Appendix D1

Multiple Species Conservation Program Conformance Statement

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT

Alpine County Park Project

December 2022

I. Introduction

The Alpine County Park Project would occur in Alpine, a community in south-central San Diego County, approximately 1.3 miles south of the intersection of Tavern Road and Interstate 8 and 1 mile east of the intersection of Tavern Road and South Grade Road. The project would consist of development of Alpine County Park and establishment of passive recreational opportunities within an adjacent open space area. Specifically, the County of San Diego (County) is proposing development of an approximately 23-acre active park, formalization of existing trails, as well as closure of existing trails, all within 96.6 acres of undeveloped County-owned land. The remainder of the project site would be conserved as open space.

Alpine County Park

The proposed Alpine County Park would involve development of an active park with amenities such as multi-use turf areas, a baseball field, an all-wheel park, bike skills area, recreational courts (i.e., basketball, pickleball), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area and a corral, nature play area, community garden, a volunteer pad, picnic areas with shade structures and picnic tables, game table plaza, and multi-use trails. An open parking area would accommodate approximately 250 to 275 vehicles. In addition, 10 Americans with Disabilities Act–compliant spaces would be available near the primary entrance and administrative building as well as in the eastern portion of the site along South Grade Road. Volunteer pad parking spaces, equestrian staging areas, and corrals would be in the northern portion of the project site.

The proposed project would include an equestrian staging area that would be graded and covered with decomposed granite, allowing it to be used for vehicle parking. This area would be in the northern portion of the active park, directly west of the north entrance. The equestrian staging area would provide parking spaces for five equestrian trailers. It would also have receptacles for waste and manure. A Manure Management Plan would be prepared for the proposed project.

One solid-surface volunteer pad is proposed in the northern portion of the park. A volunteer pad is a permanent staging area for a recreational vehicle or similar type of vehicle. One volunteer would live on-site full time to help with maintenance and management of the park. Proposed electric facilities at the administrative facility/ranger station would be extended to the volunteer pad.

All permanent exterior security lighting would be installed so that lamps and reflectors would not be visible beyond the project site. Furthermore, lighting would not cause excessive reflective glare, would be directed so as not to illuminate the night sky, would be minimized within the project facility and in its immediate vicinity, and would comply with local policies and ordinances. Outdoor lighting would be solar powered; photovoltaic panels would be mounted on overhead structures above the parking spaces within the proposed active park.

The proposed project would either connect to the existing sewer system or include a septic system to serve the restroom facilities, administration facility/ranger station, and volunteer pad. An on-site connection to the existing sewer line is the first of two options available for sewage disposal at the site. This option would involve connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road, near the intersection with Alpine Boulevard. The existing sewer line is served by the San Diego County Sanitation District. A pipeline would run from a force main to the restroom facility in the southern portion of the proposed park. The pipeline would be trenched along an existing road right-of-way, in the shoulder, and along the proposed parking area leading to the restroom building in the southern portion of the project site. Soil would be excavated, sand would be layered in the trench, and the pipeline would be laid. The trench would then be backfilled with the excavated material.

An on-site septic system is the second option for the disposal of sewage associated with the proposed project. The system would be in the northern portion of the project site, north of the equestrian staging area. Soil would be excavated to bury the septic tank underground. The size of the tank would be determined in the final design. However, it is anticipated that the proposed septic system would have the capacity for 5,000 gallons per day. Solids would be removed from the septic tank approximately once a week by truck. The system's filter treatment process would involve treatment, recirculation, and discharge stages. The standard septic system incorporates a dosing system to disperse liquids with use of a drip system. The septic system's drip lines would be placed at a depth of 12 inches. Effluent would be discharged to a treatment leach field with subsurface drip irrigation. The effluent would be transferred from the restroom facility to the leach field through a non-perforated pipe. The aboveground improvements associated with the treatment system would be a manhole and a cleanout at ground level.

Stormwater retention basins would be located throughout the park, and connection points for electricity would be located near the park's primary entrance. Water would be provided by Padre Dam Municipal Water District. It is not anticipated that natural gas will be used on the project site.

Construction would occur in multiple phases. The first phase may focus on the northern portion of the site. Construction equipment would include tractors, excavators, backhoes, a water truck, drill rig, bobcat, forklift, rollers, a rubber-tired loader, wheel tractor-scrapers, an air compressor, a generator set, crane, and concrete truck. Approximately 23 acres of grading would occur. The project site may be balanced with cut and fill or may require the import of soil to the site. The export of unsuitable material and/or rock may also be

required. The southern portion of the site would contain a retention basin. Compliance with the General Construction Permit would require preparation of a Stormwater Pollution Prevention Plan, which would outline the best management practices that would be implemented during construction to prevent soil erosion. Such practices would also prevent runoff from leaving the construction site and traveling to nearby water bodies.

Open Space and Passive Recreation

Approximately 1.1 miles of existing multi-use trails and access roads west and north of the proposed Alpine County Park would be maintained in perpetuity. These trails are currently within existing disturbed or bare ground; therefore, vegetation removal is not anticipated. Periodic maintenance of the trails would occur; this may include minor trail improvements, such as the installation of water breaks. The County would maintain access through the preserve by installing signage that clearly identifies public access areas. Signs would be installed in the least sensitive areas possible. Construction of access control gates (e.g., at the southern end of the County parcel, at the boundary with Wright's Field) may be required, resulting in minor ground disturbance involving less than 50 square feet.

The length and location of the 1.1 miles of trails and access roads described above may be modified by the County if required to ensure public health and safety or resource protection, respond to user preferences, or adapt to physical conditions. Realignment of trails would occur only within scrub habitats in the northern portion of the project site, areas that are less desirable for Quino checkerspot butterfly (QCB). No trail realignments would occur in the southern portion of the project site. Trail realignment activities are not intended to create new trails. The County would restrict access (i.e., close) to approximately 3,300 feet of existing trails throughout the preserve, allowing those areas to revegetate and stabilize naturally. The County would use signage and barriers such as vegetation, rocks/boulders, or fencing to restrict access to closed trail areas.

Operations and Maintenance

The proposed project would be open to the public from sunrise to sunset. Dogs on leashes would be allowed within all areas of the park, and off-leash dogs would be permitted within the dog park. During operation, "no parking" signs may be installed along the shoulder of South Grade Road, if deemed necessary by the Department of Public Works Traffic Division, to prevent potential overflow parking on South Grade Road. The proposed project would require one on-site ranger, two maintenance people, and one volunteer. The volunteer would live on-site full time to help with maintenance and management of the property.

Current Fuel Reduction Zones. In accordance with the County Consolidated Fire Code and the Alpine Fire Protection District Ordinance, the County is clearing vegetation within the fire fuel reduction zones outlined below, which, historically, have been cleared per the direction of the Alpine Fire Protection District. These recommendations are also contained within the Fire and Emergency Operational Assessment (FEOA) prepared by Rohde & Associates.

- At the far northeastern edge of the County's parcel where it abuts residences along Engelmann Oak Lane, 100 feet south of their property lines. This area is cleared of vegetation and mapped as disturbed habitat.
- Along South Grade Road, within 30 feet of the road edge along the County's parcel. This area includes predominantly Valley needlegrass grassland and smaller stands of open Engelmann oak woodland at the northern and eastern edges of the County's property, then transitions to denser scrub vegetation within moderate to steep slopes and three Engelmann oak trees toward the southern and western edges of the County's property. No Engelmann oaks would be removed as part of these activities.

Fire Fuel Reduction Zone as Part of the Project. Along South Grade Road, where the boundary for Alpine County Park would be adjacent to the road, an additional 20 feet would be part of the fire fuel reduction zone along the western and northern portion of the road. The fire fuel reduction zone would occur within the current footprint of the proposed park. An additional 20 feet of fire fuel modification would also be required along South Grade Road, approximately 100 feet south of the northeastern corner of the County's parcel adjacent to the Native Habitat Avoidance Area.

Fire fuel clearance would occur within 100 feet of the volunteer parking pad in the northern portion of the proposed active park. Per the FEOA, both a Zone A (30 feet) and Zone B (100 feet) fire fuel clearance would be required. Within 30 feet of the volunteer parking pad, the area would be cleared to Zone A standards, resulting in "landscape replacement" per the FEOA. No Engelmann oak trees occur within Zone A. Zone B fire clearance should achieve at least a 75 percent reduction in fire-line intensity from a wildfire, which would be accomplished in this area by removing shrub fuels (predominantly flat-topped buckwheat) at a minimum of 50 percent and grass/herb fuels at a minimum of 80 percent. Canopies associated with four Engelmann oaks occur within the Zone B area. Engelmann oaks may require canopy trimming to meet the minimum 10- to 15-foot separation distance required in the FEOA for Zone B areas, in coordination with a certified arborist.

II. Impact Summary

Implementation of the project would have two classes of impacts that would be relevant to the Multiple Species Conservation Program (MSCP): 1) permanent direct impacts on vegetation communities and the sensitive plants living in them, along with the resulting loss of habitat for sensitive animals, and 2) indirect effects on certain sensitive animal species from increased public presence over the long-term during operation of the passive recreational opportunities.

Habitat Impacts

Complete development of the project could result in permanent impacts on up to 22.4 acres of native habitats, which represents approximately 4.9 percent of the total available open space and conserved lands within the immediate vicinity of the project. These existing open space and conserved lands include the Wright's Field Preserve, privately held open space lands, lands with conservation easements, and the proposed Alpine Park Preserve.

Implementation of a septic system and associated leach field to process sewage from the proposed restroom facilities could result in up to 0.1 acre of additional permanent impacts on disturbed habitat. These permanent impacts are anticipated from the septic field, which would be graded and prepared during construction to receive sewer effluent and maintained as a septic field.

