

**APPENDIX G-5
SOUTHERN NCCP/HCP PLANNING GUIDELINES
CONSISTENCY FINDINGS**

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SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
SAN JUAN CREEK WATERSHED	
Chiquita Canyon Sub-Basin Protection Recommendations	
1. Protect the major north-south connection to Central San Juan Creek by providing a habitat linkage between Chiquita Creek and the eastern edge of the Ladera Open Space and by restricting new impervious surfaces west of Chiquita Creek in order to maintain habitat integrity between the creek and Chiquita Ridge.	Consistent. B-4 would be consistent because it would provide a habitat linkage in the Chiquita sub-basin to San Juan Creek by protecting Chiquita Ridge and proposing a pervious land use (golf course) west of Chiquita Creek.
2. Maintain east-west biological connectivity by protecting habitat linkages and wildlife corridors between Arroyo Trabuco, Chiquita Canyon, and Gobernadora Canyon. Biological connectivity should be maintained between Chiquita, Gobernadora and Arroyo Trabuco by protecting habitat linkages at a minimum of three locations within the sub-basin: 1) via rim-to-rim preservation of Sulphur Canyon (approximately 2,000 to 2,500 feet wide); 2) at the Narrows where the canyon is only 700-800 feet wide (approximately 3,000 feet south of Tesoro High School) and connects to Sulphur Canyon; and 3) in contiguous patches of coastal sage scrub through the major canyon north and east of the wastewater treatment plant.	Consistent. B-4 would be consistent because it would maintain east-west biological connectivity by protecting the "Narrows," protecting coastal sage scrub patches in the major canyon north and east of the wastewater treatment plant, and protecting Sulphur Canyon rim -to-rim . For B-4 to be consistent it would need to address wildlife movement across the proposed arterial within the Habitat Reserve proposed to connect the Gobernadora development area to Oso Parkway (i.e., the extension of Cristianitos Road) on Chiquadora Ridge and in the valley bottom . Avian species would be able to cross the roadways but culverts and possibly fencing would be needed to accommodate movement by ground-dwelling species.
3. Protect breeding and foraging habitat for the least Bell's vireo within Chiquita Canyon by focusing on protection of riparian habitat in Chiquita Creek.	Consistent. B-4 would be consistent because it would avoid impacts to the riparian habitat in Chiquita Creek and uplands west of the creek south of the wastewater treatment plant. B-4 also would restrict development west of the creek and north of the treatment plant to pervious surfaces and proposed golf course that would be consistent with maintaining upland foraging habitat for the vireo.
4. Protect breeding habitat and, to the extent feasible, protect foraging habitat for raptors and other species along Chiquita Creek.	Consistent. B-4 would be consistent because it would avoid raptor breeding habitat in Chiquita Creek. Adjacent foraging habitat would be maintained by the proposed golf course use north of the treatment plant and a development pattern which would avoid the major side canyons .
5. Protect riparian habitat in Chiquita Canyon by recognizing the influences of terrains and hydrology on the Chiquita Creek riparian system (see Watershed and Sub-basin Planning Principles).	Consistent. B-4 would be consistent because the development pattern proposed under B-4 considers the influence of terrains and hydrology on Chiquita Creek. The major side canyons would either be avoided along the entire western side of the creek and along both sides of the creek north of the treatment plant or a pervious land use (golf course) would be constructed.
6. Protect the two vernal pools and their contributing hydrologic sources along Radio Tower Road that support the Riverside fairy shrimp, San Diego fairy shrimp and western spadefoot toad. The vernal pools located on Chiquita Ridge are within the existing protected Ladera Open Space.	Consistent. B-4 would be consistent because it would avoid the Radio Tower Road vernal pools .

