

**MULTIPLE SPECIES CONSERVATION PROGRAM
FINDINGS OF CONFORMANCE FOR**

**RIVERFORD ROAD ROUNDABOUTS PROJECT
1023987**

October 25, 2024

I. Introduction

The proposed Riverford Road Roundabouts Project (project) is located within the State Route 67 (SR-67) and Riverford Road interchange, in the unincorporated community of Lakeside in San Diego County. The project involves construction of two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and realignment of SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. The proposed project is located within a portion of the El Cajon U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle, in the Lakeside Community Planning Area. The project is located within the County of San Diego (County) South County Multiple Species Conservation Program (MSCP), with a small portion in the northwestern area being mapped as Pre-Approved Mitigation Area (PAMA) and qualifying as a Biological Resources Core Area (BRCA), according to the six criteria of the County's Biological Mitigation Ordinance (BMO). Therefore, the project is required to conform to the MSCP, MSCP Subarea Plan, and the BMO.

A thorough discussion of project impacts and mitigation can be found in the project's associated Mitigated Negative Declaration and Initial Study Checklist, prepared in accordance with the California Environmental Quality Act. Significant impacts associated with the proposed project that are within the Unincorporated Land in Metro-Lakeside-Jamul Segment of the South County MSCP include:

- Potential impacts to habitat for federally threatened coastal California gnatcatcher (CAGN; *Polioptila californica californica*) and federally- and state-endangered least Bell's vireo (LBV; *Vireo bellii pusillus*).
- Permanent impacts to 0.04 acre of disturbed non-BRCA southern cottonwood-willow riparian forest and 1.54 acres (including disturbed) of Diegan coastal sage scrub (CSS) (1.47 acres of non-BRCA and 0.07 acre of BRCA).
- Temporary impacts to 0.04 acre of disturbed non-BRCA southern cottonwood-willow riparian forest and 0.12 acre of disturbed non-BRCA CSS.

Impacts to southern cottonwood-willow riparian forest and Diegan coastal sage scrub would require compensatory habitat-based mitigation in compliance with the BMO as follows:

Vegetation Community (County MSCP Tier Levels)	Temporary Impacts ¹ (acres)	Permanent Impact		
		Impacts (acres)	Mitigation Ratio ²	Mitigation ³ (acres)
Disturbed southern cottonwood-willow riparian forest (Tier I) [non-BRCA]	0.04	0.04	1:1	0.04
Subtotal Wetland/Riparian	0.04	0.04		0.04
Diegan coastal sage scrub (Tier II) [non-BRCA]	0.12	0.33	1:1	1.47
Disturbed Diegan coastal sage scrub (Tier II) [non-BRCA]	–	1.14		
Disturbed Diegan coastal sage scrub (Tier II) [BRCA]	–	0.07	1.5:1	0.11
Disturbed habitat (Tier IV)	0.70	5.94	n/a	–
Urban/ developed (no tier)	3.26	5.98	n/a	–
Subtotal Upland	4.08	13.46	–	1.58
TOTAL	4.12	13.50	–	1.62

NOTE: Numbers may not total due to rounding. Also, this table does not include impacts to habitat underneath Riverford Road bridge because although work may occur within the road/bridge, it would not affect the vegetation underneath the bridge.

¹All temporary impacts would be restored on-site with habitat of equal or greater value at a replacement ratio of 1:1.

²Mitigation ratios reflected here are for permanent impacts only, which are based on whether the impacted land is considered to be a biological core resource area (BRCA). Accordingly, the vegetation communities are presented as either BRCA or non-BRCA.

³Mitigation for permanent wetland and upland impacts would use existing or purchasing credits from a mitigation bank within the San Diego River watershed.

Measures to avoid and minimize impacts associated with the proposed project include:

California Coastal Gnatcatcher

AMM-1. According to the adopted MSCP, no clearing of occupied habitat may occur between March 1 – August 15. Although there is no occupied habitat within the PIA, as an avoidance measure all vegetation clearing/grubbing shall take place between August 16 – February 28, outside the CAGN nesting season. Outside of the breeding season, no biological monitoring shall be required. If vegetation removal occurs during the breeding season, pre-construction surveys and biological monitoring shall be required as noted below. If construction pauses for longer than seven days during the Migratory Bird Treaty Act (MBTA) nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

AMM-2. Prior to construction during the bird breeding season, a qualified biologist shall perform a minimum of three focused pre-construction surveys, on separate days, in and adjacent to suitable habitat for the species to determine the presence of CAGN within the PIA. Surveys shall begin a maximum of seven days prior to performing construction within 300 feet of suitable habitat during the breeding season, and one survey shall be conducted the day immediately prior to the initiation of construction within 300 feet of suitable habitat during the breeding season. If suitable habitat is not removed during the initial construction clearing/grading, additional surveys shall be conducted immediately prior to each habitat removal within 300 feet of suitable habitat. If pre-construction surveys are negative for CAGN within the PIA, no additional measures for this species shall be required and vegetation clearing/grading can proceed.

AMM-3. Any nighttime construction lighting (e.g., staging areas, equipment storage sites, active work areas) shall be selectively placed and directed toward the construction site. Lighting shall be limited to the lowest illumination necessary to allow for safe completion of work and directed away from, shielded, or pointed downward and away from the adjacent habitat of the river corridor (for least Bell's vireo habitat) and adjacent CSS (for CAGN habitat).