Implementation of the sewer system is not anticipated to result in significant impacts on habitats because the proposed sewer main would be installed within existing roadways (i.e., South Grade Road) or paved areas within the Alpine County Park wherever feasible. Table 1, below, summarizes the maximum potential impacts on habitat types/vegetation communities from development the project, including the multi-use trails and septic system.

Sensitive Plant Impacts

Implementation of the project could result in permanent and direct impacts on two sensitive plant species: decumbent goldenbush and Palmer's grappling hook. Decumbent goldenbush could be directly affected at one location in the north-central portion of the proposed Alpine County Park, within an area that supports approximately 110 individuals and covers approximately 3,500 square feet. These impacts would be significant on the existing population of decumbent goldenbush without mitigation. The remaining individuals would be protected in perpetuity by establishment of the Alpine Park Preserve. Areas identified as "Native Habitat Avoidance Area" are within the generalized boundary of the proposed Alpine County Park and would not be subject to mass grading or vegetation removal during site preparation activities. These areas are at the northern end of the proposed park, adjacent to the proposed equestrian staging area. The County would also implement **MM-BIO-1**, which would require salvaging on-site plants and replacing lost individuals a 3:1. After implementation of this mitigation measure, there would be no net loss of individuals and no substantial adverse effects on local long-term survival of the species.

Table 1. Maximum Project Impacts on Habitat/Vegetation Communities

Vegetation Community/Land Cover[a]	Tier[c]	Area in Acre(s)						
		Permanent Impacts[e]			Temporary Impacts		Impact Neutral	Total
		Alpine County Park[d]	Leach Field	New Fire Fuel Modification Areas	Native Habitat Avoidance Area	Sewer Pipe	Maintenance of Existing Trails	
Disturbed Habitat (11300)	IV	0.5	0.1	< 0.1	< 0.1	—	1.0	1.6
Diegan Coastal Sage Scrub (32500), Including Disturbed and Baccharis Dominated (32530)	II	< 0.1	—		< 0.1	—	—	< 0.1
Disturbed Flat-topped Buckwheat (32800)	II	1.6	0.3	0.3	1.0	< 0.1	—	3.2
Flat-topped Buckwheat (32800)	II	1.7	—	0.1	0.7	< 0.1	—	2.4
Flat-topped Buckwheat – Existing Fire Fuel Modification Zone (32800)	II	< 0.1	—		--	—	—	< 0.1
Coastal Sage-Chaparral Transition (37G00)	II	—	—		--	—	—	—
Southern Mixed Chaparral (37120)	III	—	—		--	—	—	—
Valley Needlegrass Grassland (42100)	I	14.4	—		< 0.1	—	—	14.5
Valley Needlegrass Grassland – Existing Fire Fuel Modification Zone (42100)		0.3	—		—	—	—	0.3
Disturbed Valley Needlegrass Grassland (42100)	I	—	—		—	—	—	—
Non-native Grassland (42220)	III	3.6	—		—	—	—	3.6
Open Engelmann Oak Woodland (71181)	I	—	—	0.1	0.4		—	0.5
Non-native Woodland (79000)	IV	< 0.1	—	< 0.1	< 0.1		—	< 0.1
Eucalyptus Woodland (79100)	IV	—	—		—		—	—
Total[b]		**22.2**	**0.4**	**0.5**	**2.1**	**< 0.1**	**1.0**	**26.1**

a. Vegetation categories and numerical codes are from Holland (1986) and Oberbauer et al. (2008).
b. Individual rows may not sum to total because of rounding.
c. Tier categories are defined in the County's Biological Mitigation Ordinance.
d. The additional 20-foot fire clearance zone where the park footprint is adjacent to South Grade Road is within the current Alpine Park footprint, so no additional impacts would occur beyond what is shown below.
e. An additional 471 square feet of impacts on sensitive natural communities would occur from implementation of the western spadefoot mitigation measure (**MM-BIO-4**) requiring the construction of three basins for spadefoot. It is not known exactly where these basins would be constructed, but the County would endeavor to place these in areas with non-native grasses or flat-topped buckwheat and avoid native grassland areas. Impacts associated with construction of the basins would be mitigated in accordance with **MM-BIO-9**.

Approximately 13,857 Palmer's grapplinghook individuals were observed during special-status plant surveys in 2019. Of the 13,857 individuals, 200 would be affected by the project, representing approximately 1 percent of the on-site population. Given the small number of individuals affected, the relatively large number of individuals in the entirety of the study area, and the available habitat that would be protected in perpetuity in the preserve, impacts would not result in a regional decline in the species and therefore would be less than significant. No impacts on chocolate lily would occur, either directly or indirectly, because all chocolate lilies occur more than 200 feet from the proposed Alpine County Park.

No direct removal of any Engelmann oaks would occur with implementation of the project. Canopy thinning may be required for seven oaks within the new fire fuel management zones proposed as part of the project, in coordination with a certified arborist. Four of these oaks are in the Zone B fire fuel reduction zone where canopy thinning for some oaks may be required. The other three oaks are directly west of South Grade Road, in a 20-foot area where fire fuel management would be extended west from the existing fire fuel management area along South Grade Road. Indirect impacts may result from grading activities within the root protection zone of 25 Engelmann oaks. Impacts would not occur within the dripline/canopy of the trees. Approximately 0.94 acre would be within the root protection zone where grading/site preparation (e.g., compaction) and the construction of park infrastructure would occur. The County would implement **MM-BIO-2**.

Short-term indirect impacts on decumbent goldenbush, Palmer's grapplinghook, and Engelmann oak could occur during construction because each of these sensitive species occurs adjacent to areas where the proposed Alpine County Park would be built. These three species all occur within at least 200 feet of proposed construction activities. Absent any dust control measure, construction-related indirect impacts could include dust deposition, which could alter the photosynthetic vigor of individual plants, and the potential spread of invasive species into the preserve from the construction area. These short-term indirect impacts could become permanent if invasive non-native species become established and are not eradicated. However, dust control measures would be required for this project, in addition to weed abatement by County personnel. Therefore, impacts would not be anticipated.

Other potential long-term indirect impacts include a higher likelihood for plants being trampled because of an anticipated increase in trail users and anthropogenic presence in the preserve compared to baseline conditions. There is also potential for unauthorized activities to occur, such as trail building or the establishment of new trails in areas. However, the public is currently walking and, at times, parking on the County's property; therefore, these impacts are not expected to be appreciably greater after construction of the proposed park. Moreover, the County has proposed additional signage and a live-in volunteer and park rangers to monitor the Alpine Park Preserve and Alpine County Park, along with a formalized staging area for parking, which would minimize impacts on special-status species from unauthorized trail activities (e.g., off-trail trampling, building of jumps/berms within the trails, parking in unauthorized areas). After implementation of the proposed project, it is anticipated that fewer long-term impacts on special-status plants would occur compared to baseline conditions. In addition, it is anticipated that

fewer long-term impacts on special-status plants would occur compared to baseline conditions.

Other sensitive species documented within the project area include chocolate lily, delicate clarkia, San Diego County viguiera, small-flowered microseris, and Southern California black walnut. No direct or indirect impacts on these species are anticipated because they would be more than 200 feet from the proposed Alpine County Park and within areas proposed for permanent protection and long-term management within the preserve.

Sensitive Wildlife Impacts

Invertebrates

QCB, a special-status butterfly, is known to occur in the project area; however, the project is not within a recovery area or designated critical habitat for QCB (U.S. Fish and Wildlife Service [USFWS] 2003). Protocol surveys for adult QCB were conducted in the project area in 2019 and 2020. Two adult QCB were observed in the survey area in April 2019 and March 2020. The USFWS QCB survey guidelines (USFWS 2014, p. 2) state that surveys shall continue "until a Quino is detected." Therefore, QCB surveys could have been discontinued after the seventh week, but four additional surveys were conducted to provide additional depth and understanding regarding the degree to which QCB utilizes the site.

The project would result in impacts on approximately 22.4 acres of QCB-occupied habitat, consisting of two of the seven locations (29 percent) where QCB adults were observed on the project site or on Wright's Field in the past, including the observation made in 2010, as documented in the USFWS Carlsbad Fish and Wildlife Office GIS data (USFWS 2020) and during surveys in 2019 and 2020. Both locations would be affected by construction of Alpine County Park. No locations would be affected by maintenance of the existing trails. Five locations[1] (71 percent) where QCB adults were observed in the past would be permanently protected within either the Wright's Field Preserve or the proposed preserve.

Incidental take of QCB could occur from harassment, harm, injury, or mortality. Direct impacts that could result in incidental take of QCB would occur through the permanent removal of habitat, which is expected to be completed in the first year of project implementation. There is also potential for inadvertent take of a small number of QCB in the preserve when implementing the habitat management activities anticipated as part of the Habitat Conservation Plan's (HCP's) conservation measures, which may include on-site enhancement and restoration of dot-seed plantain (*Plantago erecta*) occurrences. It is anticipated that site preparation activities tied to habitat restoration could result in accidental trampling of QCB larvae and host plants during monitoring and or trail management. The project is not within a recovery area or designated critical habitat for QCB (USFWS 2003). The project would implement **MM-BIO-3**.

[1] This includes two observations from 2019, two observations from 2020, and one observation from the California Natural Diversity Database recorded in 2010 in the southwest portion.

Habitat for an additional special-status butterfly, Hermes copper butterfly, exists on-site. Presence/absence surveys for the Hermes copper butterfly (*Lycaena hermes*) were performed per County guidelines in 2019 and 2020. In 2019, surveys were conducted only within the County-owned parcels. In 2020, surveys were repeated within the County-owned parcels and within suitable habitat on the 231-acre Wright's Field property, directly adjacent west of the County property. Surveys were conducted where the larval host plant, spiny redberry (*Rhamnus crocea*), occurs in proximity (within 15 feet) to California buckwheat (*Eriogonum fasciculatum*), their primary nectar plant (i.e., suitable habitat). Because Hermes copper butterfly has been observed using various other species as a nectar source (USFWS 2020), suitable habitat for Hermes copper butterfly has been modified to include areas where the host plant occurs, regardless of whether it is found in proximity to California buckwheat.

