ensure host plant patches are delineated to the greatest extent feasible.
- During host plant mapping, host plant patches will be mapped using GPS, so they can be flagged prior to construction.

Step 2: Avoidance and Minimization Measures

- Following host plant mapping, realign or leave potential impact areas unimproved, as needed, to avoid direct impacts to host plants as much as possible.

- All construction within mapped QCB host plant patches will be prohibited during the QCB flight season (defined as the third week of February through the second Saturday in May).
- A qualified biologist will monitor construction within the QCB Avoidance Area to ensure that all flagged and mapped host plant locations planned for avoidance are avoided.
- The qualified biologist will conduct environmental awareness training for all personnel entering the site during the construction of the proposed project.
- Following construction, maintenance activities in areas supporting QCB host plants within the QCB Avoidance Area shall either occur outside of the QCB flight season or be monitored, as appropriate, by a qualified biologist.
- Install signs and/or fencing along the avoided host plants stating, “Environmentally sensitive area. Please stay on trail,” or similar language.

Step 3: Compensatory Mitigation

If the proposed project cannot be redesigned to avoid impacts to all QCB host plant patches, then in addition to the surveys and avoidance and minimization measures in Steps 1 and 2 above, consultation with USFWS will be required. Mitigation may consist of one or a combination of on- or off-site planting of host plants, providing long-term maintenance of existing host plants, preserving occupied QCB habitat, or similar measures to the satisfaction of the USFWS.

MM-BIO-10 Focused surveys for western spadefoot toad will be completed by a qualified biologist prior to clearing and grubbing of the proposed trail segment improvements or reroutes. Occupied western spadefoot toad habitat observed in the proposed impact area will be flagged and avoided during trail construction until the qualified biologist determines that western spadefoot toad are no longer using the habitat.

MM-BIO-11 To help ensure errant impacts to sensitive vegetation communities and jurisdictional waters outside of the impact footprint are avoided during construction, environmental exclusionary fencing, where determined necessary by the qualified biologist, would be installed at the edges of the impact limits prior to initiation of grading. All construction staging shall occur within the approved limits of construction. A qualified biologist will monitor the installation of environmental fencing wherever it would abut sensitive vegetation communities. The biologist also will conduct a pre-construction environmental awareness training for construction personnel prior to all phases of construction to inform personnel of the sensitive biological resources on-site and avoidance measures to remain in compliance with project approvals. The biologist will periodically monitor the limits of construction operations to ensure that avoidance areas are delineated with temporary fencing and that fencing remains intact.

MM-BIO-12 Because the Preserve is a BRCA, mitigation for impacts to 0.1 acre of open coast live oak woodland, a Tier I habitat, shall occur at a 2:1 ratio through on-site preservation of open or dense coast live oak woodland, on- or off-site revegetation of open or dense coast live oak

woodland, or purchase of Tier I mitigation credits from an approved mitigation bank within the South County MSCP Subarea Plan per Attachment M of the BMO. The mitigation site will meet the criteria for a BRCA in order to use a 2:1 ratio, as the impacted land meets the criteria for BRCA. Otherwise, the mitigation ratio will be 3:1 if the mitigation site does not meet the criteria for BRCA. Some or all of the mitigation for impacts to 0.1 acre of open coast like oak woodland could occur as part of the revegetation of 5.6 acres of existing trail segments to be closed. Revegetation will be accomplished by a combination of barricade and sign installation, soil decompaction (where needed), and native seed application (see also BIO-6). Seed material will be sourced from within five miles of the Preserve, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. Revegetation efforts will be monitored by a qualified biologist and maintained for a period of three years following implementation. Maintenance will be conducted by a qualified contractor with experience in native habitat restoration and will include control of non-native plant species and remedial measures, such as re-seeding and installation of additional barricades and signage, to help ensure the success of the revegetation efforts. Closed trail segments to be revegetated within occupied QCB habitat will be revegetated with passive methods that would avoid impacts to QCB and their larval host plants.