AMM-4. Permanent roadway lighting shall be installed to help illuminate both roundabouts for drivers' and pedestrians' safety. Roadway lighting facilities shall be consistent with the County's and Caltrans' illumination standards and design requirements.

AMM-5. Prior to initiation of construction activities, orange construction fencing, or equivalent high-visibility construction fencing, shall be installed along the limits of construction disturbance adjacent to sensitive biological resource areas. All construction (including access/staging areas) shall be restricted to developed areas or previously defined/approved work areas. Equipment staging, storage, and maintenance shall be located outside the active river channel, riparian, and CSS vegetation. Temporary fencing shall be removed at the completion of construction.

AMM-6. A qualified biologist shall monitor construction activities as needed to oversee avoidance of sensitive biological resources, with full-time monitoring during initial vegetation removal, grubbing, and grading. Monitoring biologist shall be familiar with the special status species known to be present or with potential to occur on project site that could occur within the vegetation communities proposed for removal. Should a special status species be encountered, biological monitor shall request that the Resident Engineer stop work in the area. Biological monitor shall determine the next steps required (e.g., implement avoidance measures, contact Caltrans, the County, or wildlife resource agencies), and shall work with the RE to identify areas where work can proceed while measures are determined.

AMM-7. An employee education program shall be developed and implemented by a qualified biologist prior to construction. Each construction employee (including temporary, contractors, and subcontractors) shall receive a training/awareness program prior to working on the proposed project. Employees shall be advised of listed species in the project's vicinity and the potential penalties for taking of such species. At a minimum, the program shall include: occurrence of the listed and sensitive species in the area (including photographs), their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of federal and State laws, reporting requirements, and project-specific mitigation and avoidance & minimization measures designed to reduce impacts to these species. Employee education program shall also cover project permit requirements, if applicable, and communication protocol with the public agency constructing the project and with wildlife resource agencies, if applicable.

AMM-8. The following general construction BMPs shall be employed to minimize impacts to sensitive biological resources from construction activities:

- Erosion and sediment control measures (e.g., straw wattles, gravel bags, silt fencing) shall be in place and in functional condition throughout all phases of the project where

sediment run-on or run-off from exposed slopes threatens to enter the river or aquatic habitats. Jute for straw wattles must be made of natural material.

- Monitoring biologist shall check the project site immediately prior to and periodically during construction, to identify presence of invasive weeds and recommend measures to avoid their inadvertent spread resulting from construction activities. Measures may include inspection and cleaning of construction equipment and use of eradication strategies. Special care shall be taken during transport, use, and disposal of soils containing invasive weed seeds, and all weedy vegetation removed during construction shall be properly stored and disposed of to prevent spread into areas outside of the construction area.
- All heavy equipment shall be washed and cleaned of debris, sediment, and foreign matter prior to entering the project area to minimize the spread of invasive weeds.
- All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall be restricted to designated areas located outside of marked (e.g., flagged/staked) wetlands or waters. Spill prevention materials or equipment, such as drip pans and spill kits, shall be maintained on-site to contain any spill or inadvertent release of materials that may cause pollution or nuisance if such materials reach Waters of the United States (WOTUS)/Waters of the State (WOTS).
- All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and the edges covered with soils and plastic sheeting such that small wildlife cannot access them.
- Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access.
- Exposed trenches, holes, and excavations shall be inspected daily (i.e., at the end of the workday, before sealing the exposed area) either by the Resident Engineer, construction inspector, superintendent or project foreman to check for wildlife entrapment. Excavated areas shall provide an earthen ramp to allow for a wildlife escape route.
- All waste, including pet waste, shall be removed from the project area. All food-related trash shall be enclosed in sealed wildlife-proof containers and removed from the site daily. All construction related debris, excess materials, and building materials shall be removed regularly from the project site for disposal at an authorized landfill or other disposal site, in compliance with federal, state, and local laws and regulations.
- Project personnel shall be prohibited from bringing domestic pets to construction sites to ensure pets do not disturb or deplete wildlife in adjacent native habitats.

Least Bell's Vireo

AMM-9. According to the adopted MSCP, no clearing of occupied habitat may occur between March 15 – September 15. Although there is no occupied habitat within the PIA, as an avoidance measure all vegetation clearing/grubbing shall occur between September 16 – March 14, outside the LBV nesting season. Outside of the breeding season, no biological monitoring shall be required. If vegetation removal occurs during the breeding season, pre-construction surveys and biological monitoring shall be required. If construction pauses for longer than seven days during the MBTA nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

AMM-10. Prior to construction during the bird breeding season, a qualified biologist shall perform a minimum of three focused pre-construction surveys, on separate days, in and adjacent to suitable habitat for the species, to determine the presence of LBV within the PIA. Surveys shall begin a maximum of seven days prior to performing construction within 300 feet of suitable habitat during the breeding season, and one survey shall be conducted the day immediately prior to the initiation of construction within 300 feet of suitable habitat during the breeding season. If the suitable habitat is not removed during the initial construction clearing/grading, additional surveys shall be conducted immediately prior to each habitat removal within 300 feet of suitable habitat. If pre-construction surveys are negative for LBV within the PIA, no additional measures for this species shall be required and vegetation clearing/grading can proceed.

