MULTIPLE SPECIES CONSERVATION PROGRAM
DRAFT FINDINGS OF CONFORMANCE FOR

ASHWOOD STREET CORRIDOR IMPROVEMENTS PROJECT
1018734

November 12, 2019

I. Introduction

The proposed project consists of improvements to an approximately 1.3-mile segment of Ashwood Street within the unincorporated community of Lakeside in San Diego County. The proposed project is located within portions of the El Cajon and San Vicente U.S. Geological Survey (USGS) 7.5-minute series topographic quadrangles in the Lakeside Community Planning Area. The project is located in the County's Multiple Species Conservation Program (MSCP), and portions of the project are located within Biological Core Area 9 (Lake Jennings/Wildcat Canyon). Therefore, the project is required to conform to the MSCP, MSCP Subarea Plan, and the Biological Mitigation Ordinance.

A thorough discussion of project impacts and mitigation can be found in the project's associated Mitigated Negative Declaration. Significant impacts associated with the proposed project that are located within the South County MSCP include:

- Potential impacts to occupied habitat for the federally-threatened coastal California gnatcatcher and to other sensitive avian species.

- Permanent impacts to 0.03 acre of coast live oak woodland, 1.13 acres of Diegan coastal sage scrub (including disturbed), and 0.10 acre of non-native grassland.

- Temporary impacts to 0.06 acre of coast live oak woodland, 5.56 acres of Diegan coastal sage scrub (including disturbed), and 0.22 acre of non-native grassland.

Measures to mitigate significant impacts associated with the proposed project include:

- No grubbing or clearing of vegetation shall occur of occupied Diegan coastal sage scrub during the breeding season of the coastal California gnatcatcher (March 1 – August 15). To avoid impacts to upland migratory birds, grading, brush clearing, and all other construction within or adjacent to upland vegetation should be conducted outside the general migratory breeding season of February 15 to August 15 (inclusive of coastal California gnatcatcher). To avoid impacts to tree-nesting raptors, construction within or adjacent to riparian habitat should occur outside the tree-nesting raptor breeding season of January 15 to July 15. If construction must occur during these periods, preconstruction clearance surveys by a qualified biologist will be conducted in consultation with County Department of Public Works.

- Impacts to coast live oak woodland, Diegan coastal sage scrub, and non-native grassland within the South County MSCP would require habitat-based mitigation in compliance with the BMO.

Table 1. Impacts to Habitat (acres)

Habitat Type	Tier Level	Existing On-site		Temporary Impacts		Permanent Impacts	
		BRCA	Non-BRCA	BRCA	Non-BRCA	BRCA	Non-BRCA
Coast live oak woodland	I	0.04	0.05	0.03	0.03	0.01	0.02
Diegan coastal sage scrub	II	5.55	1.14	4.85	0.71	0.70	0.43
Non-native grassland	III	0.32	--	0.22	--	0.10	--
Non-native woodland	IV	0.14	0.43	0.08	0.37	0.06	0.06
Eucalyptus woodland	IV	0.03	0.05	0.01	0.02	0.02	0.03
Disturbed habitat	IV	2.95	1.67	2.60	0.94	0.35	0.73
Agriculture	IV	--	0.42	--	0.30	--	0.12
Urban/Developed	IV	2.07	11.94	1.65	5.00	0.42	6.94
TOTAL		**11.10**	**15.70**	**9.44**	**7.37**	**1.66**	**8.33**

BRCA=Biological Resource Core Area

Table 2. Required Mitigation for Permanent Impacts (acres)

Habitat Type	Tier Level	Permanent Impacts						
		BRCA			Non-BRCA			Total Mitigation
		Impact	Ratio	Mitigation	Impact	Ratio	Mitigation	
Coast live oak woodland	I	0.01	2:1	**0.02**	0.02	1:1	**0.02**	0.04
Diegan coastal sage scrub	II	0.70	1.5:1	**1.05**	0.43	1:1	**0.43**	1.48
Non-native grassland	III	0.10	1:1	**0.10**	--	n/a	--	0.10
TOTAL		**0.81**		**1.17**	**0.45**		**0.45**	1.62

