



County of San Diego

**SYCAMORE CANYON/GOODAN RANCH
COUNTY PRESERVE
RESOURCE MANAGEMENT PLAN UPDATE**

STATE CLEARINGHOUSE No. 2023070450

MITIGATION MONITORING AND REPORTING PROGRAM

January 2025

Purpose

The County of San Diego would adopt this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the Sycamore Canyon/Goodan Ranch County Preserve Resource Management Plan Update Project complies with all applicable environmental mitigation requirements identified in the Final Mitigated Negative Declaration (MND) for the proposed project. The mitigation measures for the project will be adopted by the County, in conjunction with the adoption of the Final MND. The mitigation measures have been integrated into this MMRP. The MMRP provides a mechanism for monitoring the mitigation measures in compliance with the MND, and general guidelines for the use and implementation of the monitoring program are described below. Within this document, the approved mitigation measures are organized and referenced by subject category. The specific mitigation measures are identified, as well as the method and timing of verification and the responsible party that would ensure that each action is implemented.

The mitigation measures applicable to the project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, and/or reducing or eliminating impacts over time by maintenance operations during the life of the action.

PRC Section 21081.6 requires the Lead Agency, for each project that is subject to CEQA, to monitor performance of the mitigation measures included in any environmental document to ensure that implementation takes place. The County of San Diego Department of Parks and Recreation (DPR) is the designated Lead Agency for the MMRP. The County DPR is responsible for review of all monitoring reports, enforcement actions, and document disposition. The County DPR would rely on information provided by the monitor as accurate and up to date and would field check mitigation measure status as required.

A record of the MMRP will be maintained at County of San Diego DPR, 5510 Overland Avenue, Suite 270, San Diego, CA 92123. All mitigation measures contained in the MND shall be made conditions of the project as may be further described below.

Format

Mitigation measures applicable to the project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, and/or requiring supplemental structural controls. Within this document, approval mitigation measures are organized and referenced by subject category. Each of the mitigation measures has a numerical reference. The following items are identified for each mitigation measure.

- Mitigation Language and Numbering
- Mitigation Timing
- Methods for Monitoring and Reporting
- Responsible Parties

Mitigation Language and Numbering

This MMRP provides the language of the mitigation measure in its entirety.

Mitigation Timing

The mitigation measures required for the project will be implemented at various times before construction, during construction, prior to project completion, or during project operation.

Methods for Monitoring and Reporting

The MMRP includes the procedures for documenting and reporting mitigation implementation efforts. As the project proponent, the County of San Diego DPR is responsible for implementation of all mitigation measures.

Responsible Parties

For each mitigation measure, the party responsible for implementation, monitoring and reporting, and verifying successful completion of the mitigation measure is identified.

Critical Project Design Elements

Critical Project Design Elements are contained in Table MMRP-2 below. The project design elements assume compliance with specific environmental laws and regulations and were essential in reaching the conclusions within the MND. While the Critical Project Design Elements are not technically mitigation measures, their implementation must be assured to avoid potentially significant environmental effects. The party responsible for implementation, monitoring and reporting, and verifying successful completion of the Critical Design Element is also identified. The following items are identified for each Critical Project Design Element

- Design Feature
- Design Feature Timing
- Responsible Parties

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
IV. Biological Resources				
<p>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.</p> <p>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 a 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.</p> <p>Mitigation will consist of on- or off-site preservation, translocation, and/or restoration within a BRCA, with a preference for species salvage and transplantation 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.</p>	<p>Prior to vegetation clearing and during the blooming period for this species (April – May)</p>	<p>Conduct pre-construction focused survey</p>	<p>Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>

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Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>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 transplantation 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.</p>	<p>Prior to vegetation clearing</p>	<p>Prepare plant salvage and translocation plan</p>	<p>Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>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, 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, 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, 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,</p>	<p>Prior to vegetation clearing during the coastal California gnatcatcher breeding season (March 1 to August 15), pre-construction no more than three days prior to the commencement of activities, grading and during construction</p>	<p>Conduct pre-construction surveys, noise monitoring prior to/during construction if necessary</p>	<p>Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>