AMM-11. To ensure noise levels during construction are in compliance with the USFWS' guidance of 65 A-weighted decibels (dBA) and do not affect LBV use areas, all rock removal activities at the northern and southern roundabouts that may involve the use of a hydraulic splitter, pneumatic hammer, or any other noise-producing rock removal equipment or methods shall not occur simultaneously with any other general construction activities north of the defined Environmentally Sensitive Area line, as identified the Natural Environment Report for Riverford Road and State Route 67 (Figure 6; September 2024) for all stages of construction.

Other Special Status / Migratory Birds

AMM-12. All vegetation clearing/grubbing shall take place between September 16 – January 14, outside of the combined avian nesting season. If vegetation removal needs to occur during the breeding season, pre-construction surveys and monitoring shall be required. If construction pauses for longer than seven days during the Migratory Bird Treaty Act (MBTA) nesting bird period, a repeat of the bird nesting survey shall occur before construction can restart.

AMM-13. During the bird breeding season, a qualified biologist shall perform focused pre-construction surveys in and adjacent to suitable habitat for the species to determine the presence of active nests within the PIA. Survey shall be conducted a maximum of seven days prior to performing construction within 300 feet of suitable habitat during the breeding season. If the suitable habitat is not removed during the initial clearing/grading construction

effort, additional surveys shall be conducted immediately prior to each habitat removal during project construction within 300 feet of suitable habitat. If pre-construction surveys are negative for active nests within the PIA, no additional measures shall be required.

Bats

AMM-14. A biologist with expertise and experience with bats shall be retained as a designated bat biologist. The designated bat biologist shall have at least 3 years of experience in conducting bat habitat assessments, day roosting surveys, and acoustic monitoring, and have adequate experience identifying local bat species (visual and acoustic identification), type of habitat, and differences in roosting behavior and types (i.e., day, night, maternity). In order to avoid direct impacts to any potentially tree-roosting bats, the designated bat biologist shall survey any trees with potential to support this species that are proposed for trimming or removal immediately prior to the activities; if bats are present, biologist shall be present during all vegetation removal and tree trimming at the occupied habitat and examine the branches for nonvolant (nonflying) juvenile bats prior to disposal.

AMM-15. During construction, the removal of trees or their branches shall be avoided to the maximum extent practicable within or adjacent to occupied bat habitat, if found. If tree removal or trimming is necessary for project construction, this activity shall be performed outside the bat maternity season (May through August 31) to avoid impact to flightless young. If any trees are occupied by tree-roosting bats, additional avoidance/mitigation measures shall be implemented as recommended by the biological monitor. Any injured or potentially injured bats shall be transported by the designated bat biologist to a CDFW-licensed bat rehabilitator within 24 hours. With the implementation of these measures, the project is expected to avoid significant direct impacts to the western red bat and western yellow bat, if present.

Crotch's Bumble Bee

AMM-16. Prior to vegetation clearing for construction, a Crotch's bumble bee habitat assessment shall be conducted by a qualified biologist during the spring when nectar plants are at peak bloom, in accordance with the most current survey guidance developed by CDFW (2023). Prior to the habitat assessment, the baseline data and recent aerial photographs shall be reviewed to identify locations with the highest potential to support Crotch's bumble bee. During the habitat assessment, the survey area shall be traversed, and potential nectar sources mapped based on the location and abundance of blooming plants. In accordance with CDFW's survey guidance, habitat quality shall be characterized and classified based on criteria which includes but is not limited to: the presence and abundance of nectar plants and physical characteristics of the habitat (slope and vegetation density), out-of-season nectar sources, nesting resources (e.g., abandoned burrows), quality of overwintering habitat and other factors. Criteria used to categorize low, moderate, and high nectar abundance within the survey area shall include the presence of potential nesting resources (e.g., small mammal burrows, flowering plants, and openings within scrub and grassland habitats).

AMM-17. If species or nectar sources are observed/mapped during the habitat assessment prior to vegetation clearing for construction, a focused survey shall be conducted by a qualified biologist during the Crotch's bumble bee flight season (April through August) prior to any vegetation clearing or grading based on the location of nectar sources mapped during the habitat assessment. The survey would be repeated during each subsequent flight season, should additional vegetation removal be required following the initial clearing prior to construction commencement. The survey shall be conducted in accordance with the current CDFW guidelines in effect at the time of the survey, which currently requires three surveys conducted between April and August, spaced at least two weeks apart. Surveys will also be conducted in accordance with CDFW guidelines' requirements regarding surveys frequency (e.g., repeat the survey during each subsequent flight season, should additional vegetation removal be required following the initial clearing prior to construction commencement). Per the guidance, any non-lethal capture and handling of bees shall require a Memorandum of Understanding (MOU) 2081(a) from CDFW. If non-capture methods are employed for Crotch's bumble bee detections, such as taking photographs for an identification voucher, these shall be verified by a taxonomic expert.