MM-BIO-13

Because the Preserve is a BRCA, mitigation for impacts to 2.2 acres of southern mixed chaparral, chamise chaparral, and non-native grassland, Tier III habitats, shall occur at a 1:1 ratio through on-site preservation, revegetation/restoration, or purchase of Tier III mitigation credits from an approved mitigation bank within the South County MSCP Subarea Plan per Attachment M of the BMO. The mitigation site will meet the criteria for a BRCA in order to use a 1:1 ratio, as the impacted land meets the criteria for BRCA. Otherwise, the mitigation ratio will be 1.5:1 if the mitigation site does not meet the criteria for BRCA. Some or all of the mitigation for impacts to 2.2 acres of Tier III habitat could occur as part of the revegetation of 5.6 acres of existing trail segments to be closed. Revegetation will be accomplished by a combination barricade and sign installation, soil decompaction (where needed), and native seed application (see also MM-BIO-6). Seed material will be sourced from within five miles of the Preserve, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. Revegetation efforts will be monitored by a qualified biologist and maintained for a period of three years following implementation. Maintenance will be conducted by a qualified contractor with experience in native habitat restoration and will include control of non-native plant species and remedial measures, such as re-seeding and installation of additional barricades and signage, to help ensure the success of the revegetation efforts. Closed trail segments to be revegetated within occupied QCB habitat will be revegetated with passive methods that would avoid impacts to QCB and their larval host plants.

The findings contained within this document are based on County records and the BRTR for the proposed project. 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 proposed project has been found to conform to the South County MSCP Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County, CDFW, and the U.S. 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 proposed project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the proposed 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 project area qualifies as a BRCA because it is wholly located within PAMA and is located within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species.

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

According to Section 86.506 of the San Diego BMO (2010), if land is shown as PAMA on a pre-approved mitigation map approved by the Wildlife Agencies, such as in the Subarea Plan, it is considered to be a BRCA. The Preserve is designated as PAMA on the Wildlife Agencies' preapproved mitigation map for the Subarea Plan. Mitigation for proposed project impacts will occur primarily or wholly within the Preserve, and any off-site mitigation would be located within a BRCA.

III. Biological Mitigation Ordinance Findings

The proposed project is exempt from the BMO (Section 86.503(a)(8)), which states:

A public facility or public project, determined to be essential by the County, including but not limited to a County Park or County recreational facility, provided that the County decision making body considering such a project makes the following findings:

a. The facility or project is consistent with the County General Plan, the MSCP Plan and Subarea Plan, as approved by the Board of Supervisors;

General Plan conformance: The proposed project is consistent with the County of San Diego General Plan as shown in the following findings:

The proposed project is located within the South County MSCP Subarea Plan. The proposed project supports the goals and policies outlined by the Community Trails Master Plan (County 2005) which includes objectives, policies, goals, implementation strategies, and guidelines for the management and expansion of the recreational trail network throughout the County. This proposed project is

within the County's Lakeside Community Planning Area. The non-motorized recreational trail would provide increased opportunities for walking, bicycling, and equestrian use. The proposed project is intended to increase and improve connectivity and mobility of non-motorized users within the community and throughout the region.

The proposed trail segments have been designed to follow the County's Preserve Trail Guidelines (County 2018) and to support the goals and policies outlined by the Community Trails Master Plan (County 2005) and comply with the MSCP Framework Management Plan (County 2001). The trails would generally follow trail types defined in the Preserve Trail Guidelines.

This proposed project is consistent with the Subarea Plan as detailed in this MSCP Conformance Statement. The project proposes passive recreation (trails), which are an allowable use in the Preserve per the MSCP. The proposed project will help create public access while ensuring all potential impacts are mitigated to a less than significant level.