Hermes copper butterfly was not observed within the project site during comprehensive surveys in 2019 and 2020 and determined to have low potential to occur on the project site; therefore, impacts on this species from the proposed project are not anticipated to occur. No impacts on the Hermes copper butterfly host plant, spiny redberry, would occur from construction of the proposed Alpine County Park, establishment of new fire fuel reduction areas, or maintenance of existing trails. The project would, however, affect 20.3 acres of proposed designated USFWS critical habitat for Hermes copper butterfly. Because the site is currently unoccupied by Hermes copper butterfly, impacts on critical habitat for the species would be less than significant. USFWS will consider impacts on Hermes copper butterfly critical habitat resulting from the project as part of its review of the HCP the County is preparing to address impacts on QCB.

Two species of federally listed endangered fairy shrimp are known to occur in San Diego County: San Diego fairy shrimp (*Branchinecta sandiegonensis*) and Riverside fairy shrimp (*Streptocephalus woottoni)*. Twenty-eight basins were observed in the study area during the wet season; these supported inundation for at least 30 days in 2018–2019, which is enough time for these two species to reach maturity. No fairy shrimp individuals of either local species (San Diego fairy shrimp and Riverside fairy shrimp) were observed during wet-season sampling within the 28 sampled pools. No fairy shrimp cysts were observed in any of the 28 sampled pools in the 2019 dry-season sampling. Federally listed endangered fairy shrimp species were not observed within the project site during comprehensive surveys during 2019 and 2020. The species were determined to have low potential to occur within the project site; therefore, impacts on this species from the proposed project are not anticipated to occur.

Reptiles and Amphibians

Special-status reptiles, consisting of Belding's orange-throated whiptail, Blainville's horned lizard coastal western whiptail, red-diamond rattlesnake, and Western spadefoot, were observed within the study area. Baja California coachwhip, California glossy snake, coast patch-nosed snake, Coronado skink, and Southern California legless lizard were not observed during surveys but have moderate to high potential to occur within the survey area. These species could be directly and indirectly affected through construction of Alpine County Park. Direct impacts would include the conversion of up to 22.4 acres of

native and naturalized habitat that could support these species due to development of the park and construction activities if individuals are in the project footprint. Indirect impacts on these species in adjacent areas could occur during construction of the project and include increased dust from grading and construction, increased noise and vibration from construction crews and equipment, and increased foot traffic during construction. Dust suppression and stormwater pollution prevention best management practices would be implemented throughout construction to minimize any potential impacts. Through implementation of the project, with its formalized trails, on-site volunteer, County rangers, trash cans, bathrooms, signs, and designated staging area for parking, the current foot traffic would be reduced in the undesignated areas that the public is currently accessing, either on foot and/or in vehicles. As part of project implementation, the proposed preserve portion of the County property, in addition to the other adjacent open space and preserved land, would provide habitat for the aforementioned species. The project would implement **MM-BIO-9** and **APM-BIO-1**.

Habitat for western spadefoot exists in the northern perimeter of the study area. A survey conducted in 2022 determined that the seasonally inundated basins within the County's parcel are associated primarily with the trails that exist along the northern perimeter of the study area. Approximately 48 ponded areas were surveyed within or adjacent to dirt access roads, of which approximately 35 were mapped within the County's parcel and 13 were mapped on Wright's Field. During 2022 surveys, no western spadefoot adults, larvae, or eggs were observed during surveys of seasonally inundated basins within the County's parcels. It was determined that two basins on Wright's Field (WF-6 and WF-7) are the primary breeding pools for western spadefoot within the survey area, although successful western spadefoot recruitment was not observed in 2022. Basins within the County's parcel are too shallow and/or do not hold water long enough to support western spadefoot breeding activities during all but the wettest years. Three adults were observed within the County's parcel during the nocturnal survey on March 4, 2022, on the west side of the County's parcel, within approximately 70 to 150 meters of the basins on Wright's Field and more than 250 meters away from the closest inundation areas. It appears that the County's parcel provides upland habitat for western spadefoot. No spadefoots were observed within the project footprint during surveys in 2022.

In 2019, one breeding pool of approximately 157 square feet (AP-7) was documented within the active park development footprint; this may be utilized by western spadefoot seeking to expand from the core population on Wright's Field Preserve during exceptionally wet years, such as 2019 when an egg mass was observed in AP-7. AP-7 would be removed during construction of the active park. Therefore, a western spadefoot breeding pool may be affected by the project. Impacts on this potential breeding pool would be significant, absent mitigation. The project would implement **MM-BIO-4.**

Adult western spadefoot emerge a few nights per year to forage and breed (San Diego Management and Monitoring Program 2022); these activities are most likely to occur within the same general area as burrowing habitat. Because these foraging and breeding events would happen in the evening when construction equipment would not

be active, it is unlikely that direct impacts on western spadefoot, such as crushing or illegal collecting, would occur during foraging and breeding events. However, the possibility exists that estivating western spadefoots would occur within the proposed project footprint where grading would occur, and individuals could be crushed from construction equipment. These impacts would be significance, absent mitigation. The project would implement **MM-BIO-4.**

Birds

Construction of Alpine County Park could have potential permanent direct impacts and indirect impacts on avian species endemic to the region. Burrowing owl, a California Species of Special Concern; California Cooper's hawk, a California Species of Special Concern; red-shouldered hawk, a County Group I species; and western bluebird, a County Group 2 species, were observed in the study area during protocol surveys in 2019 and 2020 and could be affected by the project.

California gnatcatchers (*Polioptila californica californica*) were not observed within the project site during USFWS protocol presence/absence focused surveys conducted during 2019 or during other biological surveys conducted for the project. The study area is at the far eastern extent of the known range of California gnatcatcher and possibly just east of the known current range for this species, based on species occurrence data from USFWS (USFWS Carlsbad Fish and Wildlife Office 2020), the California Natural Diversity Database (California Department of Fish and Wildlife [CDFW] 2020), and the SanBIOS database (San Diego Association of Governments 2020). In addition, the elevation and related weather extremes of the site may preclude occupation by California gnatcatcher. Therefore, California gnatcatchers were determined to have low potential to occur within the project site, and no impacts on California gnatcatcher from the proposed project are anticipated to occur.

Given the presence of suitable habitat within the project area, a habitat assessment and protocol surveys were conducted for burrowing owls (*Athene cunicularia*), in accordance with the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). Breeding burrowing owl was determined to have low potential to occur; as a result, impacts on this species are not expected to occur.

Special-status tree-nesting raptors documented within the study area include Cooper's hawk and red-shouldered hawk. Tree-nesting raptors have potential to nest in the mature vegetation in the study area, including trees such as Engelmann oak, coast live oak, and western sycamore, and forage in the grasslands and shrub/chaparral stands in the study area. White-tailed kite is a wide-ranging species with high potential to occur within the study area. Bell's sage sparrow, ferruginous hawk, grasshopper sparrow, and Southern California rufous-crowned sparrow all have a moderate potential to occur within the study area. Implementation of the project would result in the permanent loss of up to 22.4 acres of functional foraging and/or breeding habitat for these avian species in sensitive natural or naturalized vegetation communities. However, creation of the preserve would conserve functional foraging habitat for raptors in perpetuity.

Grassland obligate bird species, or avian species that strongly prefer open grassland habitats, also would be affected by the proposed project. These include the observed burrowing owl (observed wintering only), grasshopper sparrow, Oregon vesper sparrow, and ferruginous hawk. Approximately 19 acres of native and non-native grasslands used by these species are proposed to be removed during construction of the active park.

Bell's sage sparrow, a County Group I species; Lawrence's goldfinch, a Bird of Conservation Concern; and Southern California rufous-crowned sparrow, a County Group I species, could occur within the approximately 3.6 acres of open flat-topped buckwheat scrub stands in the proposed active park area. These species would experience permanent loss of habitat with construction of the active park.

Temporary direct impacts would occur during construction of the project. Expected impacts include increased dust from grading and construction, increased noise from construction crews and equipment, increased foot traffic during construction, and increased noise pollution from crews and equipment. This may temporarily alter the natural behaviors of avian species in the area.

The proposed preserve portion of the County property, in addition to the other adjacent open space and preserved land, and proposed grassland restoration would provide habitat for the aforementioned species through permanent habitat preservation. In addition, dust suppression and stormwater pollution prevention best management practices would occur throughout construction to minimize any potential impacts. Although the public is currently accessing the County property, through implementation of the project, with its on-site volunteer, County rangers, trash cans, bathrooms, signs, formalized trails, and designated staging area for parking, foot traffic would be reduced in the undesignated areas that the public is currently accessing, either on foot and/or in vehicles. The project would implement **APM-BIO-1, MM-BIO-5, MM-BIO-6, and MM-BIO-9.**

Mammals

The northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's woodrat (all County Group 2 species) were determined to have moderate potential to occur within the study area and the potential to be affected by implementation of the project. Suitable habitat for all three species can be found in the Valley needlegrass grasslands, non-native grasslands, and open flat-topped buckwheat scrub habitats within the study area and within the construction footprint of Alpine County Park. Grasslands and flat-topped buckwheat within the construction footprint would be directly affected and converted to a developed park, removing it as habitat that could support these species.