AMM-18. If Crotch's bumble bee is not detected, no further action shall be required. A report of the negative survey shall be submitted to the County and CDFW. If any Crotch's bumble bees are detected outside of the flight season referenced in AMM-16, a qualified biologist shall notify CDFW and the County and shall attempt to identify any nest locations. CDFW shall be consulted to determine if project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to construction (i.e., project activities). ITP conditions shall be fulfilled prior to initiating project activities. Take of any endangered, threatened, candidate species as a result of project construction is prohibited, except as authorized by State law under the California Endangered Species Act.

Robinson's Peppergrass

AMM-19. A focused rare plant survey shall be conducted in the spring prior to the start of construction to confirm presence and extent of on-site populations of any special status plant species.

AMM-20. If observed within the PIA, prior to initiation of construction activities, a qualified biologist shall flag or fence special status plant species that occur within the temporary impact areas, as confirmed during the focused rare plant survey. Special status plant species shall be avoided to the maximum extent feasible within the temporary impact areas. AMM-21. Any special status plant species that cannot be avoided within temporary impact areas shall be salvaged for transplant or included in the seed or plant palette for revegetation. If project timing allows, seed should be collected from individuals within the PIA prior to the start of construction.

AMM-22. If species are found onsite during the pre-construction focused plant surveys and would be impacted by the project, then mitigation shall be required and could be accomplished through inclusion of this species in on-site restoration of the temporarily

impacted CSS areas. All available Robinson's peppergrass seed from within the temporary impact areas of the PIA shall be collected prior to project impact, to be used on-site as part of the restoration plant palette. Additional seed from within the project vicinity shall be collected, if needed, and shall be no more than 5 percent of the total available seed.

Findings

The findings within this document are based on County records, staff site visits and the project's associated *Natural Environment Study for Riverford Road and State Route 67*, prepared by RECON Environmental, Inc., dated September 2024. The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's MSCP Subarea Plan, the BMO, and the Implementation Agreement between the County, the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The Project Impact Area (PIA) and the mitigation site shall be evaluated to determine if either or both sites qualify as a 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 BMO provides six criteria to identify if impacted habitat qualifies as a BRCA:

i. The land is shown as PAMA on the wildlife agencies' PAMA map, (Attachment F of Document No. 0769999 on file with the Clerk of the Board);

A small portion of the PIA is identified as a PAMA (approximately 0.38 acre) as shown in Attachment F of the BMO. Of this 0.38-acre area, most has been developed with roadways, such as North Woodside Avenue and Riverford Road (0.31 acre). However, a small portion of the 0.38-acre PAMA contains disturbed CSS (approximately 0.07 acre). Therefore, this 0.07-acre portion meets this criterion.

ii. The land is located within an area of habitat which contains biological resources that support or contribute to the long-term survival of Sensitive Species, which determination is based upon a biological analysis approved by the Director, and is adjacent or contiguous to preserved habitat that is within the PAMA on the

wildlife agencies' PAMA map (Attachment F of Document No. 0769999 on file with the Clerk of the Board);

The proposed project site consists of an existing freeway interchange. The 0.07-acre PAMA does not contain preserved habitat and is located in a median confined by North Woodside Avenue and SR-67 southbound on-ramp. As such, the project does not support habitat contiguous with the identified PAMA. Other CSS located south (offsite) supports breeding pairs of CAGN, and riparian habitat located north (offsite) supports pairs of LBV; however, none of these are located within the PIA. Therefore, the PIA does not meet this criterion.

- iii. The land is part of a regional linkage/corridor. A regional linkage/corridor is either:**
- a. Land which contains topography which serves to allow for the movement of all sizes of wildlife and is used by wildlife, including large animals on a regional scale; and contains adequate vegetation cover providing visual continuity so as to encourages the use of the corridor by wildlife; or**
 - b. It has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher, MSCP Resource Document Volume II, Appendix A-7 (Attachment I on file with the Clerk of the Board as Document No. 0769999).**

The PIA is not located within the San Diego River, which is considered a linkage/corridor. Therefore, the PIA does not meet this criterion.

- iv. The land is shown on the Habitat Evaluation Map (Attachment J of Document No. 0769999 on file with the Clerk of the Board) as Very High or High and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as Biological Resource Core Area;**

A small portion of the PIA (0.49 acre) is mapped on the Habitat Evaluation Model as Very High; however, approximately two-thirds of this area is within the developed areas of North Woodside Avenue and the Riverford Road bridge; therefore, impacts to this area would not affect high quality habitat. In addition, the PIA is located outside of the San Diego River and thus does not link significant blocks of habitat. Therefore, the habitat does not meet this criterion.

- v. The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of Sensitive Species;**

The habitat within the PIA is not part of a block of habitat greater than 500 acres of diverse and undisturbed habitat and, therefore, it does not meet this criterion.

- vi. **The land contains a high number of Sensitive Species and is adjacent or contiguous to surrounding undisturbed habitats, or contains soil derived from the following geologic formations which are known to support Sensitive Species: a) gabbroic rock; b) metavolcanic rock; c) clay; or d) coastal sandstone.**

CAGN and LBV were sighted within the project survey area, along with other sensitive wildlife and plant species; however, none were found within the PIA. The project site is mapped as having sandy and sandy loam soils and the site does not support geological formations (a) through (d) noted in the question. In addition, the site is surrounded by development and a significant amount of transportation infrastructure (i.e., SR-67 and related ramps, Riverford Road, Woodside Avenue, North Woodside Avenue, and Park & Ride lot). Therefore, the habitat within the project site does not meet this criterion.