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
<p>7. Protect slope wetlands and maintain their primary sub-surface water supply recharge characteristics and, where avoidance is infeasible, minimize and mitigate impacts.</p>	<p>Not consistent. B-4 would not be consistent because it would impact two slope wetlands north of the treatment plant and east of the creek. It would not impact slope wetlands below the treatment plant or west of the creek. With regard to maintaining the primary recharge characteristics that support these wetlands project grading will not intersect the primary groundwater movement formations. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands.</p>
<p>8. In conjunction with the large population of 2,000 thread-leaved brodiaea flowering stalks on Chiquadora Ridge in the Gobernadora sub-basin, protect two of the four small locations of thread-leaved brodiaea in Chiquita Canyon. Combined with the large population on Chiquadora Ridge, protection of these key locations would contribute to protection of a major population.</p>	<p>Could be consistent. B-4 could be consistent because it would protect the large population of 2,000 brodiaea and through specific avoidance and project design features that would avoid two of the four small populations thereby contributing to the protection of a major population.</p>
<p>9. Protect the Chiquita Ridge important population and key location of many-stemmed dudleya totaling about 2,430 individuals in approximately 35 discrete locations. This population includes seven locations totaling 100 to 420 individuals each.</p>	<p>Consistent. B-4 would be consistent because it would avoid the important population and key location of many-stemmed dudleya on Chiquita Ridge.</p>
<p>10. Protect approximately six locations of intermediate mariposa lily along Chiquita Ridge together with the location south of the treatment plant that supports 660 individuals, totaling protection of about 1,600 individuals. Although these locations are scattered, together they comprise an important population in a key location</p>	<p>N/A</p>
<p>11. Protect the 14 locations of intermediate mariposa lily comprising the major population on Chiquadora Ridge that overlaps the Chiquita and Gobernadora sub-basins, for a total protection of 2,000 individuals.</p>	<p>N/A</p>
<p>12. Minimize impacts to the key location of southern tarplant west of Chiquita Creek in Middle Chiquita Canyon to the maximum extent feasible. Minimize impacts to the remainder of the major population in Middle Chiquita Canyon. Mitigate impacts to southern tarplant in a manner similar to the successful Tesoro mitigation project (ongoing mitigation projects in Chiquita Canyon have demonstrated over three successive years that this plant can be readily propagated from seed).</p>	<p>Could be consistent. B-4 could be consistent because it proposes a golf course west of Chiquita Creek, the design of which would minimize impacts to the key location and major population of southern tarplant.</p>
<p>13. Protect the major population of southern tarplant in a key location in Lower Chiquita Canyon.</p>	<p>Consistent. B-4 would be consistent because it would avoid impacts to this major population in a key location.</p>
<p>14. Protect the key locations of Coulter's saltbush in Middle and Lower Chiquita Canyon. Minimize impacts to important populations within the sub-basin and mitigate unavoidable impacts in Chiquita Canyon.</p>	<p>Could be consistent. B-4 could be consistent because it proposes a golf course west of Chiquita Creek, the design of which would minimize impacts to the key location and major population of Coulter's saltbush.</p>

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
15. Protect the two key locations of salt spring checkerbloom in the slope wetlands in lower Chiquita Canyon.	Consistent. B-4 would be consistent because it would avoid impacts to the slope wetlands in lower Chiquita supporting salt spring checkerbloom and their subsurface recharge characteristics would not be affected. With regard to maintaining the primary recharge characteristics that support these wetlands, Exhibit XX presents a cross section indicating that project grading will not intersect the primary groundwater movement formations. Given existing hardpan soils, future landscape irrigation and the protection of a significant portion of Chiquadora Ridge, recharge would be maintained into the deep groundwater system supporting the slope wetlands.
16. Protect the important population of the California gnatcatcher and coastal sage scrub in the portion of the sub-basin south of San Juan Creek to maintain resident and dispersal habitat for the gnatcatcher between Chiquita Ridge and San Juan Capistrano and San Clemente.	Consistent. B-4 would be consistent because it would avoid impacts to coastal sage scrub and gnatcatchers located south of San Juan Creek in the Chiquita sub-basin and therefore would maintain opportunities for resident and dispersal habitat between Chiquita Ridge and San Juan Capistrano and San Clemente.
17. Protect at least 80 percent of the existing coastal sage scrub and gnatcatcher locations within the major population within the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin.	Consistent. B-4 would be consistent because it would protect 88% of existing coastal sage scrub and 87% of gnatcatcher locations within the major population located in the Chiquita and Wagon Wheel sub-basins and the Chiquadora Ridge portion of the Gobernadora sub-basin.