Temporary direct and indirect impacts on the aforementioned species are expected to occur during and post-construction of the project. Temporary direct impacts on these species include possible accidental take due to construction activities, increased dust from grading and construction, increased noise from construction crews and equipment, and increased foot traffic during construction. Natural behaviors of these species could

be affected. Because these species are active mostly at night (Tremor et al. 2017), foraging habits are not anticipated to be significantly affected; however, the project may cause species to be active during the day to avoid construction activities. These forced disruptions to the circadian rhythm could have negative effects on their ability to regulate their temperature and metabolism, causing general stress to these individuals. The San Diego pocket mouse is known to utilize burrows as its form of shelter. Because this species is less active during the day, when construction would be most active, there is potential for impacts on this species, which might be resting in burrows.

Passive and active bat surveys were conducted in 2019 by professional bat biologist Drew Stokes using Titley Electronics Anabat bat detectors, the unaided ear, and visual techniques, including use of a handheld spotlight. Fifteen of the 22 known bat species in San Diego County were detected during 2019 surveys. Seven of these observed bats are listed as California Species of Special Concern: pallid bat, Townsend's big-eared bat, western red bat, western yellow bat, western mastiff bat, pocketed free-tailed bat, and big free-tailed bat. All these species, except the western yellow bat, are listed as San Diego County Group II species. Suitable roosting and foraging habitat for these species can be found on-site. Permanent direct and temporary indirect impacts on some or all of these bat species are expected to occur. Direct impacts on approximately 22.3 acres of sensitive habitats would remove foraging habitat for these bat species during vegetation clearing associated with construction of Alpine County Park. Implementation of the project would not affect any known maternal colony sites. However there may be potential for bats to use rock outcrops as maternity and/or roost sites as well as Engelmann oaks. No large rock outcrops would be removed as part of construction of the project. No oaks would be removed by project implementation, although limbing will be likely to occur as part of the fire protection; work would also occur within the root zones of oaks. The County is proposing restoration of native grassland and permanent preservation of a portion of the County property, in addition to active management on-site for the proposed preserve land and Alpine County Park. However, through design measures and on-site management with implementation of the project, in addition to mitigation measures **MM-BIO-7**, pallid bat boxes; **MM-BIO-8**, bat roost avoidance; **MM-BIO-9**, compensatory habitat-based mitigation; and **MM-BIO-10**, native grassland mitigation, as well as establishment of Alpine Park Preserve (**APM-BIO-1**), which would protect the remaining habitat for these species in perpetuity, the impact would be less than significant. The permanent protection of suitable bat foraging habitat within the Alpine Park Preserve would further reduce impacts on foraging bat species.

There are only two known pallid bat colony sites in San Diego County (Stokes 2018). The individuals observed during focused bat surveys are believed to belong to the maternal colony that roosts in Viejas on a private residence. This species has a specific foraging strategy and utilizes grasslands and open oak woodlands as its main foraging habitat. It has characteristics that affect its success with increased urbanization. This includes its tendency to fly at low altitude, its inability to fly long distances, and its specialized foraging strategies. As a result of these factors, the loss of pallid bat foraging habitat would result in a significant impact on the pallid bat. These significant impacts would be reduced to less-than-significant levels through implementation of **MM-BIO-7**, in addition to **MM-BIO-9** and **APM-BIO-1**.

Indirect impacts on bat species, such as disruption of foraging behavior, could occur if construction takes place during evening hours. Because bats are nocturnal species and construction is expected to occur during daytime hours, indirect impacts on these species due to construction activities would be minimal and would not be expected to alter natural behaviors. Maintenance of existing trails near or within oak woodlands would not be expected to alter the quality of forage or affect roosting habitat for these species because the trails occur within areas that are already disturbed bare ground.

Post-construction, the existence of Alpine County Park would increase the amount of anthropogenic influence in the areas immediately surrounding the park footprint. There is a possibility for increased littering and foot traffic within the park and the maintained trail system, which exists in habitat that could support special-status wildlife species. Other indirect impacts could include the introduction of non-native or invasive plant species, which could affect viable habitat if not maintained. These indirect impacts may cumulatively result in reduced use of habitat immediately surrounding the project footprint. There is also potential for unauthorized activities to occur along trails and affect special-status wildlife as well as special-status plants. Such activities could include unauthorized trail building or establishing new trails in areas.

The restoration efforts and active management of the proposed preserve portion of the project would assist in preventing the spread of invasive plants and benefit the native habitats the species rely on. Signs would be posted and the public would be subject to park rules within the proposed preserve land and the park to prevent impacts from domestic animals and horses within sensitive habitats. Ranger-led hikes would also assist the public in learning further about the resources the County proposes to protect in perpetuity and the importance of staying on designated trails and picking up after domestic animals. Impacts could be significant. The County has proposed additional signage, the formalization of existing trails, and a live-in park ranger to monitor the preserve and Alpine County Park, prevent illegal trail building, and maintain the existing trails (e.g., ensuring trash is cleaned up and the public is staying on formal trails), which would minimize impacts on special-status species from unauthorized trail activities. After implementation of the proposed project, it is anticipated that fewer long-term impacts on special-status wildlife and plants would occur compared to baseline conditions.

Project implementation would not reduce the likelihood of recovery of listed species. Although project implementation would result in impacts on occupied QCB habitat, those impacts would be mitigated through an incidental take permit (ITP) for impacts on occupied QCB habitat and the associated HCP and the Habitat Restoration and Enhancement Plan for the Project. The Section 10 species permitting process would ensure that there would be no reduced likelihood of recovery for QCB.

Jurisdictional Wetlands and Waterways Impacts

The proposed project would not result in impacts on jurisdictional wetlands or waterways. No state or federal wetlands or waters were mapped within the study area; therefore, no impacts on state or federal wetlands or waters would occur. The project would also avoid impacts on CDFW jurisdictional habitat because none is present.

Core Wildlife/Wildlife Corridors Impacts

An important consideration is the setting of a project site with respect to regional connectivity with undeveloped lands. Large blocks of contiguous habitat are important to support resident populations of plants and wildlife as well as provide suitable conditions for wildlife movement and dispersal. The study area and the adjacent Wright's Field are surrounded by low-density exurban residential development, which result in an island of habitat with limited connectivity to open space and other preserve areas. The project design was planned to reduce edge effects and preserve the existing island for wildlife and plants. The proposed project would be constructed at the eastern edge of this island of open space, leaving a smaller but similarly situated island of habitat west of the proposed park. Therefore, development of the project would not have a significant impact on wildlife corridors. The conversion of a maximum of 22.4 acres of native habitat to a developed park facility would not constrain wildlife movement because the park would be located adjacent to existing development on three sides. The Alpine County Preserve would be created on the western edge of the park and maintained in perpetuity as an MSCP preserve, and areas identified as "Native Habitat Avoidance Area" would be maintained within the generalized boundary of the proposed Alpine County Park. Impacts within the Native Habitat Avoidance Area would be considered temporary indirect impacts. Trails would be expected to be utilized by medium and large mammals for ease of movement through the preserve. No features would be constructed that would impinge on any movement areas, including ridgelines or canyons. These trails are currently within existing disturbed or bare ground; therefore, no vegetation removal is anticipated. Periodic maintenance of the trails would occur, which could include minor improvements, such as installation of water breaks. The County Department of Parks and Recreation (DPR) would maintain public access through the open space/preserve area by installing signage to clearly identify public access areas. Trail markers, fences/barriers, and benches would also be installed within disturbed areas, as needed. Signs would be installed in the least sensitive areas possible.

The project would affect up to 22.4 acres of native habitat within a core wildlife area. The project would not significantly affect or interfere with connectivity or wildlife corridors or affect the long-term viability of this core wildlife area, given the presence of adjacent intact preserve land. The project area and the adjacent Wright's Field are surrounded by low-density exurban residential development in all directions. The project area is also directly adjacent to a busy arterial road, South Grade Road, that already limits wildlife movement in the area to the south and east. As such, the proposed project would not significantly affect the viability of a core wildlife area. Furthermore, development of the project would not exclude any existing wildlife from accessing foraging habitat, breeding habitat, or water sources. Finally, creation of the Resource Management Plan, as well as limiting usage of the preserve to daytime hours, would further reduce impacts on the functioning of the preserve as a core wildlife area. In addition, the project would not create artificial wildlife corridors. The trails may be utilized by medium to large mammals, but the project would not modify or constrain any corridors on the preserve. The project would not propose any new nighttime lighting or nighttime usage of the preserve. Public access to the preserve would be limited to a low level and would not substantially increase noise within the preserve.

The project would not significantly impede nocturnal movement in wildlife corridors. Public access is proposed only during daylight hours, which would not affect the nighttime movement of medium to large mammals. Implementation of the project would not significantly constrain movement of reptiles, small mammals, or birds. The project would not significantly constrain the visual continuity of wildlife corridors or linkages. Development would be focused on the eastern edge of the existing open space adjacent to the busy South Grade Road.

III. Mitigation Measures

To reduce potentially significant impacts on biological resources to a less-than-significant level, the County proposes the following mitigation measures as part of the project:

Applicant Proposed Measure (APM) 1 – Establishment of the Alpine Park Preserve: As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with a Resource Management Plan. This plan will outline management activities to be carried out by the County. Activities likely to be included in the Resource Management Plan would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration on the preserve as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat, and the County will demonstrate its long-term commitment to species conservation within Alpine Park Preserve.

MM-BIO-1: Replace Decumbent Goldenbush. To mitigate for significant impacts on decumbent goldenbush, the County DPR shall replace at a 3:1 mitigation ratio any affected decumbent goldenbush individuals. Individual plants and/or seeds will be salvaged from the onsite population prior to the start of construction and installed within the open space/preserve. Plantings shall be monitored for a minimum of 3 years to ensure the 3:1 mitigation ratio has been met and that the planted individuals have properly established themselves. Seed/material from onsite populations may be contract grown to provide replacement plantings.

MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures. The following measures will minimize and avoid potential impacts on Engelmann oaks resulting from the Project:

1. Engelmann oaks within 50 feet of any mass grading shall be fenced entirely around the tree dripline to ensure that no construction activities, including equipment staging, vegetation grubbing, driving, or grading, occur within the tree's dripline. These restrictions shall be communicated to the construction contractor prior to work in this area.
2. To mitigate for any potential significant impacts to Engelmann oak trees, the County will monitor the health of all Engelmann oaks within 200 feet of the proposed Alpine County Park development footprint for 5 years following

construction. A certified arborist with experience monitoring oak health will conduct the monitoring. Mortality or serious declines in the health of the Engelmann oaks during these 5 years within this area will be mitigated at a 3:1 ratio, should significant impacts occur. Specifically, three Engelmann oaks will be planted for each oak tree that has died or is in serious decline. The mitigation would occur within on-site Engelmann oak woodland areas that will be permanently protected. Planting shall occur within either the Native Habitat Protection Area or within the northwestern portion of the open space preserve. All oak plantings must be certified pathogen free, including for *Phytophthora* species.

3. Any areas within the Engelmann oak root protection zone (i.e., all areas within 50 feet of Engelmann oak canopy) shall be identified on a map that is provided to the construction contractor. Any grading or construction activities within the root protection zone shall be monitored to minimize impacts on oaks to the maximum extent possible. Training shall be provided for the construction contractor by a biological monitor prior to the start of construction activities in this area. This training will detail ways that the construction contractor can reduce impacts as much as possible on Engelmann oaks within the root protection zone. The following avoidance and minimization measures must be implemented: (1) minimizing repetitive travel routes within the root protection zone, (2) restricting any long-term storage of heavy materials within the root protection zone, and (3) restricting work within the root protection zone when the ground is wet to avoid compaction as much as possible after a rain event. Additional avoidance and minimization measures not envisioned here that can be feasibly implemented during construction must be identified and implemented.

MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat. The County DPR shall seek a Section 10 ITP (or Section 7 ITP if there is a federal nexus) for impacts on QCB-occupied habitat. Regardless of the conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat by providing, at a minimum, on-site preservation of occupied habitat for QCB within the open space preserve as well as the assurance that no net loss of QCB host plants will occur because of the project. The County DPR shall ensure that there is no net loss of QCB host plants by performing on-site enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities will not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and include measures to restore and enhance QCB and provide permanent habitat protection and maintenance activities within the open space preserve.

As part of its ongoing monitoring, the County will demonstrate that QCB persists on the project site at the end of the 5-year restoration and enhancement period. If QCB can no longer be found on either the County's preserve or within the adjacent Wright's Field in a normal flight year at the end of the 5-year restoration period, the County will secure a specific off-site parcel that will contribute meaningfully to the species' long-term conservation.

MM-BIO-4: Western Spadefoot. The County will mitigate for impacts on one western spadefoot breeding pool encompassing approximately 157 square feet by creating three permanent basins encompassing a minimum of 471 square feet to support western spadefoot breeding. These constructed basins will be created within clay soils on the permanently protected lands on the County's parcel, no closer than 100 feet from the western edge of the Alpine County Park. Basins will be constructed within approximately 262 meters of the core breeding population on Wright's Field to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins. No basins will be constructed within the areas proposed for QCB habitat enhancement activities.

Hydrological analysis will be conducted prior to site selection to map the micro-watersheds in potential sites and ensure the constructed basins fill naturally with rainwater. Basins will be constructed to allow for maximum inundated depths of approximately 18 to 24 inches (20 to 60 centimeters), with the goal that they remain inundated long enough to increase the chances for breeding to be successful during dry years. Conversely, the newly constructed basins shall be designed in such a way that they support standing water only for several weeks following seasonal rains so that aquatic predators (e.g., fish, bullfrogs, crayfish) cannot become established. Because the ponding duration is so critical to the success of this effort, additional studies may be needed to estimate infiltration rates, soil profile, depth of clay soil layer, etc. The County will conduct these studies, as needed, to estimate ponding duration within constructed basins. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s) as feasible.

The County will develop a Western Spadefoot Habitat Mitigation and Monitoring Plan to describe requirements for the constructed basins, how basin sites are chosen, what activities will be conducted during the installation of the new basins, adaptive management, maintenance activities, access controls (e.g., fences), and what monitoring and reporting activities will occur and when. The data for the micro-habitat hydrological analysis will also be presented within this plan. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to the CDFW and USFWS for review and comment.

The new basins will be constructed concurrently with the Alpine County Park, and western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint.

Monitoring of the newly constructed basins will be conducted during the wet season (approximately December through April) at approximately 1-week intervals beginning

with the first significant rain event each year for 5 years following completion of the basin construction. The County's biologist will map the spatial extent of the basins, document inundation depths of the basins and breeding outcomes, and determine if adaptive management is needed to increase survival and recruitment within the constructed basins. Notes will be made if egg masses or larvae are observed. One nocturnal adult survey will also be conducted in each of the 5 years when a breeding event is occurring to document the foraging/mobility patterns of western spadefoots near the new basins. The County will also monitor the core breeding population on the Wright's Field Preserve using the same methods described above (basin mapping and weekly checks, nocturnal survey, etc.) to document the population dynamics of the entire population over time.

Monitoring/survey data will be provided to CDFW and USFWS by the monitoring biologist following each monitoring period, and a written report summarizing the monitoring results will be provided to CDFW and USFWS at the end of the monitoring effort each year. Success criteria for the monitoring program shall include evidence of ponding duration suitable to support western spadefoot reproduction within at least one of the constructed basins in at least one of the 5 years of monitoring.

After exclusionary fencing has been installed around all initial ground-disturbing construction, but prior to initiation of initial ground disturbance, the spadefoot biologist will conduct at least three nighttime surveys for spadefoots within the fenced area. Surveys will continue until no more spadefoots are captured and relocated out of the fenced footprint and/or upon the recommendations of the spadefoot biologist. These surveys will be conducted during appropriate climatic conditions and during the appropriate hours (i.e., nighttime, during rain events in breeding season) to maximize the likelihood of encountering spadefoots. If climatic conditions are not highly suitable for spadefoot activity, spadefoot habitat in the project footprint will be watered to encourage aestivating toads to surface. All spadefoots found within the project area will be captured and translocated by the spadefoot biologist to the nearest suitable habitat outside of the work area. Upon completion of these surveys and prior to initiation of construction activities, the spadefoot biologist will report the capture and release locations of all spadefoots found and relocated during these surveys to CDFW and USFWS.

MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the Migratory Bird Treaty Act (MBTA). To mitigate for potentially significant impacts on sensitive nesting birds and raptors, the County DPR shall avoid ground-disturbing activities during the bird breeding season to keep the project in compliance with state and federal regulations regarding nesting birds (i.e., the federal MBTA and California FGC). The bird breeding season is defined as January 15 to September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15. If removal cannot be avoided during the bird and/or raptor nesting season, a nesting bird survey will be conducted no more than 72 hours prior to ground-disturbing activities by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities. Biologists will also survey for raptor nests up to 1,500 feet from proposed ground- or vegetation-disturbing activities. This is necessary to definitively ascertain whether raptors or other

migratory birds are actively nesting on the project site or in an area that could be indirectly affected by work activities (i.e., through noise or visual disturbances). Special attention will be paid to determining the presence of nesting grassland-endemic bird species, such as grasshopper sparrow, that may be nesting within dense grasses present within the proposed development footprint.

If any active nests are detected, the area will be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist will be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior because of human interaction. Buffers may be adjusted, based on the observations by the biological monitoring on the response of the nesting birds to human activity.

MM-BIO-6: Burrowing Owl Preconstruction Surveys. Prior to the initiation of project clearing, grading, grubbing, or other construction activities, pre-construction surveys for determining the presence of burrowing owl will be conducted, including surveys of suitable habitat within the project footprint and a 300-foot buffer, by a qualified biologist; no grading shall occur within 300 feet of an active burrowing owl burrow. The pre-construction surveys shall follow the take avoidance survey methods outlined in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). The first survey shall be conducted within 30 days of initial site disturbance, and the second survey shall occur within 24 hours of initial site disturbance.

Following the initial pre-grading survey, the project site will be monitored for new burrows each week until grading is complete. Subsequent pre-construction surveys will be required if lapses in the project occur exceeding 72 hours. If present in the project construction footprint or within 300 feet of the project site, coordination with CDFW and USFWS shall occur to establish measures to avoid potential impacts on burrowing owl. Such measures will be decided in coordination with the CDFW and USFWS and follow the “Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County” (Attachment A of the County’s Report Format and Content Requirements – Biological Resources).

Following the first pre-construction survey within 30 days of initial site disturbance, the qualified biologist will submit a Pre-Grading Survey Report to the County, CDFW, and USFWS within 14 days of the survey and include maps of the project site. If any burrowing owls are observed, the burrowing owl locations on aerial photos and in the format described in the mapping guidelines of the County’s Report Format and Content Requirements – Biological Resources will be included. A qualified biologist will attend the pre-construction meeting to inform construction personnel about the burrowing owl requirements.

MM-BIO-7: Support Pallid Bat. The County DPR shall work with a bat expert to design and install bat boxes to attract pallid bat prior to vegetation removal activities commencing on-site. These bat boxes shall be designed to accommodate both solitary individuals and

maternal roost sites. Bat box design shall reflect the best practices at the time of installation and be specific to larger bats like pallid bat with respect to roost chamber sizes, etc. The design and placement of bat boxes shall also consider how to best maintain proper roost temperature. When possible, the bat boxes shall be placed along the edges of the wooded areas on-site. The final design, numbers, and placement of bat boxes will be determined by the bat expert in consultation with County DPR personnel using the best practices known at the time.