BRCA=Biological Resource Core Area

The findings contained within this document are based on County records, staff site visits and the project's associated Biological Resources Technical Report prepared by RECON Environmental, Inc., dated October 29, 2019. 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 Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and 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 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 is located within the Metro-Lakeside-Jamul segment within the South County subarea of the MSCP. Under the MSCP, the project site contains portions that have been mapped as Pre-Approved Mitigation Areas (PAMAs) and portions are located with the mapped Biological Resource Core Area (BRCA) 9 – Lake Jennings/Wildcat Canyon. However, upon further review of the project site, staff revised the BRCA for the proposed project by eliminating land that does not meet the definition or criteria defined in the BMO. Project activities that would not include installation of permanent features, such as clearing for construction access, staging, and other effects activities are considered temporary impacts. These areas would be revegetated following construction.

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

Mitigation for the project's permanent impacts to upland vegetation communities within the South County MSCP would consist of either enhancement, restoration, and/or creation of habitat; deduction of credits from a County-approved mitigation area that qualifies as a BRCA; or other off-site preservation. All approved mitigation areas are considered BRCAs as defined by Article VI.A.1.b.i of the BMO.

III. Biological Mitigation Ordinance Findings

The proposed project will comply with the Biological Mitigation Ordinance.

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

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

The proposed project will 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.

However, the proposed project will impact land located within a Biological Resource Core Area.

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 goals of the project are to improve traffic movement and sight distance along the existing Ashwood Street at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. As a result, minor permanent impacts to surrounding habitat is necessary to construct the proposed safety improvements. These impacts include coast live oak woodland (0.03 acre, Tier I); Diegan coastal sage scrub (1.13 acres, Tier II); and non-native grassland (0.10 acre, Tier III). However, the majority of the project's 10-acre permanent impact footprint includes urban/developed lands (7.36 acres). The remaining impacts would occur to Tier IV habitat, including eucalyptus woodland, non-native woodland, disturbed habitat, and agriculture. Therefore the project meets the County's criterion to minimize impact 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 to an existing County-maintained road. Clustering of a roadway project is not feasible, but impacts will 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 improvements to an existing County-maintained road. The project would encroach into steep slopes; however, the project has been designed to avoid and minimize impacts to the maximum extent practicable. The proposed engineering design includes installation of a soil nail retaining wall and a soldier-pile retaining wall. Both of these retaining walls would stabilize the proposed cut slopes thereby preventing further grading or removal of habitat that would have otherwise been needed. 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 proposes improvements to an existing County-maintained road. The proposed project would improve safety for motorists through improved sight distance. The proposed project would also improve safety for bicyclists, pedestrians, and equestrians. Project impacts have been minimized to the maximum extent practicable while still maintaining the safety objectives of the proposed project.

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).**

   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 into wetlands defined by the State or U.S. Therefore, no wetland mitigation would be 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 an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road.

   Impacts to Diegan coastal sage scrub (including disturbed), coast live oak woodland, and non-native grassland occur directly adjacent to the existing road and are minimized. Mitigation for these upland impacts would consist of deducting appropriate credits from a County-approved mitigation area that qualifies as a BRCA. This 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 will permanently impact 0.03 acre of coast live oak woodland, 1.13 acres of Diegan coastal sage scrub (including disturbed), and 0.10 acre of non-native grassland directly adjacent to the existing road within the South County MSCP. Mitigation for upland impacts would consist of deduction of credits from a County-approved mitigation area 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 proposed project includes the improvement of an existing County-maintained road. Sensitive habitat that would be permanently impacted with the South County MSCP consists of coastal sage scrub, coast live oak woodland, and non-native grassland. All temporarily impacted areas will be revegetated on-site at a 1:1 ratio similar to pre-construction conditions. Native vegetation will be used to revegetate any cut and fill areas. Mitigation for permanent upland impacts would consist of deduction of credits from a County-approved mitigation area that qualifies as a BRCA. All mitigation will 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 goals of the project are to improve traffic movement and sight distance along the existing Ashwood Street at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. As a result, minor permanent impacts to surrounding habitat is necessary to construct the proposed safety improvements. These impacts include coast live oak woodland (0.03 acre, Tier I); Diegan coastal sage scrub (1.13 acres, Tier II); and non-native grassland (0.10 acre, Tier III). However, the majority of the project's 10-acre permanent impact footprint includes urban/developed lands (7.36 acres). The remaining impacts would occur to Tier IV habitat, including eucalyptus woodland, non-native woodland, disturbed habitat, and agriculture. All of these impacts occur directly adjacent to the existing road. Mitigation for permanent upland impacts would consist of deduction of