18. Implement a cowbird trapping program to mitigate for impacts to existing habitat within the sub-basin and for potential impacts associated with future development. The cowbird trapping program will be evaluated on an annual basis and trap locations and trapping effort will be adjusted as part of the overall Adaptive Management Program (e.g., if the number of trapped cowbirds drops to a prescribed threshold, the trapping program may be terminated or otherwise modified).	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.
19. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing and minimization of human access and disturbance as part of the Adaptive Management Program.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances.
Chiquita Canyon Sub-Basin Restoration Recommendations	
20. Implement a coastal sage scrub (coastal sage scrub)/valley needlegrass grassland (VGL) restoration program to enhance habitat connectivity and mitigate for impacts to existing habitat associated with future development.	Consistent. B-4 would be consistent through implementation of the Adaptive Management Program, which includes a Habitat Restoration Plan component consistent with implementation of the CSS/VGL restoration recommendations.
21. Translocate salvaged thread-leaved brodiaea and many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration and enhancement areas in the sub-basin include Chiquita Ridge and Chiquadora Ridge.	Consistent. B-4 would be consistent because it would implement the Plant Species Translocation, Propagation, and Management Plan component of the Adaptive Management Program.
22. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable brodiaea and dudleya habitat and may contain seedbank.	Consistent. B-4 would be consistent because it would implement the Plant Species Translocation, Propagation, and Management Plan component of the Adaptive Management Program.

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
23. Initiate an intermediate mariposa lily seed collection program in 2003 [should this be 2003?] if sufficient rain falls to warrant the collection program. Receiver sites should be identified in the winter of 2003 [should this be 2003?] and a pilot planting program should be implemented to determine the effectiveness of propagation from seed.	N/A
24. Translocate salvaged intermediate mariposa lily bulbs to areas where suitable soil conditions occur. Specific translocation areas have not been identified, but based on the existing distribution potential general translocation areas in the sub-basin area include Chiquita Ridge and Chiquadora Ridge.	N/A
25. Translocate salvaged southern tarplant and Coulter's saltbush to suitable restoration and enhancement areas in the sub-basin. Receiver areas should support alkali soils suitable for both species and should be placed in locations that maximize connectivity and genetic exchange.	Consistent. B-4 would be consistent because it would implement the Plant Species Translocation, Propagation, and Management Plan component of the Adaptive Management Program.
26. Implement restoration efforts to address localized headcuts what is this? within the sub-basin as further described in the Watershed and Sub-basin Planning Principles – Chiquita Sub-basin.	Consistent. B-4 would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program.
27. Maintain a continuous upland habitat linkage along the east-facing slopes of Chiquadora Ridge between San Juan Creek and Sulphur Canyon.	Could be consistent. B-4 could be consistent because it would provide for a continuous habitat linkage along the east-facing slope of Chiquadora Ridge. However, for B-4 to be consistent, it would have to address wildlife movement along Chiquadora Ridge where the extension of Cristianitos Road connecting the Gobernadora development area to Oso Parkway would cross the ridgeline. Avifauna would be able to cross the roadway, but accommodation of movement by ground-dwelling wildlife would need to be addressed by a culvert and possibly fencing.
28. Protect Sulphur Canyon rim -to-rim to maintain a functional biological connection from Gobernadora to Gen. Thomas F. Riley Regional Park in Wagon Wheel Canyon and upper Chiquita Canyon.	Consistent. B-4 would be consistent because it would protect Sulphur Canyon rim -to-rim.
29. Protect a 2,000- to 2,500-foot area along the southern boundary of Coto de Caza to provide for functional east-west wildlife movement from Sulphur Canyon to Bell Canyon.	Not consistent. B-4 would not be consistent because it would provide an approximately 1,000 foot-wide area between proposed development and the southern boundary of Coto de Caza for east-west movement.
30. Minimize impacts to native grasslands. Any impacts resulting from future land uses will be addressed through an overall native grasslands restoration program. (Note: Anecdotal observations have documented native grassland in the Gobernadora sub-basin, but it has not been mapped or quantified. This task will be completed prior to completion of the EIR/EIS.	Not consistent. B-4 would not be consistent because the vast majority of grassland (native and non-native) in the sub-basin would be impacted. However, the Habitat Restoration Plan component of the Adaptive Management Program would provide for VGL restoration elsewhere in the planning area.