- b. All feasible mitigation measures have been incorporated into the facility or project, and there are no feasible, less environmentally damaging locations, alignments or non-structural alternatives that would meet project objectives;**

The PAP would provide approximately 3.78 miles of new proposed trails or trail segments, 0.99-mile of potential future trail connections, 4.76 miles of formalization of trails or trail segments on existing disturbed areas, and 5.56 miles of existing formal trails. The formal trail network would therefore increase to 15.09 miles and provide trails dedicated to multi-use routes for hikers, mountain bikers, e-bikers, and horseback riders. The PAP would also maintain 6.61 miles of existing access roads and would plan to close 7.24 miles of existing trails, including informal trails. The width of proposed trails has been minimized, with trails ranging from 4 to 8 feet in width. Trail surface will be native soil, decomposed granite, crushed granite, or existing road. The trail alignment and design were created to avoid or minimize impacts to the surrounding habitat, sensitive species, and natural resources. Trail alignments were adjusted during the environmental analysis to reduce habitat impacts and avoid wetlands and streams, and the least impactful combination of trail alignments was selected as the proposed project. Habitat-based mitigation for permanent and temporary direct impacts will be implemented through on-site or off-site habitat preservation, enhancement, restoration, and/or purchase of mitigation credits, all within BRCA. Mitigation would follow the mitigation ratios in Attachment M of the BMO, as illustrated in Table 1 above. Mitigation for habitat impacts is described in mitigation measures **BIO-5**, **BIO-12**, and **BIO-13**. Mitigation for impacts on sensitive species and nesting bird protected under the Migratory Bird Treaty Act and CFG Code is described in mitigation measures **BIO-3** and **BIO-4**. These mitigation measures ensure that any significant impacts on sensitive habitat and sensitive species would be reduced to a less than significant level.

- c. Where the facility or project encroaches into a wetland or floodplain, mitigation measures are required that result in a net gain in wetland and/or riparian habitat;**

The proposed project does not encroach into a wetland or floodplain or result in any impacts to jurisdictional features. The proposed project has been designed to reduce impacts on sensitive vegetation within BRCA, and although the trail will be located adjacent to wetland/riparian habitat, it has been designed to avoid impacts on wetland waters or jurisdictional features.

d. Where the facility or project encroaches into steep slopes, native vegetation will be used to revegetate and landscape cut and fill areas;

The proposed project would require limited grading for the new trails. However, the project would use trail placement, reduced trail width, and/or retaining walls to avoid creating large cut or fill slopes. Revegetation included in the proposed project will use native landscaping.

e. No mature riparian woodland is destroyed or reduced in size due to otherwise allowed encroachments; and

The proposed project would have no impact on mature riparian woodland. Direct impacts to riparian areas and oak trees within the survey area will be avoided.

f. All Critical Populations of Sensitive Plant Species Within the MSCP Subarea, (Attachment C); Rare, Narrow Endemic Animal Species Within the MSCP Subarea, (Attachment D); Narrow Endemic Plant Species Within the MSCP Subarea, (Attachment E); and San Diego County Sensitive Plant Species, as defined herein will be avoided as required by, and consistent with, the terms of the Subarea Plan.

Variegated dudleya, San Diego thorn-mint, and QCB are the only narrow endemic species previously observed within the Preserve and with high potential to occur in the survey area.

While variegata dudleya was observed outside the survey area during the 2019 survey, no variegated dudleya was observed within the survey area or the existing and proposed Rock and Roll Trail (#22) segment alignments. Additionally, the variegated dudleya populations are more than 50 feet from any of the existing or proposed trail segment locations. Therefore, no impacts to this species are expected.