Based on the project's biological analysis, only a small portion of the PIA meets the BRCA criteria and as such, approximately 0.07 acre of disturbed CSS would be considered BRCA.

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

Mitigation for the project's permanent impacts to riparian and CSS vegetation within the South County MSCP would consist of either enhancement, restoration, and/or creation of habitat; deduction of credits from a pre-approved mitigation area that qualifies as a BRCA; or other off-site mitigation bank credits or preservation. All approved mitigation banks are considered BRCA, as defined by Article VI.A.1.b.i of the BMO. Any temporarily impacted areas would be revegetated and restored onsite to pre-existing conditions.

III. Biological Mitigation Ordinance Findings

The proposed project would comply with the BMO.

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H, if applicable, must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or impacts within a BRCA, as discussed in these findings.

The proposed project would not adversely affect Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants.

The proposed project would impact approximately 0.07 acre of land located within a BRCA.

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

The proposed project has been designed to minimize impacts to sensitive habitats and sensitive species. The proposed project site consists, largely, of an existing highway interchange (e.g., roadways, highway ramps). The project's primary goal is to improve traffic efficiency within the SR-67/Riverford Road interchange. The project would also enhance pedestrian access by constructing shared-use pathways, sidewalks, crosswalks, and Class II bicycle lanes around the interchange. The project would also install two bioretention basins. As a result, minor permanent impacts to surrounding habitat are necessary to construct proposed improvements but would be the minimum required to fit the project components. These impacts include removal of disturbed southern cottonwood-willow riparian forest (0.04 acre, BMO Tier I) and Diegan coastal sage scrub (1.54 acres, BMO Tier II). However, the majority of the project's permanent impacts includes urban/developed lands (5.98 acres). The remaining impacts would occur to BMO Tier IV habitat, including disturbed habitat (5.94 acres). Therefore, the project meets the County's criterion to minimize impacts to habitat.

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

The project proposes improvements within the footprint of existing public transportation and pedestrian facilities within the County's and California Department of Transportation's (Caltrans) right-of-way. No new roadways or developments are proposed and, therefore, clustering of facilities is not applicable. Project impacts would be avoided and minimized to the maximum extent practicable.

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

The project proposes transportation and pedestrian facility improvements to existing intersections within the SR-67 interchange. The project would marginally encroach into steep slopes adjacent to developed roadways; however, the project has been designed to avoid and minimize impacts to the maximum extent feasible. The proposed engineering design includes installation of multiple retaining walls of varying sizes and slope stabilization methods under the two existing overpass bridges via pavement or installation of rock in mortar bed. The retaining walls would stabilize proposed cut slopes thereby preventing further grading or removal of habitat that would have otherwise been needed. Under-overpass slopes stabilization would not require removal of vegetation because no vegetation is present due to sandy and compacted soil within these slopes. Therefore, the project meets the County's criterion of encroaching onto steep slopes by including engineering design solutions that would assist in avoiding further impacts to habitat.

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

The project includes improvements to existing County- and Caltrans-maintained public transportation and pedestrian facilities. The main goal of the project is to improve traffic efficiency within the SR-67/Riverford Road interchange. The project would also enhance pedestrian access by constructing shared-use pathways, sidewalks, crosswalks, and Class II bicycle lanes around the interchange. Road standards and roadway safety would be maintained by complying with the County's and Caltrans' design standards for roundabouts, roadways, and pedestrian facilities. Project impacts would be minimized to the maximum extent practicable while maintaining the objectives of the project.

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

Compliance with applicable design criteria, including Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors), is described below in Sections B and C, respectively.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. Acknowledge the "no net loss" of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.

The proposed project would not encroach onto wetlands, as defined by the State or U.S. Army Corps of Engineers. Therefore, no wetland mitigation is required and the project would comply with state and federal wetland goals and policies.

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

The proposed project consists of improvements to and within existing public transportation and pedestrian facilities. Impacts to BRCA and non-BRCA CSS (including disturbed) and disturbed non-BRCA southern cottonwood-willow riparian forest, occurring adjacent to existing roadways and highway ramps, would be minimized. Mitigation for these impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved

mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. Mitigation would contribute to the structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

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

The proposed project would permanently impact 0.04 acre of disturbed southern cottonwood-willow riparian forest and 1.54 acres of CSS (including disturbed), both located within the project site and adjacent to existing roadways and highway ramps within the South County MSCP. Mitigation for these impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA.

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

The main goal of the project is to improve traffic circulation within the SR-67/Riverford Road interchange. The proposed project would also enhance pedestrian access by constructing shared-use pathways, sidewalks, and Class II bicycle lanes around the interchange, and install water quality treatment features. Sensitive habitat located within the South County MSCP would be permanently and temporarily impacted consisting of CSS and southern cottonwood-willow riparian forest. All temporarily impacted areas would be revegetated on-site at a 1:1 ratio restored to pre-construction conditions. Native vegetation would be used to revegetate any cut and fill areas. Mitigation for permanent impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. All mitigation would be consistent with the BMO. Therefore, the project meets the County's criterion to create significant blocks of habitat to reduce long-term edge effects.