31. Protect the southern willow scrub in GERA that provides nesting habitat for least Bell's vireo, southwestern willow flycatcher, yellow-breasted chat, Cooper's hawk, red-shouldered hawk, and barn owl.	Consistent. B-4 would be consistent because it would avoid impacts to GERA as well as upstream habitat in Gobernadora.

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
32. Avoid and minimize impacts to oak woodlands in northern Gobernadora along the ridgelines between the Gobernadora and Bell Canyon sub-basins.	Consistent. B-4 would be consistent because it would include a setback from the Gobernadora/Bell ridgeline and also would provide for the protection of oak woodlands adjacent to the estates area.
33. Keep open sufficient valley bottom south of Coto de Caza and above the knickpoint [what is this] to allow creek meander for floodplain connection. Refer also to the Watershed and Sub-basin Planning Principles – Chiquita Gobernadora Sub-basin.	Consistent. B-4 would be consistent because development in the sub-basin would provide for sufficient open valley bottom south of Coto de Caza and above the knickpoint to allow creek meander for floodplain connection.
34. Protect sufficient grassland habitat in the valley bottom in the northern portion of lower Gobernadora in the study area property to support a nesting population of the tricolored blackbird. (The existing nesting ponds are located within Coto de Caza.)	Consistent. B-4 would be consistent because it would protect grassland habitat in the valley bottom in the northern portion of lower Gobernadora. The SMWD Multipurpose Basin would result in impacts to a portion of this grassland area, but these potential impacts to foraging grasslands could be offset by the expansion of wetland breeding habitat associated with the basin.
35. Protect the thread-leaved brodiaea major population in a key location supporting approximately 2,000 flowering stalks on Chiquadora Ridge.	Consistent. B-4 would be consistent because it would avoid this population.
36. Protect the 12 locations of intermediate mariposa lily comprising the major population on Chiquadora Ridge that overlaps the Chiquita and Gobernadora sub-basins, for total protection of about 1,580 individuals.	N/A
37. Protect the Chiquadora Ridge major population of many-stemmed dudleya totaling about 8,500 individuals in approximately 48 discrete locations. This population includes 24 locations totaling 100 to 750 individuals each, with nine of these locations numbering more than 500 individuals.	Consistent. B-4 would be consistent because it would protect about 40 of 48 locations (83%) totaling approximately 7,680 individuals (10%) in this major population of dudleya.
38. Protect the major population of southern tarplant totaling 10,000+ individuals located in GERA.	Consistent. B-4 would be consistent because it would avoid impacts to GERA and therefore would protect the major population of southern tarplant.
39. Consistent with the Species Accounts recommendations and the Planning Recommendations for the Chiquita sub-basin, protect at least 80 percent of the coastal sage scrub and gnatcatcher sites along the eastern slopes of Chiquadora Ridge to contribute to achieving the overall goal of protecting at least 80 percent of the major population of gnatcatchers extending from Chiquita Canyon across to Gobernadora Creek. A further goal is the maintenance of connectivity between the protected coastal sage scrub patches to allow for dispersal of gnatcatchers between patches.	Not consistent. B-4 would not be consistent because it would protect 57% of existing coastal sage scrub and 68% of gnatcatcher locations. However, connectivity among protected coastal sage scrub would be maintained.

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
Gobernadora Canyon Sub-Basin Management Recommendations	
40. Implement a cowbird trapping program to mitigate for impacts to existing habitat within the sub-basin and for potential impacts associated with future development. The cowbird trapping program will be evaluated on an annual basis and trap locations and trapping effort will be adjusted as part of the overall Adaptive Management Program (e.g., if the number of trapped cowbirds drops to a prescribed threshold, the trapping program may be terminated or otherwise modified).	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes cowbird trapping as part of the Invasive Species Control Plan.
41. Protect existing riparian habitat downstream of the knickpoint [what is this?] in GERA for the least Bell's vireo, southwestern willow flycatcher and other riparian nesting bird species.	Consistent. B-4 would be consistent because it would avoid GERA and upstream development.