credits from a County-approved mitigation area that qualifies as a BRCA consistent with the BMO. Therefore, the project provides for the development of the least sensitive habitats and will 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 will not impact critical populations of sensitive plant species, significant populations of narrow endemic animal species, or narrow endemic plant species as none were identified within the project impact area.

7. Preserve the biological integrity of linkages between BRCAs.

The proposed project is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCAs. Further, the project proposes to improve an existing County-maintained road, and all impacts would occur directly adjacent to the existing road. The existing road traverses over the San Diego River corridor, which represents a local habitat linkage in the county. While the project includes repaving the existing road, improvements would be confined to the existing road width and does not include impacts to the San Diego River. Therefore, the project meets the County's criterion as it will 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).

One covered wildlife species, coastal California gnatcatcher (*Polioptila californica californica*), is known to occur onsite within the project limits. Approximately 0.70 acre of gnatcatcher-occupied coastal sage scrub would be permanently impacted by the proposed project. However, as the goals of the project are to improve traffic movement and sight distance along the existing Ashwood Street, all impacts would occur directly adjacent to existing roads. Mitigation for permanent impacts would consist of deduction of credits from a County-approved mitigation area 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 coastal California gnatcatcher.

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

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

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

The BMO defines a linkage as an area of land which supports or contributes to the long-term movement of wildlife and genetic material. The proposed project would

improve an existing County-maintained road and would maintain all habitat linkages as they currently exist.

The proposed project is located within the Lake Jennings/Wildcat Canyon BRCA and thus is not part of a regional linkage between BRCAs. Further, the project proposes to improve an existing County-maintained road, and all impacts would occur directly adjacent to the existing road. The existing road traverses over the San Diego River corridor, which represents a local habitat linkage in the county. While the project includes repaving the existing road, improvements would be confined to the existing road width and does not include impacts to the San Diego River. Therefore the project will maintain habitat linkages.

2. **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 the project includes repaving the existing road that traverses over the San Diego River, improvements would be confined to the existing road width. Therefore, the project meets the County's criterion to identify and protect existing movement corridors.

3. **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 the project includes repaving the existing road that traverses over the San Diego River, improvements would be confined to the existing road width. Therefore, the project meets the County's criterion to protect corridors with good vegetative and/or topographic cover.

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

   The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist.

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

   The proposed project is the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist. Therefore, the project meets the County's criterion to maintain long-term habitat linkages of adequate width.

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

   The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist.

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

   The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist.

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

   The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist.

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

   The proposed project includes improvements to an existing County-maintained road (Ashwood Street) and would maintain all habitat linkages as they currently exist. Under existing conditions, Ashwood Street traverses over the San Diego River, which represents a local habitat linkage. While the project includes repaving Ashwood Street where it traverses over the San Diego River, construction would be confined to the existing road width and does not include impacts to the San Diego River. Therefore, because Ashwood Street currently crosses the San Diego River under existing conditions, and because no alterations are proposed to this segment of Ashwood Street, the project meets the County's criterion to minimize barriers.

10. **Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated**

with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.

The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist. No alterations to road are proposed where it traverses the San Diego River, which represents a local habitat linkage.

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

    The proposed project includes the improvement of an existing County-maintained road and would maintain all habitat linkages as they currently exist. No alterations to road are proposed where it traverses the San Diego River, which represents a local habitat linkage.

IV. Subarea Plan Findings

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

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

   The proposed project would not encroach into wetlands defined by the State or U.S. Therefore, no wetland mitigation would be required and the project would comply with State and Federal wetland goals and policies.