Monitoring of the bat boxes shall be conducted quarterly for the first 2 years and twice-yearly during years 3 through 5 after installation. Any problems that are noted (e.g., mortality, predation) shall be addressed in consultation with the bat expert. Occupancy status, including species, numbers, etc., shall be documented to the extent possible without disturbing the occupants. If, after the first 2 years, a bat box remains unoccupied by any bat species, the County DPR and bat expert will discuss if the bat box needs to be repositioned on-site or redesigned. An annual report shall be prepared by the bat expert or designee to document the findings of the monitoring visits. The County will provide copies of this annual report to CDFW and include updates on the bat box monitoring on the site in the County's annual report for the MSCP.

MM-BIO-8: Bat Roost Avoidance. Because of the difficulty in detecting all potentially occurring roosting bats (e.g., the western red bat within the Engelmann oaks, pallid bats within rock crevices), no construction activities that could disturb maternal roost site will occur during the pupping season (typically April 1 through August 31). This measure specifically precludes high-frequency surveying as well as intensive noise-generating activities (e.g., jackhammering, etc.) within 200 feet of any Engelmann oaks or rock outcrops during the pupping season.

If construction activities must occur within this 200-foot avoidance buffer during the pupping season, the County will conduct definitive bat roost surveys to determine the presence or absence of maternal day-roost and/or night-roost locations within the 200-foot avoidance buffer that overlaps the construction footprint. The bat biologist(s) who conducts these surveys shall have the appropriate education, training, and experience. The bat roost survey methodology will be described in a Bat Roost Management, Monitoring, and Mitigation Plan, which will be prepared at least 30 days prior to the start of construction and provided to CDFW.

Bat roost survey methods may include mist netting and tracking individual bats using telemetry and/or additional acoustic surveys timed to determine if individual Engelmann oaks or rock outcrops within the 200-foot avoidance buffer are supporting bat roost sites. If any maternal roost sites within the 200-foot avoidance buffer are identified, an appropriate avoidance buffer shall be established around that roost site in accordance with the requirements established in the Bat Roost Management, Monitoring, and Mitigation Plan. Avoidance buffer distances will account for the ability of individual bat species to tolerate specific types of low- and high-frequency construction noise and other human disturbance associated with the project. No construction activities that could disrupt the roost site will be permitted within the established avoidance buffer.

Bat biologists will monitor construction activities occurring adjacent to the bat roost avoidance areas in accordance with the Bat Roost Management, Monitoring, and Mitigation Plan. Monitoring frequency and duration also will conform to the Bat Roost Management, Monitoring, and Mitigation Plan and be able to determine if the established bat roost avoidance buffers are large enough to prevent maternal roost site impacts, including, but not limited to, roost site abandonment. Avoidance buffers will be expanded if any stress or disturbance to the maternal roost site is observed during monitoring. In years 1, 3, and 5 following construction, the County will conduct bat surveys, including maternal bat roost surveys, within the areas originally surveyed prior to construction.

If the maternal bat roost sites previously observed prior and during construction are still observed during these monitoring surveys, no additional mitigation will be required. If any maternal roost sites observed prior to or during construction are no longer present (i.e., are not observed in any of the three post-construction surveys), the County will mitigate for the loss of the maternal roost site at a 2:1 ratio, using methods agreed upon in the Bat Roost Management, Monitoring, and Mitigation Plan. This may include planting additional Engelmann oaks within the proposed preserve if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species.

MM-BIO-9: Provide Compensatory Habitat-Based Mitigation. To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III sensitive habitats, the County will provide compensatory mitigation consistent with its Biological Mitigation Ordinance (BMO) to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within Alpine Park Preserve and/or within off-site location(s), as summarized below:

Mitigation Requirements

Tier[a]	Total Impacts	Mitigation Ratio	Mitigation Requirement	On-site Mitigation[b]	Off-site Mitigation
Tier I	14.86	2:1	29.73	17.48 acres of preservation plus 4.84 acres of restoration (see **MM-BIO-10**)	7.41 acres of restoration on Wright's Field Preserve (see **MM-BIO-10**)
Tier II	3.97	1.5:1	5.95	5.95	None
Tier III	3.57	1:1	3.57	None	3.57[2]

a. Tiers correspond to those described in the County's BMO and mitigation sites will meet the criteria for BRCA.
b. Habitat-based mitigation for permanent direct impacts on non-native grasslands will be satisfied through purchase of credits and/or land acquisition of a similar high-quality non-native grassland in an offsite location.

MM-BIO-10: Native Grassland Mitigation. Impacts on 14.86 acres of Valley needlegrass grassland will be mitigated at a 2:1 ratio through preservation of 10.60 acres of Valley needlegrass grassland and 6.88 acres of open Engelmann oak woodland on-site, in addition to 4.84 acres of restoration of non-native grassland to Valley needlegrass grassland within the County's parcel and 7.41 acres of restoration on Wright's Field Preserve. All restoration will be conducted in accordance with a Habitat Restoration and

Enhancement Plan (HREP) approved by the Wildlife Agencies (USFWS and CDFW). Success criteria established in that HREP will include meeting at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining similar cover and species composition of native forbs currently present within non-native grassland areas on-site. If restoration does not meet the restoration goals, the County will implement adaptive management measures to be approved by the Wildlife Agencies.

IV. Findings of Conformance

The project is a public project, determined to be essential by the County. Therefore, the project can be found to be exempt from the BMO, Section 86.503(a)(8), as determined by the following findings:

a) The project has been found to conform to the County General Plan, the MSCP Plan, and Subarea Plan.

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

The proposed project is consistent with several County General Plan goals, including:

- Maintenance of the County's Rural Character (GOAL LU-2): Encouraging conservation and enhancement of the unincorporated County's varied communities, rural setting, and character;
- Sustainability of the Natural Environment (GOAL COS-2): Sustaining ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development;
- Park and Recreational Facilities (GOAL COS-21): Ensuring park and recreational facilities enhance the quality of life and meet the diverse active and passive recreational needs of county residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated county; and
- Recreational Opportunities in Preserves (GOAL COS-23): Promoting the acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources.

The project is also consistent with the County General Plan "Rural Lands" regional category, with an Open Space-Conservation (OS-C) land use designation in the western portion and a Semi-Rural Residential (SR-2) land use designation in the eastern portion.

The proposed project is consistent with several Alpine Community Plan goals, including:

- Land Use General Goal 1: Encourage a balance of land uses that will conserve natural and manmade resources, retain Alpine's rural character, and accommodate people of diverse lifestyles, occupations, and interests;
- Open Space Goal 1: This goal calls for a system of open space that preserves the unique natural elements of the community, retains and extends areas in open space that are recognized as valuable for conservation of resources, supports open space uses that promote public health and safety, and provides open space areas, or areas that are inappropriate for urbanization or required as buffers for urban development, that harmonize with and help integrate conservation and recreation components, creating a well-balanced community of natural plant and animal habitat; and
- Recreation Goal 1: This goal encourages a balanced system of both natural and improved parks with recreational facilities and services that incorporate outstanding natural features for recreational opportunities, enrich the lives of Alpine residents, and meet the needs of the community.

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

The proposed project involves development of Alpine County Park, an active park with amenities such as multi-use turf areas, a baseball field, an all-wheel park, bike skills area, recreational courts (i.e., basketball, pickleball), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging areas and a corral, nature play area, community garden, a volunteer pad, picnic areas with shade structures and picnic tables, game table plaza, and multi-use trails; parking and a volunteer pad would also be provided.

Existing trails will be retained where appropriate and rehabilitated. Impacts on sensitive species and habitats will be avoided to the maximum extent practicable. As documented in the California Environmental Quality act (CEQA) document for the project, significant impacts will occur because of the project. Significant impacts will be mitigated to less than significant through implementation of mitigation measures **MM-BIO-1** through **MM-BIO-10** and **APM-BIO-1**.

c) Where the project encroaches into a wetland or floodplain, mitigation measures will be required, resulting in a net gain in wetland and/or riparian habitat.

The project will not encroach into a wetland or floodplain. No impacts on wetlands or floodplains will occur because of project implementation.

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

The project will not encroach into steep slopes.

e) No mature riparian woodland will be destroyed or reduced in size because of otherwise allowed encroachments.

The project will not destroy or reduce in size mature riparian woodland.

f) All Critical Populations of Sensitive Plant Species within the MSCP Subarea Plan (Attachment C of Document No. 0769999, on file with the Clerk of the Board); Rare, Narrow Endemic Animal Species within the MSCP Subarea Plan (Attachment D of Document No. 0769999, on file with the Clerk of the Board); Narrow, Endemic Plant Species within the MSCP Subarea Plan (Attachment E of Document No. 0769999, on file with the Clerk of the Board); 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.

A wintering burrowing owl was observed within the project Study Area. The County will preserve at a 1:1 or higher ratio suitable habitat for burrowing owl (**MM-BIO-9**, **MM-BIO-10**, and **APM-BIO-1**), in addition to pre-construction surveys (**MM-BIO-6**). Decumbent goldenbush will be mitigated at a 3:1 ratio through transplanting and/or seeds within preserved land (**MM-BIO-1**).

Multiple Species Conservation Program

The findings contained within this document are based on County records, staff field visits, and the Biological Resources Report for the Alpine Park Project, dated December 2022 and prepared by ICF.

1. Biological Resource Core Area Determination

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

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

The project area qualifies as a BRCA because it is located within the County's Pre-Approved Mitigation Area (PAMA) and includes BRCAs.

B. Report the factual determination as to whether the mitigation site qualifies as a BRCA.

The preserve is designated as a PAMA on the Wildlife Agencies' pre-approved mitigation map for the Metro-Lakeside-Jamul segment of the MSCP County Subarea Plan. According to Section 86.506 of the San Diego BMO (County 2010), if land is shown as pre-approved mitigation on a preapproved mitigation

map approved by the Wildlife Agencies, such as in the MSCP Subarea Plan, it is considered a BRCA. If mitigation occurs outside the preserve, it will occur at a site that meets the qualifications of the BRCA, per the BMO.