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

The proposed project has been designed to minimize impacts to sensitive habitats and sensitive species. The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct

retaining walls and streetlights, and stabilize slopes. As a result, minor permanent impacts to surrounding habitat is necessary to construct the improvements. These impacts include removal of disturbed southern cottonwood-willow riparian forest (0.04 acre, BMO Tier I) and disturbed and non-disturbed BRCA and non-BRCA CSS (1.54 acres, BMO Tier II). However, the majority of the project's permanent impacts are to urban/developed lands (5.98 acres). The remaining impacts would occur to BMP Tier IV habitat, which is disturbed habitat (5.94 acres). All impacts would occur adjacent to existing roadways and highway ramps. Mitigation for impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO. Therefore, the project provides for the development of the least sensitive habitats and would mitigate appropriately for any project impacts.

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

The proposed project would not impact critical populations of sensitive plant species, significant populations of narrow endemic animal species, or narrow endemic plant species because none were identified within the PIA.

7. Preserve the biological integrity of linkages between BRCAs.

A small portion of the proposed project site qualifies as a BRCA (0.07 acre), but the project is not located within a designated BRCA and is not part of a regional linkage between multiple BRCAs. The project proposes to improve existing transportation and pedestrian facilities, and impacts would occur adjacent to existing roadways and highway ramps. Temporary project impacts would occur to the existing pavement of the Riverford Road bridge that crosses San Diego River and which represents a local habitat linkage; however, improvements would be confined to the width of the road at the top of the bridge and would not impact San Diego River underneath it. Therefore, the project meets the County's criterion as it would not jeopardize the long-term biological integrity of a linkage between BRCA.

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

Two covered avian species – CAGN and LBV – are known to occur outside of the PIA. Four LBV use areas and two CAGN use areas are located nearby but outside of the PIA. Approximately 1.54 acres of CSS and 0.04 acre of LBV habitat would be permanently impacted by the proposed project. However, as the goals of the project are to improve traffic efficiency and improve pedestrian facilities, impacts would occur adjacent to existing roadways and highway ramps. Mitigation for permanent impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO.

Therefore, the proposed project would not conflict with the MSCP's conservation goals for the covered CAGN and LBV species.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

Habitat linkages as defined by the BMO, rather than just corridors, would be maintained.

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

The only existing movement corridor within the survey area is the San Diego River, which represents a local habitat linkage. No impacts associated with the proposed project would occur to the San Diego River. While one of the temporary impacts is within a road traversing atop of an existing bridge that crosses San Diego River, improvements would be confined to the existing road width and no impacts to habitat or the river underneath the bridge would occur. Therefore, the project meets the County's criterion to identify and maintain existing movement corridors within linkages.

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

The only existing movement corridor within the survey area is the San Diego River, which represents a local habitat linkage. No impacts associated with the proposed project would occur to the San Diego River. While one of the temporary impacts is to the road traversing atop of an existing bridge that crosses San Diego River, improvements would be confined to the existing road width on the bridge and not underneath it. Therefore, the project meets the County's criterion to protect corridors 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 proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. Therefore, the project meets the County's criterion of maintaining regional linkages for wildlife travel.

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 proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. Therefore, the project meets the County's criterion of maintaining long-term habitat linkages of adequate width.

- 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 of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

The proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. Therefore, the project meets the County's criterion of maintaining existing wildlife movement corridors.

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

The proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. Therefore, the project meets the County's criterion of maintaining existing visual continuity of wildlife movement corridors.

- 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 proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. New streetlights would be installed around both roundabouts to help illuminate the road for drivers' and pedestrians' safety. As with all standard streetlights, they would point downward and use low illumination, consistent with standard streetlights. Also, no streetlights would be installed on top of the Riverford Road bridge that spans the San Diego River and, therefore, the project meets the County's criterion of maintaining limited artificial lighting. Any nighttime construction lighting would be selectively placed, directed toward the construction site, and limited to the lowest illumination necessary to allow for safe completion of work. Construction lighting would be directed away from, shielded, or pointed downward and away from the adjacent habitat of the river corridor and adjacent CSS habitat. Therefore, the project meets the County's criterion of maintaining limited artificial lighting.

For long-term operation of the roundabouts and associated infrastructure, the proposed project would not introduce new sources of noise. For construction, ambient noise level measurements and construction equipment noise modeling was performed at CAGN and LBV use areas located nearby but outside of the PIA. No construction-related noise impacts would occur to either CAGN or LBV use areas. Therefore, the project meets the County's criterion of maintaining low noise levels.

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

The proposed project includes improvements to existing public transportation and pedestrian facilities within the County's and Caltrans' right-of-way and would maintain all habitat linkages as they currently exist. Under the existing conditions, Riverford Road traverses via a bridge over San Diego River, which represents a local habitat linkage. While the project would have temporary impacts to repave Riverford Road (on top of the bridge) where it crosses San Diego River, construction would be confined to the existing roadway width and no impacts to San Diego River underneath the bridge would occur. Therefore, because no alterations are proposed to this segment of Riverford Road, the project meets this criterion of minimizing barriers such as roads.