Impacts to San Diego thorn-mint critical habitat would result from improvements to the southwestern portion of the existing Rock and Roll Trail (#22) segment or by the proposed re-route of this trail segment. If impacts to San Diego thorn-mint individuals cannot be avoided, impacts shall be mitigated consistent with the BMO Section 86.507.a.1 at a 2:1 ratio if less than 10 percent of the total population is impacted, or 3:1 ratio if less than 20 percent of the total population is impacted. The proposed project will avoid impacting more than 20 percent of the total population. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure **BIO-2**. The project would impact less than one percent of the critical habitat for San Diego thorn-mint within the Preserve by proposed improvements to the existing Rock and Roll Trail (#22) segment and/or by the proposed re-route of the southwestern portion of the Rock and Roll Trail (#22) segment. Impacts to the San Diego thorn-mint population within the Preserve would be reduced to less than significant with implementation of Mitigation Measures **BIO-1**, **BIO-2**, and **BIO-6**. Therefore, the project impacts to MSCP narrow endemic species would not impact core populations and the Project is consistent with the terms of the Subarea Plan.

QCB host plants were observed along the Rock and Roll Trail (#22) segments (dot-seed plantain [*Plantago erecta*], woolly plantain [*Plantago patagonica*], purple owl's clover [*Castilleja exserta*], and rigid bird's beak [*Cordylanthus rigidus*]). Project construction within on-site breeding habitat for this sensitive species would therefore result in significant impacts. These impacts would be

mitigated through the implementation of Mitigation Measure **BIO-9**. Therefore, the proposed project impacts to QCB associated with the Rock and Roll Trail (#22) segment would be less than significant following mitigation. The revegetation of adjacent trail segments to be closed (see Mitigation Measure **BIO-6**) would include habitat enhancement (inclusion of host plant species in seed mixes) for the QCB. Therefore, the proposed project impacts to QCB associated with the Slaughterhouse Canyon Trail (#21) segment and adjacent ridgelines as well as Rock and Roll Trail (#22) segments would be less than significant following mitigation. Additionally, project impacts to QCB within the Preserve would be less than significant.

IV. Subarea Plan Findings

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

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

The project has been designed to avoid impacts on wetland waters or jurisdictional features. Because the project will not result in any impacts to jurisdictional waters, the project will be consistent with the no-net-loss-of-wetlands standard, satisfying State and Federal wetland goals and policies.

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 maximizes the habitat structural diversity of conserved habitat areas by confining impacts to only 5.3 acres of sensitive habitat out of a 107.8-acre survey area. The Project will place trails along existing paved or dirt roads when possible in order to preserve a wide range of existing habitats in place, ranging from non-native grassland to scrub and chaparral habitats, to woodland and riparian forest habitats, to unvegetated channel.

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 project will impact only 2.1 acres of Diegan coastal sage scrub and 0.9 acre coastal sage-chaparral transition out of 26.6 acres existing within the survey area, thus preserving 90% of the Diegan coastal sage scrub/coastal sage-chaparral transition within the survey area. There are extensive patches of Diegan coastal sage scrub surrounding the survey area that are preserved within the trails in the 2015 Northern and Southern Additions and Martha's Grove (#12), Rock and Roll Trail (#22), Slaughterhouse Canyon Trail (#21), Ridge Trail (#14), and Canyon Trail (#16) segments. Additional undeveloped lands surrounding the survey area include connections to Sycamore Canyon Creek, Clark Canyon, and to adjacent open space areas. These areas, in combination with the preserved areas within the survey area itself, provide for conservation of spatially representative examples of extensive patches of coastal sage scrub and other high value habitat types. The majority of the survey area is mapped as very high and high habitat value on the MSCP habitat evaluation model, and the proposed project has been designed to conserve these areas as much as possible by following existing dirt roads and trails where possible, avoiding jurisdictional waters and riparian habitats, reducing trail widths, and closing and revegetating

unnecessary trails. The Project would result in direct and permanent impacts on 5.3 acres of sensitive natural or naturalized vegetation communities. Habitat-based mitigation for direct impacts on sensitive habitats will be satisfied primarily through the revegetation of 5.6 acres of existing trails to be closed within the Preserve. Additional mitigation would occur through the purchase of mitigation credits or habitat preservation, enhancement, and/or restoration within a BRCA.

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.