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and/or the qualified biologist monitors the active nest during clearing, grubbing, 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, 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, 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, grading, and/or revegetation shall be allowed to proceed. Furthermore, if 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 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, 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.	Prior to vegetation clearing during the general avian breeding season (February 1 to September 15), or raptor breeding season (January 15 to July 15), pre-construction no more than three days prior to the commencement of activities, grading and during construction	Conduct pre-construction surveys, noise monitoring prior to/during construction if necessary	Qualified biologist provided by the County of San Diego DPR	County of San Diego DPR

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<p>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, 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 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.</p>	<p>Prior to construction, during construction</p>	<p>On- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.</p>	<p>Contractor, Qualified biologist provided by the County of San</p>	<p>County of San Diego DPR</p>
<p>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 [<i>Allium</i> spp.] and goldenstar [<i>Bloomeria crocea</i>]) 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.</p>	<p>Prior to construction, during construction</p>	<p>On-site restoration</p>	<p>Contractor, Qualified biologist provided by the County of San</p>	<p>County of San Diego DPR</p>

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<p>MM-BIO-7: Mitigation for permanent impacts to Potential Hermes Copper Butterfly Habitat 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.</p>	Prior to construction, during construction	On- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.	County of San Diego DPR	County of San Diego DPR																																				
<p>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 pre-construction surveys.</p>	Prior to construction, during construction, not during Hermes flight season (defined as the mid-May through the mid-July)	Pre-construction surveys and avoidance and minimization measures, consultation with USFWS if needed	Qualified biologist provided by the County of San Diego DPR, USFWS	County of San Diego DPR																																				

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Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>Step 1: Survey</p> <ul style="list-style-type: none"> • 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. <p>Step 2: Avoidance and Minimization Measures</p> <ul style="list-style-type: none"> • 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. 				

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Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<ul style="list-style-type: none"> Install signs and/or fencing along the avoided host plants stating, "Environmentally sensitive area. Please stay on trail," or similar language. <p>Step 3: Compensatory Mitigation</p> <p>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.</p>				
<p>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 pre-construction plant mapping.</p> <p>Step 1: Survey</p> <ul style="list-style-type: none"> 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. <p>Step 2: Avoidance and Minimization Measures</p> <ul style="list-style-type: none"> Following host plant mapping, realign or leave potential impact areas unimproved, as needed, to avoid direct impacts to host plants as much as possible. 	<p>Prior to construction, during construction, not during Quino flight season (defined as the third week of February through the second Saturday in May) along Rock and Roll Trail (#22) segment</p>	<p>Pre-construction surveys and avoidance and minimization measures, consultation with USFWS if needed</p>	<p>Qualified biologist provided by the County of San Diego DPR, USFWS</p>	<p>County of San Diego DPR</p>

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<ul style="list-style-type: none"> • 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. <p>Step 3: Compensatory Mitigation</p> <p>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.</p>				
<p>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.</p>	<p>Prior to construction</p>	<p>Conduct pre-construction focused survey</p>	<p>Qualified biologist provided by the County of San</p>	<p>County of San Diego DPR</p>

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Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>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.</p>	<p>Prior to construction, during construction</p>	<p>Installation of temporary environmental fencing</p>	<p>Contractor, Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>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 live 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 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.</p>	<p>Prior to construction, during construction</p>	<p>On- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.</p>	<p>Contractor, Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>