2. Biological Mitigation Ordinance Findings

Although the project is exempt from the BMO because it is a public project and determined to be essential by the County, the following discussion has been included to demonstrate MSCP conformance.

A. Project Design Criteria.

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

The project was designed to minimize impacts on sensitive habitat, including land determined to be a Biological Resource Core Area to the maximum extent practicable. Permanent impacts on Engelmann oak woodlands were reduced to a minimum during the County's redesign of the Concept Plan of the proposed project in 2020. The County would avoid all Engelmann oak woodlands, trees, and their associated canopy during construction. No wetland features or aquatic resources were found within the study area during any field surveys. Permanent impacts on sensitive natural communities would occur predominantly within Valley needlegrass grassland, disturbed flat-topped buckwheat stands, and non-native grasslands. Permanent direct impacts may occur on up to 22.4 acres of sensitive natural habitats, while approximately 70 acres (72 percent) of land within the County's parcels will be permanently protected. In addition, proposed impacts on sensitive vegetation communities will be mitigated at a tier equal to or greater than the affected vegetation community; mitigation land will meet the criteria of a Biological Resource Core Area consistent with the BMO to reduce significant impacts on sensitive vegetation communities.

No federally or state-listed endangered or threatened plant species were observed within the biological study area; eight sensitive plant species (California Rare Plant Rank [CRPR] and County) were observed and documented. The project was designed to avoid impacts on these sensitive plant species to the maximum extent practicable, although two species could be affected by the project, decumbent goldenbush and Palmer's grappling hook. Approximately 13,857 Palmer's grapplinghook individuals were observed during special-status plant surveys in 2019. Of the approximately 13,857 individuals, approximately 200 could be affected by the Project footprint, representing approximately 1 percent of the on-site population; the remainder would not be affected. Because of the small number of individuals affected, the relatively abundant number of individuals in the entirety of the study area, and the available habitat that would be protected in perpetuity in the preserve, impacts would not result in a regional decline in the species and therefore would be less than significant. In addition, approximately 110 individuals of decumbent goldenbush could be affected by the project; however, the County would implement **MM-BIO-1**, which would require salvaging on-site plants and replacing lost individuals at a minimum ratio of 3:1. Permanent impacts on Engelmann oak woodlands were reduced to a minimum during the County's

redesign of the Concept Plan of the proposed park in 2020. The County would avoid Engelmann oak woodlands, trees, and their associated canopy during construction to the extent feasible. There are no proposed impacts on critical populations of sensitive plant species within the MSCP Subarea Plan that are listed in Attachment C of the BMO. County will preserve at a 1:1 or higher ratio suitable habitat for burrowing owl (**MM-BIO-9**, **MM-BIO-10**, and **APM-BIO-1**), in addition to pre-construction surveys (**MM-BIO-6**), as there was a wintering burrowing owl observed in the Study Area. No impacts on narrow endemic plant species within the MSCP Subarea Plan that are listed in Attachment E of the BMO.

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

   The proposed project would be located adjacent to existing development on three sides and clustered to avoid impacts to the extent feasible.

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

   Project development on steep slopes would not occur.

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

   The proposed project's roads and trails will be designed to consider public safety and avoid impacts on sensitive environmental resources to the extent practicable.

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

   Conformance with the objectives of the County Subarea Plan is demonstrated by the findings below in the section titled Subarea Plan Findings.

Preserve Design Criteria (Attachment G)

Acknowledge the "no net loss" of wetlands standard that individual projects must meet to satisfy state and federal wetland goals, policies, and standards and implement applicable County ordinances regarding wetland mitigation.

- No wetland features or aquatic resources were found within the study area during any field surveys; therefore, no net loss of wetlands or other aquatic resources would occur.

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

   The preservation and management of the Alpine Park Preserve would preserve currently existing habitat types used by a variety of wildlife species.

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

   The preservation and management of the Alpine Park Preserve would preserve currently existing habitat types used by a variety of wildlife species. Within the preserved and managed lands, the following sensitive vegetation communities will be maintained in perpetuity: Diegan coastal sage scrub; Diegan coastal sage scrub, *Baccharis* dominated; flat-topped buckwheat; coastal sage-chaparral transition; southern mixed chaparral; Valley needlegrass grassland; non-native grassland; and open Engelmann oak woodland. Habitat-based mitigation for permanent direct impacts on sensitive habitats would be satisfied through a combination of on-site preservation for Tiers I, II, and III and purchase of credits and/or land acquisition. Mitigation shall be within a habitat tier equal to or greater than the impact site.

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

   The County designed the project to avoid impacts to the maximum extent practicable, and the County will preserve and manage the Alpine Park Preserve in perpetuity to support preserve assembly envisioned under the MSCP. The project design considered potential impacts from access, non-native predators, non-native species, illumination, drain water, urban runoff, and noise, and the design and associated mitigation measures were created to reduce edge effects and address potential impacts.

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

   The proposed project would be constructed at the eastern edge of an island of open space and adjacent to existing development on three sides and would be directly adjacent to a busy arterial road. The project was designed in such a manner to meet the goals of the project and avoid impacts on sensitive habitat types to the maximum extent practicable while also providing preservation of sensitive habitat in perpetuity. Within the preserved and managed lands, the following sensitive vegetation communities will be maintained in perpetuity: Diegan coastal sage scrub; Diegan coastal sage scrub, *Baccharis* dominated; flat-topped buckwheat; coastal sage-chaparral transition; southern mixed chaparral; Valley needlegrass grassland; non-native grassland; and open Engelmann oak woodland.

5. Minimize impacts on narrow endemic species and avoid impacts on core populations of narrow endemic species.

   No narrow endemic plants are present within the project site or would be affected. Breeding populations of narrow endemic animal species are not present within any portion of the project area for Alpine County Park or Alpine Park Preserve.

   The project would not reduce the likelihood of recovery of listed species. Although the project would result in impacts on occupied QCB habitat, impacts would be mitigated through implementation of **MM-BIO-3** and the associated HCP and Habitat Restoration and Enhancement Plan for the project. The Section 10 species permitting process would ensure no reduced likelihood of recovery of QCB.

6. Preserve the biological integrity of linkages between BRCAs.

   Short-term indirect impacts could occur on decumbent goldenbush, Palmer's grapplinghook, and Engelmann oak during construction activities because each of these sensitive species occur within 200 feet of the adjacent to areas where the proposed Alpine County Park would be built. This project has been designed to minimize impacts on the BRCA by keeping the development footprint as small as possible while still meeting the project purpose and need. Multi-use trails have been designed to be as narrow as possible while allowing for public access. Project-related impacts on habitat within the BRCA would be mitigated consistent with the BMO through the implementation of compensatory mitigation within Alpine Park Preserve and/or within off-site location(s) that meet the qualifications of a BRCA. The project would directly and permanently affect Valley needlegrass grassland, non-native grassland, and flat-topped buckwheat within a BRCA. The County redesigned the proposed project's equestrian staging area to avoid impacts on Engelmann oaks. No permanent buildings would be built within 100 feet of oaks, and the nearest building would be more than 200 feet away from the nearest Engelmann oak canopy. Fire fuel modification activities would occur within approximately 0.1 acre of Engelmann oak woodland. Approximately seven Engelmann oak tree canopies are located within the area where fire fuel management would occur. Four of these oaks are in the Zone B fire fuel reduction zone where canopy thinning of some oaks may be required, in coordination with a certified arborist, while three oaks are located directly west of South Grade Road in the 20-foot area where fire fuel management will be extended west from the existing fire fuel management along South Grade Road.

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

   The preservation and management of the approximately Alpine Park Preserve adjacent to the proposed project would contribute to the conservation goals for covered species and habitats, as detailed in Table 3-5 of the MSCP Plan.

Design Criteria for Linkages and Corridors (Attachment H)

For project sites in a regional linkage and/or supporting one or more local corridors, the following findings shall be required to protect the biological value of the resources: habitat linkages, as defined by the BMO, rather than just corridors, will be maintained.

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

   The development of the project would not interfere with connectivity or wildlife corridors. The conversion of 22.4acres of native habitat to a developed park facility would not constrain wildlife movement, because the park would be adjacent to existing development on three sides (north, south, and east) and would be directly adjacent to a busy arterial road, South Grade Road, that already limits wildlife movement in the area. A preserve (Alpine Park Preserve) would be created on the western edge of the park and maintained as an MSCP preserve in perpetuity. This preserve would be located directly adjacent to the existing 231-acre Wrights' Field Preserve, further enhancing protected preserve lands in this area.

   Existing trails on the County property may be utilized by medium and large mammals for ease of movement through the preserve. No features would be constructed that would impinge on any movement areas for these animals, and most existing trails in the area would remain open. No restrictions would be created on ridgelines or through canyons/depressional areas. Areas identified as "Native Habitat Avoidance Area" are within the generalized boundary of the proposed Alpine County Park, but they would not be subject to mass grading or vegetation removal during site preparation activities.

   The study area and the adjacent Wright's Field are surrounded by low-density exurban residential development. Therefore, the study area and Wright's Field currently function as an "island" of habitat with limited connectivity to open space and other preserve areas. The proposed project would be constructed at the eastern edge of this island of open space, leaving a smaller but similarly situated "island" of habitat to the west of the proposed project. As such, the project site would not be considered a wildlife corridor and would not disrupt habitat connectivity.

   Public access is proposed only during daylight hours and would not affect the nighttime movement of medium to large mammals. Implementation of the project would not constrain movement of reptiles, small mammals, or birds. The project would not create artificial wildlife corridors. The trails may be utilized by medium to large mammals but would not modify or constrain any corridors on the preserve.