This proposed project is consistent with the Subarea Plan. As a trail project, the proposed project would have the potential to increase edge effects. However, the proposed project will reduce edge effects through the following design features: (1) signs precluding access to areas outside of established trails shall be posted; (2) off-leash pets would not be allowed on trails or public areas and signs would be posted along trails notifying pet owners of this regulation; (3) only non-invasive, native plant species would be included in the landscape plan for the site (species not listed on the California Invasive Plant Inventory prepared by the Cal-IPC [2006]); (4) if night lighting is utilized during construction, the project is required to direct all necessary lighting in a downward direction with appropriate shield and illumination technology to prevent adverse spillover of light; and (5) no operational project lighting is proposed. In addition, the proposed project has been designed to minimize impacts as much as possible by following existing dirt roads and trails where possible, avoiding jurisdictional waters and riparian habitats, reducing trail widths, and closing and revegetating unnecessary trails. Mitigation will occur either on-site or off-site within a BRCA, meaning that the proposed project's mitigation will contribute to preserving significant blocks of habitat on-site and/or off-site within a BRCA. Mitigation will include the closure and revegetation of 7.24 miles (5.6 acres) of existing trails, reducing edge effects from those existing trails. This will contribute to preserving the significant blocks of habitat that surround the survey area, including undeveloped habitat within the PAMA land surrounding the Preserve.

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

The proposed Project has been designed to reduce impacts on sensitive vegetation and completely avoid impacts on wetland and non-wetland waters and riparian areas. With the survey area, no impacts would occur on scrub oak chaparral, southern riparian forest, southern coast live oak riparian forest, southern riparian woodland, unvegetated channel, and dense coast live oak woodland. The Project would impact 6.8 acres in total, of which 1.5 acres are non-sensitive disturbed habitat. This was accomplished by following existing roads and trails where possible. During the design process the proposed project team also reduced trail widths, selected the least impactful trail segments as proposed project, and identified unnecessary trails for closure and revegetation. The sensitive habitats that will be impacted consist of 5.3 acres of open coast live oak woodland, Diegan coastal sage scrub: coastal form, coastal sage-chaparral transition, southern mixed chaparral, chamise chaparral, and non-native grassland, which are less sensitive than the riparian habitats that have been avoided.

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.

Limited development as part of the proposed project will not eliminate key regional populations of covered species. Impacts to San Diego thorn-mint (*Acanthomintha ilicifolia*) are considered significant and would be mitigated to less than significant levels as described in mitigation measures **BIO-1**, **BIO-2**, and **BIO-6**. The project would impact Diegan coastal sage scrub and coastal sage-chaparral transition habitat occupied by the coastal California gnatcatcher, but there is abundant coastal sage scrub habitat remaining in and around the survey area that supports or can support the coastal California gnatcatcher, and breeding season avoidance would be implemented to avoid breeding season impacts as described in mitigation measures **BIO-3** and **BIO-4**. The proposed project would impact small areas of potential Hermes copper butterfly habitat, but mitigation would be provided at a 1:1 ratio following County guidelines as described in mitigation measures **BIO-7** and **BIO-8**. Project construction within on-site breeding habitat for QCB would result in significant impacts, these impacts would be mitigated through the implementation of Mitigation Measure **BIO-9**. Construction related to implementation of the proposed project could impact western spadefoot toad, these impacts would be mitigated through Mitigation Measures **BIO-10** and **BIO-11**.