42. Protect downstream habitat for the arroyo toad, least Bell's vireo, arroyo chub, and other sensitive riparian and aquatic species by maintaining hydrology, water quality and sediment delivery in San Juan Creek and minimizing additional loadings of nutrients or toxics.	Consistent. B-4 would be consistent because management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. Hydrology and sediment transport would be improved through invasive species control.
43. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
Gobernadora Canyon Sub-Basin Restoration Recommendations	
44. Implement a coastal sage scrub restoration program in Sulphur Canyon to enhance habitat connectivity and mitigate for impacts to existing habitat associated with future development.	Consistent. B-4 would be consistent because it proposes no development in Sulphur Canyon and would implement an Adaptive Management Program that includes a Habitat Restoration Plan that targets Sulphur Canyon for coastal sage scrub restoration.
45. Translocate salvaged many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration and enhancement areas in the sub-basin include Chiquadora Ridge. Receiver areas should support clay soils suitable for dudleya and should be placed in locations that maximize connectivity and genetic exchange.	Consistent. B-4 would be consistent because it proposes development in this sub-basin consistent with implementation of the CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Plant Species Translocation, Propagation, and Management Plan.
46. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Consistent. B-4 would be consistent because it proposes development in this sub-basin consistent with implementation of the CSS/VGL restoration recommendations via implementation of the Adaptive Management Program and the Plant Species Translocation, Propagation, and Management Plan.
47. Translocate salvaged intermediate mariposa lily bulbs to areas where suitable soil conditions occur. Specific translocation areas have not been identified, but based on the existing distribution, potential general translocation areas in the sub-basin area include Chiquadora Ridge.	N/A

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PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
48. Initiate an intermediate mariposa lily seed collection program in 2003 if sufficient rain falls to warrant the collection program . Receiver sites should be identified in the winter of 2003 and a pilot planting program should be implemented to determine the effectiveness of propagation from seed.	N/A
49. Implement a restoration program in Gobernadora Creek which addresses (1) the historic creek meander above the knickpoint; and (2) upstream land use induced channel incision and erosion, including potentially excessive surface and groundwater originating upstream.	Consistent. B-4 would be consistent because it would implement the Habitat Restoration Plan component of the Adaptive Management Program .
CENTRAL SAN JUAN AND TRAMPAS CANYON SUB-BASIN	
Central San Juan Subunit Protection Recommendations	
50. Maintain and manage riparian and aquatic habitats along San Juan Creek for breeding populations of the arroyo toad, least Bell's vireo, and other sensitive species such as yellow warbler, yellow-breasted chat, raptors, southwestern pond turtle, two-striped garter snake, western spadefoot toad, silvery legless lizard, arroyo chub, and threespine stickleback.	Consistent. B-4 would be consistent because it would avoid riparian and aquatic habitats along San Juan Creek and management would occur through implementation of the Adaptive Management Program, including the Invasive Species Control Plan, Habitat Restoration Plan and Grazing Management Plan. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. Hydrology and sediment transport would be improved through invasive species control. A realigned Ortega Highway would bridge San Juan Creek and avoid aquatic resources.
51. Provide upland foraging and estivation habitat within the upland terraces in the floodplain of San Juan Creek, with a particular focus on the south side of the creek, to maintain existing population levels of the arroyo toad.	Consistent. B-4 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace foraging habitat. Proposed development on the south side of the creek would be limited to the Trampas sub-basin and within the Central San Juan sub-basin low density development that would be set back from the creek. B-4 also proposes relocation of Ortega Highway which would provide improved foraging/estivation habitat south of the creek.
52. Protect upland habitat adjoining riparian and aquatic habitats to support nesting sites of southwestern pond turtle.	Consistent. B-4 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace foraging habitat. Proposed development on the south side of the creek would be limited to the Trampas sub-basin and within the Central San Juan sub-basin low density development that would be set back from the creek. B-4 also proposes relocation of Ortega Highway which would provide improved nesting/estivation habitat south of the creek.