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

   Although the study area is not considered a wildlife corridor, the County will preserve and manage the Alpine Park Preserve in perpetuity to support preserve assembly envisioned under the MSCP, including areas with good vegetative and/or topographic cover.

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

   The project is not located in a regional linkage. The preservation and management of the Alpine Park Preserve would preserve currently existing local movement areas used by a variety of wildlife species. In the proposed project, public access is proposed only during daylight hours and would not affect the nighttime movement of medium to large mammals.

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

   The preservation and management of the Alpine Park Preserve would preserve currently existing linkages used by a variety of wildlife species. In the proposed project, public access is proposed only during daylight hours and would not affect the nighttime movement of medium to large mammals. Implementation of the project would not constrain movement of reptiles, small mammals, or birds.

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

   The preservation and management of the Alpine Park Preserve would preserve currently existing local movement areas used by a variety of wildlife species.

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

   The project would not constrain the visual continuity of wildlife corridors or linkages. Development would be focused on the eastern edge of the existing open space adjacent to the busy South Grade Road. Trails would not interrupt visual continuity.

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

   The project does not propose any new nighttime lighting or nighttime usage of the preserve. Public access to the preserve would be limited to a low level and would not substantially increase noise within the preserve. Public access in the proposed project is proposed only during daylight hours and would not affect the nighttime movement of medium to large mammals. The preservation and management of the Alpine Park Preserve would preserve currently existing natural conditions.

8. Barriers, such as roads, will be minimized. Roads that cross corridors should have 10-foot-high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.

   No wildlife corridors are present within the project area. No new roads or barriers would be introduced. No roads and therefore no wildlife underpasses are included in the design for the proposed project.

9. Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will be used only when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition and vegetated with native vegetation, if possible; a line of sight to the other end will be provided; and, if necessary, low-level illumination will be installed in the tunnel.

   No wildlife underpasses or crossings are included in the design for the proposed project.

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

    The preservation and management of the Alpine Park Preserve would preserve currently existing dispersal habitat used by a variety of wildlife species.

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.

   No wetland features or aquatic resources were found within the study area. The project has been designed to avoid impacts on CDFW jurisdictional habitat.

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

   Structurally diverse habitats are present on-site. The project has incorporated design measures to conserve the habitats on-site. These measures include the use of existing trails, paths, and disturbed areas to the maximum extent practicable; prohibition of the use of motorized vehicles on trails; the use of natural vegetation, topography, limited fencing, and signage to direct trails users to designated trails and away from sensitive habitat areas; the requirement that dogs be leashed at all times; and trails being no greater than 4 feet wide.

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.

   Native Habitat Avoidance Areas are located within the northern end of the Alpine County Park adjacent to the proposed equestrian staging area and include open Engelmann oak woodland, flat-topped buckwheat, and disturbed flat-topped buckwheat. Native Habitat Avoidance Areas will not be subject to mass grading or vegetation removal during site preparation activities.

   The preserve is located within the PAMA of the County's MSCP Subarea Plan. The project has been designed to minimize impacts to the adjacent preserve, and as required under the County's MSCP Subarea Plan, the preserve will be managed in perpetuity in accordance with a Resource Management Plan. This plan will outline management activities to be carried out by the County—specifically, by County park rangers and on-site personnel who will live on-site. Activities likely to be included in the Resource Management Plan would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration on the preserve as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County will demonstrate its long-term commitment to species conservation within the preserve.

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

   The project has been designed to minimize direct and indirect impacts by concentrating Alpine County Park infrastructure adjacent to developed lands. The Alpine Park preserve will be situated immediately west and northwest of the Alpine County Park; the preserve is situated adjacent to the approximately 231-acre Wright's Field Preserve on its western border. As a result, the preserve, along with Wright's Field Preserve, forms a large block of habitat of approximately 300 acres with minimal edge effects. The design and configuration of the Alpine County Park maximizes the ratio of surface area to the perimeter of conserved lands.

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

   The proposed project has been designed to minimize or avoid impacts on sensitive habitat areas. No direct impacts will occur on any Engelmann oaks, Engelmann oak woodland (Tier I habitat), or Engelmann oak canopy from the proposed project. The project is not anticipated to cause indirect impacts at levels that would be likely to harm sensitive habitats over the long term. Though anthropogenic presence is likely to increase through construction of the Alpine County Park, measures have been sought to reduce impacts on the sensitive natural communities in the neighboring preserve. The current informal trail system will be converted to a more formalized system, discouraging unauthorized uses within the Alpine Park

Preserve. A permanent live-in park range volunteer will also be situated within the Alpine County Park, which will further reduce indirect impacts on sensitive habitats through an increased monitoring presence in the area.

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

   The proposed project has been designed to minimize or avoid impacts on habitat and special-status species. Native Habitat Avoidance Areas within Alpine County Park and the preserve will conserve native habitat that will provide for the conservation of multiple species and all five Tier I through Tier III habitats (i.e., Diegan coastal sage scrub, including *Baccharis* dominated; flat-topped buckwheat; Valley needlegrass grassland; non-native grassland; open Engelmann oak woodland) documented within the County's 96.6-acre parcel. Mitigation measures have been incorporated into the project, and mitigation for impacts on habitat will be consistent with the mitigation requirements of the BMO.

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

   The project area does not have suitable breeding habitat for golden eagle. A reduction in potential foraging habitat would not result in a substantial adverse effect on the long-term survival of this species. It is unknown if the site is occupied by mule deer or other large predators, such as mountain lion, because it is surrounded by development on at least three sides (north, south, west), with some exurban development on the south side. The configuration of the preserve adjacent to the Wright's Field Preserve would result in approximately 300 acres of preserved habitat that would connect to private conservation easements directly south of the preserve and Cleveland National Forest lands located approximately 0.25 mile south of the preserve. The project would not result in take of golden eagles. The project is situated within eagle foraging habitat, but the impacts associated with implementation of the project would not significantly affect eagle foraging and would not result in take. No project elements are proposed within 4,000 feet of a golden eagle nest.

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 generally call for no impact on critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.

   No rare, narrow endemic species and no critical populations of sensitive plant species were observed in the study area. There are no anticipated impacts on rare, narrow endemic animal species.

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

The proposed project will not affect the assembly of the County's MSCP preserve. Acquisition of the property for the creation of the Alpine County Preserve on the western edge of the proposed project was intended to contribute to the assembly of the preserve.

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

    The project has been designed to minimize edge effects through numerous iterations of the design and configuration of the proposed project, which has a clear, linear boundary on the western edge. In addition, edge effects will be reduced through establishment of the Alpine Park Preserve, which will be managed in perpetuity in accordance with a Resource Management Plan that will outline management activities to be carried out by County. Activities likely to be included in the Resource Management Plan would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration on the preserve as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat, and the County will demonstrate its long-term commitment to species conservation within the Alpine Park Preserve. Additional measures will be implemented, as necessary.

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

    This project has been designed to minimize impacts on the BRCA by keeping the development footprint as small as possible while still meeting the project purpose and need. Multi-use trails have been designed to be as narrow as possible while allowing for public access. Project-related impacts on habitat within the BRCA would be mitigated consistent with the BMO within Alpine Park Preserve and/or within off-site location(s) that meet the qualifications of a BRCA. The proposed project will affect 22.4 acres of native or naturalized habitat, including 14.86 acres of Tier 1 habitat (Valley needlegrass grassland, including disturbed Engelmann oak woodland), 3.97 acres of Tier II habitat (Diegan coastal sage scrub, including disturbed and *Baccharis* dominated; flat-topped buckwheat, including disturbed) and 3.57 acres of Tier III habitat (non-native grassland). Habitat-based mitigation for permanent direct impacts on sensitive habitats will be consistent with the BMO and satisfied through a combination of on-site preservation for Tiers I, II, and III and purchase of credits and/or land acquisition. Mitigation shall be within a habitat tier equal to or greater than the impact site, and the mitigation site shall meet the criteria of a BRCA.

    The project would result in the maintenance of 1.0 acre of existing multi-use trails throughout the property; maintenance of these use trails would not result in the removal of any native habitat.

    To reduce potential indirect impacts on sensitive biological habitats and species, including nesting birds, the design measures discussed below have been

incorporated into the project. A permanent live-in park volunteer will be situated within the Alpine County Park, which will reduce indirect impacts on sensitive habitats through an increased monitoring presence in the area. There will be no night lighting from the park, and construction of a formal trail system will keep visitors from venturing into the undisturbed native habitats within the Alpine Park Preserve. There will be no new nighttime lighting or nighttime usage of the preserve, and public access to the preserve would be limited to a low level and would not substantially increase noise within the preserve. The changes in hydrology expected from implementation of the septic system (i.e., increase in water use compared to baseline conditions) would occur within disturbed habitat that is currently regularly disced for fire prevention/fuel modification. As a result, an increase in the amount of water in these areas would not result in a significant impact on sensitive species because none currently occur in this disturbed area. Additional measures include utilizing existing trails, paths, and disturbed areas to the maximum extent practicable; prohibition of motorized vehicles on trails; the use of natural vegetation, topography, limited fencing, and signage to direct trails users to designated trails and away from sensitive habitat areas; and the requirement that dogs be leased as all times. In addition, trail grading and construction will be prohibited during the bird breeding season, defined as January 15 to September 15, unless it is determined through surveys that nesting birds are not present. If nesting birds are documented on-site, the area will be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist will be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. Water quality best management practices, including gravel bags, fiber rolls, and silt fencing, will be implemented throughout the project site during and after construction.

No feasible, less environmentally damaging alternative could be employed that would allow implementation of this essential public project.

Department of Parks and Recreation

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