- 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 specific mitigation location(s) for the proposed project have not been identified yet; however, the Project is consistent with the Subarea Plan, which provides for the conservation of large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species. To the extent possible, the proposed project avoids impacts to sensitive species by minimizing trail width, locating trails on existing roads or trails where possible, and selecting the least impactful trail locations in order to conserve the existing large interconnecting blocks of habitat within and adjacent to the survey area. For unavoidable habitat impacts, mitigation will be provided either on-site or off-site within a BRCA according to the mitigation ratios pursuant to the County BMO and shown in Table 1 above. Mitigation for habitat impacts is described in mitigation measures **BIO-5**, **BIO-12**, and **BIO-13**. These mitigation measures ensure that any significant impacts from impacts on sensitive habitat would be reduced to a less than significant level. It was determined that implementation of the proposed project would not have a significant effect on sensitive animals occurring or potentially occurring within the survey area, including wide-ranging species such as mule deer, mountain lion, and raptors. In addition, the survey area does not contain eagle foraging habitat or nesting habitat and is not within any known golden eagle territory.

- 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.**

Variegated dudleya, San Diego thorn-mint, and QCB are narrow endemic species observed within and adjacent to the survey area.

With the proposed avoidance, minimization, and mitigation measures, the proposed project will avoid impacts to critical populations of sensitive plant species, narrow endemic animal species, narrow endemic plant species, and San Diego County sensitive plant species consistent with the terms of the Subarea Plan, including the 20 percent impact limit.

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

The proposed project is a trail project, and passive recreation (trails) are an allowable use and covered activity in the Preserve per the MSCP, meaning that the proposed project will not jeopardize preserve assembly. The survey area occurs within MSCP PAMA lands, and the proposed project is consistent with the preservation of these areas because the trail system has been designed to minimize habitat impacts, follow existing roads as closely as possible, close and revegetate unnecessary trails, and use fencing and signage to keep trail users from intruding on preserved habitat. The Central Poway/San Vicente Reservoir/North Poway BRCA overlaps the northern portion of the Preserve and Mission Trails/Kearny Mesa/East Elliot/Santee BRCA overlaps the southern portion of the Preserve. The Preserve helps facilitate connections to other large open space areas, including Mission Trails Regional Park to the southwest, MCAS Miramar to the west, Mount Woodson and Iron Mountain to the north, and San Vicente Highlands Preserve and Boulder Oaks Preserve to the east. Additionally, ridgelines on-site may provide local movement for a wide range of wildlife, including mule deer, coyote, bobcat, and mountain lion, and these movement corridors will remain in place with the proposed project. The proposed project will help create public access, direct the public to less impactful locations, and improve appreciation of nature while ensuring all potential impacts are mitigated to a less than significant level.

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

The proposed project will provide either on-site or off-site mitigation within a BRCA. The mitigation provided on-site within the Preserve will be protected from edge effects through project design features including signs, a prohibition on off-leash pets, directing construction lighting downward, not lighting the trails once constructed, and designing and constructing trails to minimize erosion and runoff.

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

The proposed project area qualifies as a BRCA because it is wholly located within PAMA. However, the proposed project has been designed to reduce impacts on sensitive vegetation within BRCA and avoid impacts on wetland waters or jurisdictional features. The trail construction would be conducted in compliance with state and federal criminal prohibitions against taking of nesting birds, and would not be expected to result in direct or indirect mortality of general or sensitive wildlife species. Additionally, this proposed project has been designed to minimize impacts on BRCA and PAMA by reducing trail widths, routing trails along existing roads and trails where possible, selecting less impactful trail locations for improvement or formalization, and closing and revegetating unnecessary trails. The proposed project would result in temporary and permanent impacts to 5.3 acres of sensitive natural or naturalized vegetation communities within a BRCA. Habitat-based mitigation for direct impacts on sensitive habitats will be satisfied primarily through the revegetation of 5.6 acres of existing trails to be closed within the Preserve. Additional mitigation would occur through the purchase of mitigation credits or habitat preservation, enhancement, and/or restoration within a BRCA. Mitigation would be provided according to the mitigation ratios in Attachment M of the BMO. Mitigation for habitat impacts from each analyzed trail segment are described in mitigation measures **BIO-5**, **BIO-12**, and **BIO-13**. These mitigation

measures ensure that any significant impacts from impacts on sensitive habitat would be reduced to a less than significant level and the proposed project is consistent with the MSCP.