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

   The proposed project consists of improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. Permanent impacts to coastal sage scrub, coast live oak woodland, and non-native grassland occur directly adjacent to the existing road and would be minimized. Mitigation for these upland impacts would consist of deducting appropriate credits from a County-approved mitigation area that qualifies as a BRCA. This 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 surrounding habitat is necessary to construct the proposed safety improvements. As a result, the proposed project would impact coast live oak woodland (0.03 acre, Tier I); Diegan coastal sage scrub (1.13 acres, Tier II); and non-native grassland (0.10 acre, Tier III). However, the majority of the project's 10-acre permanent impact footprint includes urban/developed lands (7.36 acres). The remaining impacts would occur to Tier IV habitat, including eucalyptus woodland, non-native woodland, disturbed habitat, and agriculture. Mitigation would consist of deduction of credits from a County-approved mitigation area that qualifies as a BRCA. Therefore, through mitigation, the project meets the County's criterion to provide for the conservation of spatially representative high and very high value habitats over 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 deduction of credits from a County-approved mitigation area that qualifies as a BRCA. All mitigation will be consistent with the BMO. Therefore, through mitigation, the project meets the County's criterion to create 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 has been designed to minimize impacts to sensitive habitats and sensitive species. The goals of the project are to improve traffic movement and sight distance along the existing Ashwood Street at various locations including El Capitan High School, County-owned Cactus Park, and the intersections of Ashwood Street with Mapleview Street and Willow Road. The proposed project would also enhance pedestrian access with the continuation of sidewalk along the west side of Ashwood Street between El Capitan High School and Cactus Park. As a result, minor permanent impacts to surrounding habitat is necessary to construct the proposed safety improvements. These impacts include coast live oak woodland (0.03 acre, Tier I); Diegan coastal sage scrub (1.13 acres, Tier II); and non-native grassland (0.10 acre, Tier III). However, the majority of the project's 10-acre permanent impact footprint includes urban/developed lands (7.36 acres). The remaining impacts would occur to Tier IV habitat, including eucalyptus woodland, non-native woodland, disturbed habitat, and agriculture. All of these impacts occur directly adjacent to the existing road. Mitigation for permanent upland impacts would consist of deduction of credits from a County-approved mitigation area 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 will only impact vegetation communities that are directly adjacent to the existing road. One covered wildlife species, coastal California gnatcatcher (*Polioptila californica californica*), is known to occur onsite within the project limits; however, the site is not believed to support key regional populations. In accordance with the BMO, habitat-based mitigation would occur for permanent impacts, which would consist of deduction of credits from a County-approved mitigation area that qualifies as a BRCA. Therefore, the proposed project will 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 deduction of credits from a County-approved mitigation area that qualifies as a BRCA. Through this mitigation, the project will 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.

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. Therefore, the proposed project will not adversely affect critical populations and narrow endemics as none were identified within the project impact area.

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 consists of improvements to an approximately 1.3-mile segment of Ashwood Street between Mapleview Street and approximately 1,000 feet north of the intersection with Willow Road. The proposed impacts would be minimized and would occur directly adjacent to the existing road. Therefore, the project will not jeopardize the assembly of a preserve within the Subarea Plan.

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

    The proposed project consists of improving the existing Ashwood Street that is maintained by the County. Mitigation for permanent impacts would consist of deduction of credits offsite from a County-approved mitigation area that qualifies as a BRCA.

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. Under the MSCP, the project site contains portions that have been mapped as PAMA, and portions are located with the Lake Jennings/Wildcat Canyon BRCA. However, upon further review of the project site, staff revised the BRCA for the proposed project by eliminating land that does not meet the definition or criteria defined in the BMO. Further, impacts to the BRCA, sensitive habitat, and sensitive species have been minimized to the extent feasible. As the project proposes to improve an existing County-maintained road, all impacts would occur directly adjacent to the existing road. Mitigation for permanent impacts would consist of deduction of credits from a County-approved mitigation area that qualifies as a BRCA.