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

The proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. No alterations to the existing Riverford Road bridge traversing San Diego River (a local habitat linkage) would occur. All temporary construction impacts would be restricted to the top of the bridge's roadway limits. Therefore, the project meets the County's criterion of maintaining and preserving an existing bridge with a wildlife crossing underneath it and no new tunnels or box culverts are proposed.

- 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 1-2 miles.**

The proposed project includes improvements to existing roadways and intersections and would maintain all habitat linkages as they currently exist. No alterations to the roadway traversing San Diego River (which is a local habitat linkage) would occur.

IV. Subarea Plan Findings

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

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

The proposed project would not encroach on wetlands as defined by the State or U.S. Army Corps of Engineers. Therefore, no wetland mitigation would be required, and the project would comply with State and federal goals and policies associated with wetlands.

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

The proposed project consists of improvements around existing public transportation and pedestrian facilities. Permanent impacts to BRCA and non-BRCA CSS (including disturbed) and disturbed non-BRCA southern cottonwood-willow riparian forest, occurring adjacent to existing roadways and highway ramps, would be minimized. Mitigation for these impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. Mitigation would contribute to the structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

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.

Minor permanent impacts to CSS and riparian habitat is necessary in order to construct the proposed project. These impacts include removal of disturbed southern cottonwood-willow riparian forest (0.04 acre, BMO Tier I) and disturbed and non-disturbed BRCA and non-BRCA CSS (1.54 acres, BMO Tier II). However, the majority of the project's permanent impacts consist of urban/developed lands (5.98 acres). Remaining impacts would occur to BMO Tier IV habitat, which is disturbed habitat (5.94 acres). Mitigation for impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO. Therefore, through mitigation, the project meets the County's criterion of providing for or maintain existing conservation of spatially representative high and very high value habitats in the long-term.

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

Mitigation for permanent impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. All mitigation would be consistent with the BMO. Therefore, through mitigation, the project meets the

County's criterion of creating or preserving existing significant blocks of habitat to reduce long-term edge effects.

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

The proposed project involves constructing two roundabouts, shared-use pathways and sidewalks for pedestrians and bicyclists, Class II bicycle lanes, crosswalks, and new SR-67 on- and off-ramp legs. The project would also add water quality improvement features and stormwater drainage components, construct retaining walls and streetlights, and stabilize slopes. As a result, minor permanent impacts to surrounding habitat is necessary to construct the proposed improvements. These impacts include removal of disturbed southern cottonwood-willow riparian forest (0.04 acre, BMO Tier I) and disturbed and non-disturbed BRCA and non-BRCA CSS (1.54 acres, BMO Tier II). However, the majority of the project's permanent impacts consist of urban/developed lands (5.98 acres). The remaining impacts would occur to BMO Tier IV habitat, which is disturbed habitat (5.94 acres). All impacts are to habitat adjacent to existing roadways and highway ramps. Mitigation for impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO. Therefore, the project provides for the development of the least sensitive habitats.

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

The proposed project would only impact vegetation communities that are adjacent to the existing roadways and highway ramps. Two MSCP-covered sensitive avian species – CAGN (federally-listed threatened) and LBV (federally- and State-listed endangered) – are known to occur outside of the PIA; however, the site is not believed to or known to support key regional populations of these species. In accordance with the BMO, habitat-based compensatory mitigation would occur for permanent impacts, which would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. Therefore, the proposed project would ensure conservation of key regional populations of covered species.

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.

Mitigation for permanent impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA. Through this mitigation, the project would contribute to the conservation of large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species. Further, the

project site is not located adjacent to any known golden eagle nest sites or within known eagle foraging areas. Therefore, the project would not interfere with conservation of interconnecting blocks of habitat that contribute to preservation of said species noted in the question.

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

No critical or narrow endemic species were detected onsite during biological surveys. Therefore, the proposed project would not adversely affect critical populations and narrow endemics as none were identified within the PIA.

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

The proposed project includes improvements to existing public transportation and pedestrian facilities within the SR-67 interchange. Project impacts would be minimized to the extent practicable and would occur, largely, adjacent to existing roadways and highway ramps. Therefore, the project would not jeopardize the assembly of a preserve within the South County MSCP Subarea Plan.

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

The proposed project consists of improvements to public transportation and pedestrian facilities maintained by the County and Caltrans. Mitigation for impacts would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO.