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<p>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-BIO6). 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.</p>	<p>Prior to construction, during construction</p>	<p>On- and/or off-site preservation, restoration, and/or purchase of mitigation credits at an approved mitigation bank.</p>	<p>Contractor, Qualified biologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>
V. Cultural Resources				
<p>MM-CUL-1: Cultural resources CA-SDI-9706, -19170, -19171, -19181, -21921, -21922, and -21923; P-37-024271, -028924, -030084, -035980, -035992, -038958, -038959, and -038960 shall be identified as environmentally sensitive areas (ESAs) in order to ensure no adverse impacts to the resources occur.</p> <ul style="list-style-type: none"> • The ESAs shall consist of the recorded site boundary and a 20-foot buffer. • The ESA locations shall be provided to the proposed project development team and the ESA locations shall be avoided by all 	<p>During preparation of trail plans, prior to activities involving ground disturbance, during construction</p>	<p>Include in trail plans and H RTP if applicable; flag high ESAs and buffer areas</p>	<p>Qualified archaeologist provided by the County of San Diego DPR, County of San Diego DPR</p>	<p>County of San Diego DPR</p>

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<p>project design considerations for new trail segments and existing trail segments to be improved.</p> <ul style="list-style-type: none"> • If during trail segment engineering, it is determined that avoidance of an ESA proves infeasible, a Historical Resources Treatment Plan (H RTP) shall be prepared. The H RTP will present the measures that will be implemented, and include appropriate methodologies, to address the preservation, minimization of impacts, or mitigation of potential impacts/adverse effects to significant cultural/historical resources. The County shall approve the H RTP prior to final engineering design, and all cultural resources investigations and reporting deliverables outlined in the H RTP shall be completed prior to trail segment construction. • During the proposed project’s construction, no ground disturbance shall occur within the boundary of the ESA unless otherwise addressed in the H RTP. During restoration efforts within trail routes to be closed, only passive revegetation shall occur within the boundary of the ESA. Archaeological monitors will be present during initial activities to confirm the ESA and buffer around each resource and ensure there are no direct or indirect impacts to the resources. • During the proposed project’s construction activities, the ESAs and buffer areas shall be temporarily flagged by the project archaeologist prior to construction activities occurring in the vicinity of the ESA. • All construction activities within 100 feet of an ESA shall be monitored by an archaeological monitor; in addition, all construction activities within 100 feet of an ESA surrounding prehistoric archaeological resources shall be monitored by a Kumeyaay Native American monitor. 				

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>MM-CUL-2: The County DPR will retain a qualified project archaeologist and a Kumeyaay Native American representative to monitor all initial ground-disturbing activities related to the implementation of the proposed project in order to minimize impacts to unknown subsurface archaeological deposits. Specifically, the following measures will be implemented to reduce impacts:</p> <ul style="list-style-type: none"> • Prior to the start of construction, the project archaeologist shall prepare a monitoring plan that describes the nature of the archaeological monitoring work; a monitoring schedule and a map illustrating ESA boundaries (MM-CUL-1) and areas where monitoring shall occur; procedures to follow in the event of an unanticipated discovery; and reporting requirements. • The monitoring program shall include attendance by the archaeologist and Native American monitor at a pre-construction meeting with the construction contractor to discuss monitoring scheduling and coordination and to inform all personnel of the high probability of archaeological materials being encountered during construction. • Both archaeological and Native American monitors shall have the authority to temporarily halt or redirect grading and other ground-disturbing activity in the event that cultural resources are encountered. Isolates and non-significant deposits shall be minimally documented in the field. If significant cultural material is encountered, appropriate actions shall be implemented according to the protocols outlined in the monitoring plan. 	<p>Pre-construction, prior to ground disturbing activities, during construction</p>	<p>Retain a qualified archaeologist/ cultural resource specialist and a Native American representative for monitoring, and pre-construction meeting</p>	<p>Qualified archaeologist provided by the County of San Diego DPR, Native American representative</p>	<p>County of San Diego DPR</p>