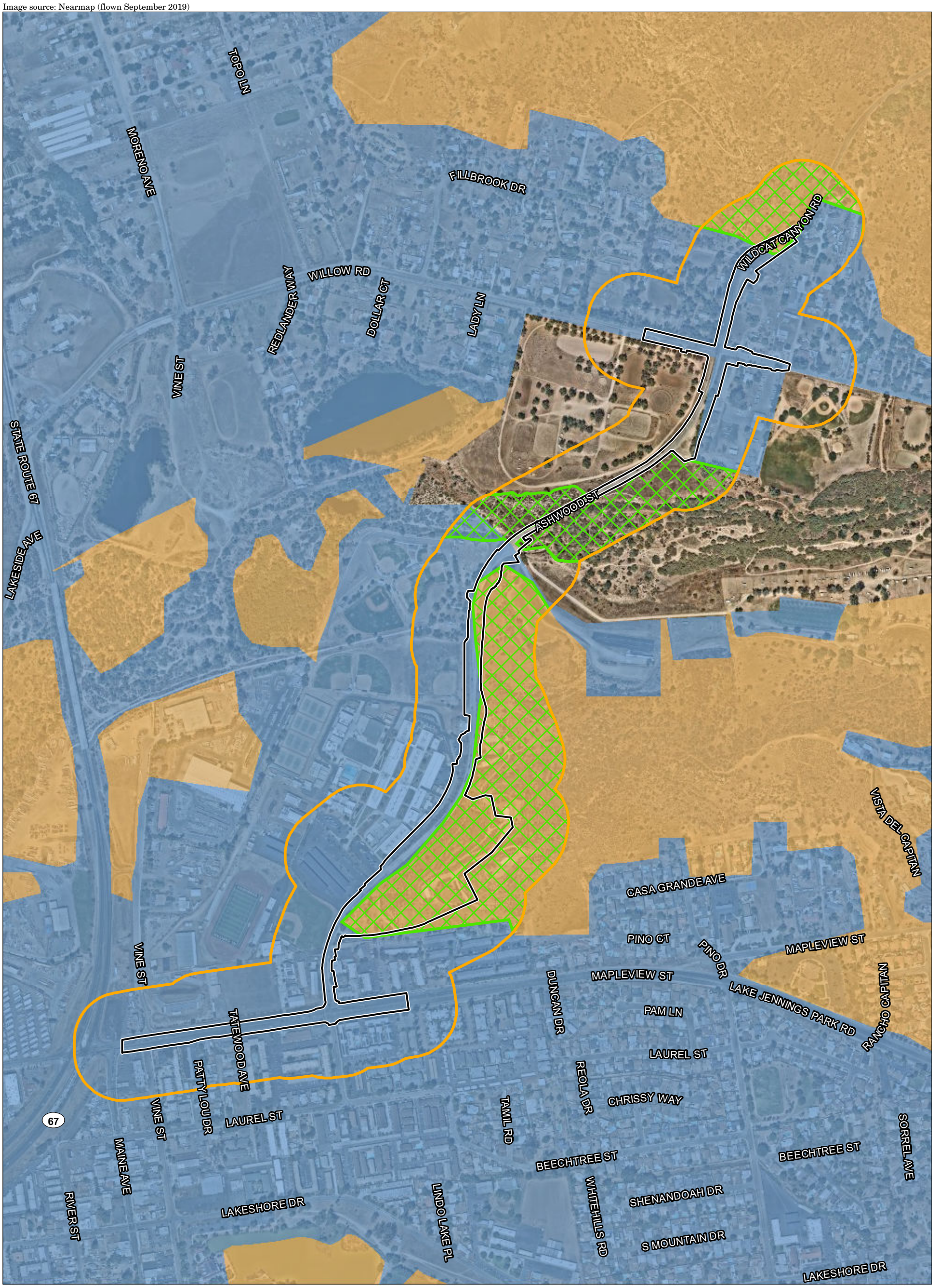
All feasible mitigation measures have been incorporated into this project. Those measures include mitigating for impacts to sensitive vegetation communities at ratios consistent with those set forth in the BMO.

No feasible, less environmentally damaging alternative could be employed that would allow implementation of this essential public project. Best Management Practices such as fencing, straw waddles, temporary gravel construction entrances, inlet protection, gravel bags, and hydroseeding for slope stabilization would be implemented throughout the project site during and after construction.

Jeff Kashak, Department of Public Works

November 12, 2019

Image source: Nearmap (flown September 2019)



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MSCP Preserve Area
Ashwood Street Corridor Improvements Project