53. Protect upland habitat adjoining riparian and aquatic habitats to support all life stages of western spadefoot toad.	Consistent. B-4 would be consistent because it would avoid San Juan Creek and adjacent floodplain terrace estivation habitat.

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54. Protect breeding habitat and, to the extent feasible, protect foraging habitat for raptors adjacent to San Juan Creek.	Not consistent. B-4 would not be consistent because although breeding habitat in San Juan Creek and adjacent major tributaries (e.g., Chiquita, Gobernadora) would be protected and impacts to adjacent foraging habitat in Chiquita sub-basin would be reduced through avoidance of the major alluvial canyons, impacts to foraging habitat in Chiquita, Gobernadora, and Trampas would occur under B-4.
55. Provide floodplain and upland habitat linkages adjacent to San Juan Creek for east-west and north-south dispersal by the California gnatcatcher between the Chiquita Canyon and Cristianitos sub-basins.	Consistent. B-4 would be consistent because it would provide for upland habitat linkages in an east-west direction by the protection of San Juan Creek and adjacent floodplain terraces. The north-south movement would be provided by protection of Chiquita and Chiquadora ridges, protection of San Juan Creek and adjacent floodplain terraces, and protection of the coastal sage scrub and gnatcatcher sites located in the northern portion of the Cristianitos sub-basin (linkages/corridors C, G, J, and N).
56. Provide a habitat linkage at the confluences of Verdugo Canyon and Bell Canyon with San Juan Creek. Maintain an adequate habitat linkage along central San Juan Creek for "live-in" dispersal and movement habitat for terrestrial species, including mountain lion, bobcat, coyote, and mule deer between sub-basins and especially between Chiquita Ridge, Canada Gobernadora, Bell Canyon, upper San Juan Creek, Verdugo Canyon, Trampas Canyon, and Cristianitos Canyon.	Consistent. B-4 would be consistent because it would provide for a habitat linkage (J) at the confluence of Bell, Verdugo and San Juan Creeks. Linkage J would have a minimum width of 300 ft within the San Juan Creek floodplain for approximately 1,000 linear feet along the edges of the Gobernadora and East Ortega development areas, beyond which it then broadens at either end (i.e., an hourglass shape). B-4 would protect linkages between central San Juan Creek (J) and Chiquita Ridge (C), Canada Gobernadora (G), Bell Canyon (J), upper San Juan Creek (J), Verdugo Canyon (J, L, M), Trampas Canyon (J, K), and Cristianitos Canyon (J, N). The realignment of Ortega Highway would include a bridge over San Juan Creek south of the confluence with Bell Canyon which would be constructed to avoid impacts to the habitat linkage.
57. Address the potential to improve north-south movement of large wildlife between San Juan Creek and Trampas Canyon and Cristianitos Canyon by assessing the benefits and feasibility of relocating Ortega Highway to the north side of San Juan Creek.	Consistent. B-4 would be consistent because it proposes the relocation of Ortega Highway to the north side of San Juan Creek.
58. Implement a bullfrog control program for the Cal-Mat Lake within San Juan Creek to help protect arroyo toads.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes bullfrog control as part of the Invasive Species Control Plan.
59. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
Central San Juan Subunit Restoration Recommendations	
60. In coordination with upstream eradication efforts, implement a giant reed control program for San Juan Creek within Rancho Mission Viejo boundaries to protect arroyo toad habitat and other riparian areas.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes giant reed control as part of the Invasive Species Control Plan.

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61. Translocate salvaged many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential nearby restoration and enhancement include Chiquadora Ridge. Receiver areas should support clay soils suitable for many-stemmed dudleya and should be placed in locations that maximize connectivity and genetic exchange.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes many-stemmed dudleya salvage and translocation to Chiquadora Ridge as part of the Plant Species Translocation, Propagation, and Management Plan.
62. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Consistent. B-4 would be consistent because it would implement the Plant Species Translocation, Propagation, and Management Plan as part of the Adaptive Management Program.