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>MM-CUL-3: Should human remains be identified during ground-disturbing activities related to the proposed project, whether during construction, maintenance, or any other activity, California Public Resources Code §5097.98, CEQA Guidelines §15064.5 and California Health & Safety Code §7050.5 and County-mandated procedures will be followed for the treatment and disposition of those remains, as follow:</p> <ul style="list-style-type: none"> • A County (DPR) official is contacted. • Upon identification of human remains, there will be no further excavation or disturbance in the area of the find or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor. • If the remains are determined to be of Native American origin, the coroner will contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will identify a Most Likely Descendant (MLD), the person or persons it believes to be most likely descended from the deceased Native American. • The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted. • The MLD, as identified by the NAHC, shall be contacted by DPR or their representative in order to determine proper treatment and disposition of the remains. The MLD may make recommendations to the landowner (DPR), or the person responsible for the excavation work, for the treatment of human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. 	During construction	Notify a County DPR official	Qualified archaeologist provided by the County of San Diego DPR, Native American representative	County of San Diego DPR
VII. Geology and Soils				
<p>MM-PAL-1a. The County will retain a qualified paleontologist. A qualified paleontologist is defined as an individual having an M.S. or Ph.D. degree in paleontology or geology who is familiar with paleontological procedures and techniques, is knowledgeable in the geology and paleontology of San Diego County, and who has worked as a paleontological mitigation project supervisor in the County for at least one year.</p>	Prior to construction	Retain a qualified paleontologist, and attend the pre-construction meeting	Qualified paleontologist provided by the County of San Diego DPR	County of San Diego DPR

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
<p>MM-PAL-1b. A qualified paleontological monitor shall be on site on a full-time basis during the original cutting of previously undisturbed deposits in areas with high paleontological resource potential and sensitivity. A qualified paleontological monitor is defined as an individual having experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist. If the qualified paleontologist or paleontological monitor ascertains that observed exposures of the formations are not fossil-bearing, the qualified paleontologist shall have the authority to terminate the monitoring program.</p>	<p>During the original cutting of previously undisturbed deposits in areas with high paleontological resource potential and sensitivity</p>	<p>Monitor and inspect exposures for contained fossils</p>	<p>Qualified paleontologist and paleontological monitor provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>MM-PAL-1c. If fossils are discovered during monitoring, they shall be recovered by the qualified paleontologist or paleontological monitor. In most cases, fossil salvage can be completed in a short period of time, although some fossil specimens (such as a complete large mammal skeleton) may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for recovering small fossil remains, such as isolated mammal teeth, it may be necessary to set up a screen washing operation on the recovery site.</p> <p>If a fossil of greater than 12 inches in any dimension, including circumference, is encountered during excavation or grading, all excavation operations in the area where the fossil was found shall be suspended immediately, the County Planning and Development Services (PDS) Permit Compliance Coordinator shall be notified, the Project Paleontologist shall assess the significance of the find and, if the fossil is significant, the Project Paleontologist shall oversee the salvage program, including salvaging, cleaning, and curating the fossil(s), and documenting the find (as outlined below).</p>	<p>During the original cutting of previously undisturbed deposits in areas with high paleontological resource potential and sensitivity</p>	<p>Monitor and inspect exposures for contained fossils, recover discovered fossils</p>	<p>Qualified paleontologist and paleontological monitor provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>MM-PAL-1d. If any sub-surface bones or other potential fossils are found anywhere within the proposed project impact footprint by construction personnel in the absence of a qualified paleontologist or paleontological monitor, the qualified paleontologist shall be notified immediately to assess their significance and make further recommendations.</p>	<p>During construction</p>	<p>Notify the qualified paleontologist</p>	<p>Contractor, Qualified paleontologist provided by the County of San Diego DPR</p>	<p>County of San Diego DPR</p>