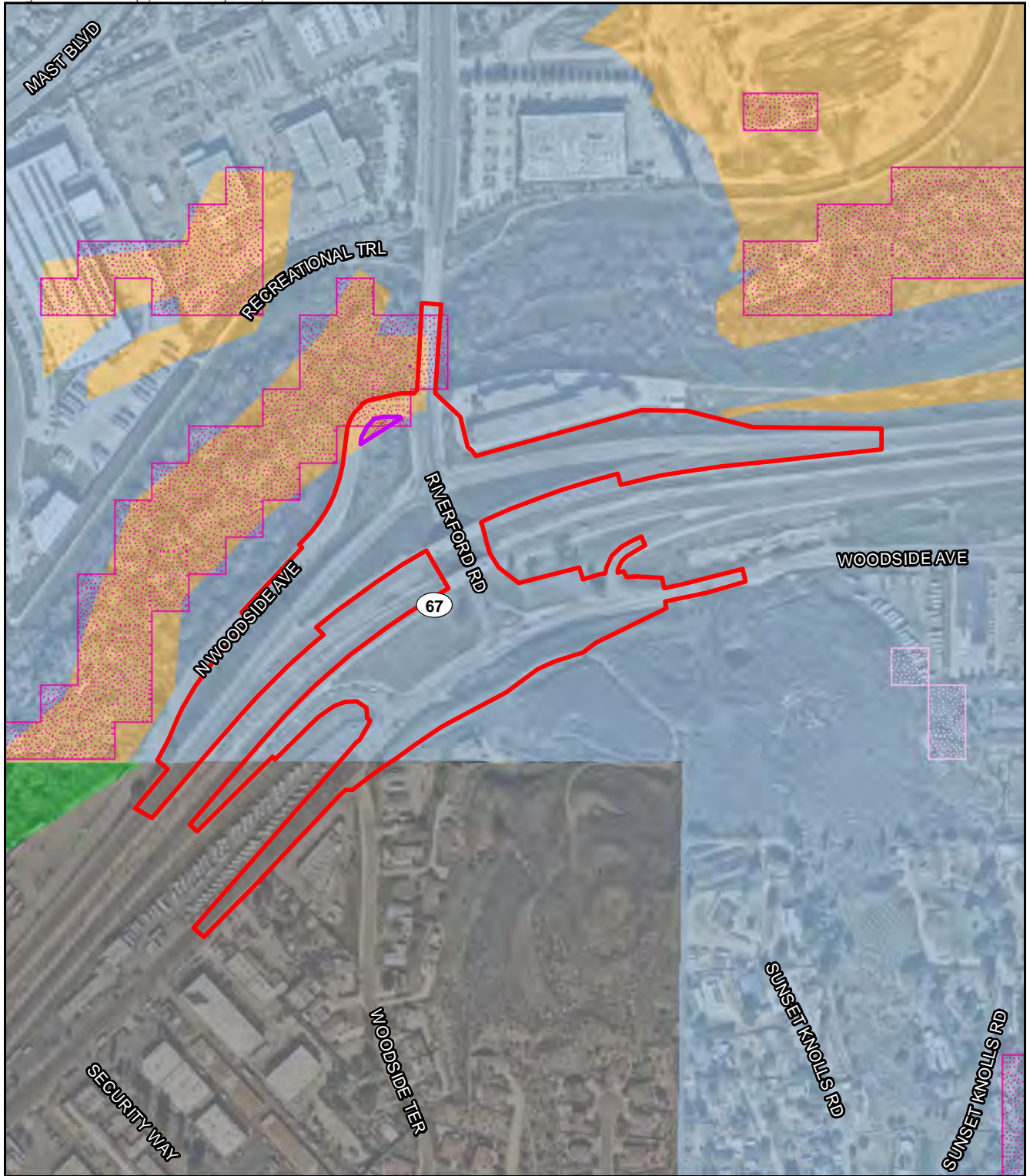
- 11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

The project is located within the Metro-Lakeside-Jamul segment within the South County Subarea of the MSCP. The project site's northwestern area contains a small portion of PAMA (0.07 acre) and qualifies as a BRCA, according to the six criteria of the County's BMO. Therefore, the project is required to conform with the MSCP, MSCP Subarea Plan, and the BMO. However, impacts to the BRCA, sensitive habitat, and sensitive species would be minimized to the extent feasible. Because the project proposes to improve existing public transportation and pedestrian facilities, largely, within their existing footprint, impacts would primarily occur adjacent to existing roadways and highway ramps. Mitigation would consist of either enhancement, restoration, and/or creation of habitat or deduction of credits from a pre-approved mitigation area or another off-site mitigation bank, including one that qualifies as a BRCA, consistent with the BMO. All feasible mitigation measures have been incorporated into this project. Those measures

include mitigating for impacts to sensitive vegetation communities at ratios consistent with those set forth in the BMO.

No feasible, less environmentally damaging, alternatives could be employed that would allow implementation of this essential public infrastructure project. Best Management Practices, such as Environmentally Sensitive Areas fencing, straw wattles, temporary gravel construction entrances, inlet protection, gravel bags, dust suppression measures, erosion and sediment control (e.g., silt fencing, gravel bags, fiber rolls, hydromulch, and hydroseeding), noise suppression measures, trash containment methods, a Stormwater Pollution Prevention Plan, and hydroseeding for slope stabilization would be implemented throughout the project site during construction.

Jeff Kashak, Environmental Planning Manager
Department of Public Works, Environmental Services Unit
October 25, 2024



Biological Study Area
 Project Impact Area

Habitat Evaluation Model
 Very High
 High

County of SD MSCP Sub Area Plan
 Pre-Approved Mitigation Area
 Unincorporated Land in Metro-Lakeside-Jamul Segment
 Biological Resource Core Area

City of Santee Draft MSCP
 100 Percent Conservation
 Outside Preserve

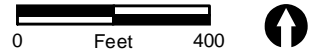


FIGURE
 Project in Relation to MSCP Preserve Area