63. Translocate salvaged intermediate mariposa lily bulbs to areas where suitable soil conditions occur. Specific translocation areas have not been identified, but based on the existing distribution, potential general translocation areas in the sub-basin area include Chiquadora Ridge.	N/A
64. Initiate an intermediate mariposa lily seed collection program in 2003 if sufficient rain falls to warrant the collection program. Receiver sites should be identified in the winter of 2003 and a pilot planting program should be implemented to determine the effectiveness of propagation by seed.	N/A
Trampas Canyon Subunit Planning Recommendations	
65. Protect the vernal pools and their contributing hydrologic sources, Riverside fairy shrimp and San Diego fairy shrimp, as well as the slope wetlands and their primary sub-surface water supply recharge characteristics along Radio Tower Road.	Consistent. B-4 would be consistent because it would protect the Radio Tower Road vernal pools and slope wetlands and their contributing hydrologic sources.
66. Avoid impacts to the important populations of California gnatcatchers and coastal sage scrub to the maximum extent feasible to maintain resident and dispersal habitat for the gnatcatcher between San Juan Creek and Cristianitos Canyon and populations on Camp Pendleton.	Consistent. B-4 would be consistent because it would avoid important population 9 (Trampas Canyon) and minimize impacts to important population 11 (upper Cristianitos Canyon). B-4 thus would provide for resident and dispersal habitat from San Juan Creek through the Trampas sub-basin to the Cristianitos sub-basin southward to Camp Pendleton.
67. Maintain upland north-south habitat linkages through the central and western portions of the Trampas Canyon subunit to convey wildlife movement and dispersal (especially gnatcatchers) between San Juan Creek, San Juan Capistrano, San Clemente, Cristianitos Canyon, the Donna O'Neill Conservancy at Rancho Mission Viejo, and Camp Pendleton.	Consistent. B-4 would be consistent because it would protect the north-south habitat linkages J and K. B-4 would minimize impacts to linkage N through flexible golf course design and provision of a setback from Cristianitos Creek.
68. Maintain upland east-west habitat linkage/wildlife corridor south of the artificial lake to link Prima Deshecha, Talega Open Space, and other habitat to the west in San Juan Capistrano and San Clemente with the Donna O'Neill Land Conservancy and the Gabino, La Paz, and Talega movement corridors. This habitat linkage should allow for dispersal of gnatcatchers and other avian species, as well as provide a movement corridor for large mammals such as bobcat, coyote, and mule deer.	Not consistent. B-4 would not be consistent because the east-west portion of habitat linkage K south of Trampas Canyon Dam, which links to Prima Deshecha, Talega Open Space and other habitat to the west in San Juan Capistrano and San Clemente, would be constrained.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
69. Address the potential to improve north-south movement of large wildlife between San Juan Creek and Trampas Canyon and Cristianitos Canyon by assessing the benefits and feasibility of relocating Ortega Highway to the north side of San Juan Creek.	Consistent. B-4 would be consistent because it proposes the relocation of Ortega Highway to the north side of San Juan Creek.
70. Maintain and manage riparian and aquatic habitats along San Juan Creek for arroyo toad, least Bell's vireo, and other sensitive species such as yellow warbler, yellow-breasted chat, raptors, southwestern pond turtle, two-striped garter snake, western spadefoot toad, silvery legless lizard, arroyo chub and threespine stickleback.	Consistent. B-4 would be consistent because would avoid riparian and aquatic habitats along San Juan Creek and management would occur through implementation of the Adaptive Management Program, including the Invasive Species Control Plan, Habitat Restoration Plan, and Grazing Management Plan. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. Hydrology and sediment transport would be improved through invasive species control.
71. Protect upland terraces and habitat adjoining San Juan Creek to support arroyo toad foraging and estivation.	Consistent. B-4 would be consistent because it would avoid the upland terraces within the 100-year floodplain of San Juan Creek and therefore protect arroyo toad breeding and estivation habitat. In addition, B-4 would protect most of the uplands south of San Juan Creek and the East Ortega development would be low density and allow for minimization of impacts.
72. Protect the Trampas Canyon subunit component (approximately nine discrete locations) of the major population of many-stemmed dudleya that extends from the southern portion of the Trampas Canyon in the north, through the Cristianitos Canyon sub-basin south to the Talega development open space located in the San Clemente Watershed.	Consistent. B-4 would be consistent because it would avoid the locations of many-stemmed dudleya in the Trampas Canyon subunit.