Table MMRP-1				
Mitigation Measure	Implementation Time Frame	Monitoring Method	Implementation Responsibility	Verification Responsibility
MM-PAL-1e. Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged as part of the mitigation program.	During construction and monitoring	Clean, repair, sort, and catalog fossil remains if found	Contractor, Qualified paleontologist provided by the County of San Diego DPR	County of San Diego DPR
MM-PAL-1f. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections such as the San Diego Natural History Museum. Donation of the fossils shall be accompanied by financial support from the applicant for initial specimen storage.	During construction and monitoring, after construction	Deposit finds at scientific institution	Qualified paleontologist provided by the County of San Diego DPR	County of San Diego DPR
MM-PAL-1g: A final summary report outlining the results of the mitigation program shall be prepared by a qualified paleontologist and submitted to the County of San Diego for concurrence. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.	During construction and monitoring, after construction	Prepare filed summary report and submit to County of San Diego DPR	Qualified paleontologist provided by the County of San Diego DPR	County of San Diego DPR

Table MMRP-2			
Design Feature	Design Feature Timing	Implementation Responsibility	Verification Responsibility
<p>Air Quality:</p> <p>1. Although the project would not be subject to the County Grading Ordinance, the project would be consistent with dust control measures to reduce potential fugitive dust emissions during construction. During site preparation and grading construction phases, all soil excavated or graded would be sufficiently watered to prevent excessive dust. Watering would occur as needed with complete coverage of disturbed soil areas. Watering would occur a minimum of twice daily on unpaved roads and on disturbed soil areas with active operations. All haul trucks transporting soil to or from the project site would be covered to prevent fugitive dust emissions, and traffic speeds on all unpaved portions of the project site would be reduced to 15 miles per hour or less.</p>	<p>During construction</p>	<p>County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>Geology and Soils:</p> <p>1. Although the proposed project involves grading it is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING).</p> <p>2. The proposed project would comply with the State Water Resource Control Board National Pollution Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (i.e., General Construction Permit). Compliance with the General Construction Permit would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) outlining best management practices to prevent soil erosion and runoff from the construction site.</p>	<p>Prior to construction, during construction</p>	<p>County of San Diego DPR, SWRCB</p>	<p>County of San Diego DPR</p>

Table MMRP-2			
Design Feature	Design Feature Timing	Implementation Responsibility	Verification Responsibility
<p>Hazards and Hazardous Materials:</p> <ol style="list-style-type: none"> The proposed project will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because the proposed project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3 and Appendix II-A of the Uniform Fire Code. The County would post and enforce park facility regulations in accordance with the San Diego County Code of Regulatory Ordinances, Title 4 Public Property, Division 1. Parks and Recreation, Chapter 1. These rules include, but are not limited to the prohibition of smoking, campfires, open flames, and the prohibition of fireworks, firearms, weapons, air guns, archery devices, slingshots, or explosives of any kind across, in or into a County park. 	<p>Prior to construction, during construction, after construction</p>	<p>County of San Diego DPR</p>	<p>County of San Diego DPR</p>
<p>Hydrology and Water Quality:</p> <ol style="list-style-type: none"> The project would be covered under the County's existing regional Waste Discharge Requirement Permit as long as the project's site design measures and/or source control Best Management Practices (BMPs) are consistent with the San Diego County Jurisdictional Urban Runoff Management Program (JURMP). The project also requires a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activities. Compliance with the General Construction Permit would require the preparation of a SWPPP outlining BMPs that would be implemented during construction activities to prevent pollutants from entering nearby water bodies. The proposed project will comply with all requirements of these permits. 	<p>Prior to construction, during construction, after construction</p>	<p>County of San Diego DPR</p>	<p>County of San Diego DPR</p>

Table MMRP-2			
Design Feature	Design Feature Timing	Implementation Responsibility	Verification Responsibility
<p>Noise:</p> <p>1. The proposed project will not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36-410). Construction operations will occur only during permitted hours of operation pursuant to Section 36-410. Also, it is not anticipated that the proposed project will operate construction equipment in excess of an average sound level of 75 A-weighted decibels (dBA) between the hours of 7:00 a.m. and 7:00 p.m. Finally, it is not anticipated that the proposed project will operate construction equipment in excess of 75 dBA for more than 8 hours during a 24-hour period.</p>	<p>During construction</p>	<p>County of San Diego DPR</p>	<p>County of San Diego DPR</p>