73. Protect the eight known locations of intermediate mariposa lily comprising an important population in the subunit.	N/A
Trampas Canyon Subunit Management Recommendations	
74. Maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek to preserve breeding habitat for the arroyo toad population and other aquatic species in San Juan Creek.	Consistent. B-4 would be consistent because it would maintain stormwater flow characteristics comparable to existing conditions from Trampas Canyon into San Juan Creek through implementation of the water quality management. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. Hydrology and sediment transport would be improved through invasive species control.
75. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Consistent. B-4 would be consistent because it would implement an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
Verdugo Canyon Sub-Basin Protection Recommendations	
76. Protect, to the extent feasible, patches of coastal sage scrub and patches of southern cactus scrub that support cactus wren with a focus on maintaining contiguous habitat patches that provide north-south dispersal opportunities for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.	Consistent. B-4 would be consistent because it would maintain adequate contiguous patches of coastal sage scrub around proposed estate lots to provide dispersal habitat for the cactus wren and other species between the Lucas Canyon sub-basin to the north, and the Gabino Canyon/Blind Canyon and La Paz sub-basins to the south.
77. Maintain habitat connectivity for movement of large mammals such as mountain lion, bobcat, coyote, and mule deer between San Juan Creek and Cleveland National Forest; and between upper Verdugo Canyon and the headwaters of Gabino Creek.	Consistent. B-4 would be consistent because it would provide for habitat connectivity along San Juan Creek to the CNF (linkage J), and between upper Verdugo Canyon and the headwaters of Gabino Creek (linkage M). B-4 proposes no development in upper Verdugo Canyon, thus allowing for unrestricted wildlife movement.
78. Protect riparian habitat that provides nest sites for Cooper's hawk, red-tailed hawk, red-shouldered hawk, and barn owl.	Consistent. B-4 would be consistent because it would avoid impacts to raptor riparian breeding habitat by siting estate homes in the sub-basin away from habitat. B-4 proposes to upgrade an existing gravel Ranch road to rural collector road through a portion of the sub-basin to the south of Verdugo Canyon. This road is not anticipated to have substantial impacts on riparian habitat.
79. Protect grassland and wetland/riparian habitat at the mouth of Verdugo Canyon near Ortega Highway to retain tricolored blackbird habitat and to provide for wildlife movement to San Juan Creek.	Not consistent. B-4 would not be consistent because while it would avoid impacts to wetland/riparian habitat at the mouth of Verdugo Canyon, proposed estates in the southern portion of the mouth of the canyon would impact grassland habitat.
80. Protect Verdugo Canyon hydrology to maintain sources of coarse sediment that are important for arroyo toad breeding habitat in downstream areas.	Consistent. B-4 would be consistent because it would maintain existing hydrology in Verdugo Canyon through siting of the estate lots to avoid Verdugo Creek and implementation of the Water Quality Management Plan component of the Adaptive Management Program which addresses both pollutants of concern and conditions of concern.
81. Protect a habitat linkage, consisting of the Donna O'Neill Land Conservancy and an area along the east side of Cristianitos Creek, to provide connectivity for gnatcatchers in the upper portion of the sub-basin with other populations in Lower Gabino Creek and Camp Pendleton along lower Cristianitos/San Mateo Creek, and to maintain habitat integrity through connectivity within the Donna O'Neill Land Conservancy at Rancho Mission Viejo.	Consistent. B-4 would be consistent because it would provide an area along the east side of Cristianitos Creek which, when combined with the O'Neill Conservancy, would form a north-south habitat linkage (N) connecting gnatcatcher populations in upper Cristianitos sub-basin to other populations in Lower Gabino Creek and Camp Pendleton. B-4 also would maintain habitat integrity through connectivity within the O'Neill Conservancy.
82. Protect appropriate wetland and upland habitats to support a nesting population of the southwestern pond turtle, which occurs in the upper portion of the watershed in a small stockpond along Cristianitos Creek.	Could be consistent. B-4 could be consistent through golf course design features (e.g., water features) and the Adaptive Management Program that would avoid impacts to breeding and nesting/estivation habitat for the pond turtle.
83. Protect wetlands and adjoining upland habitat to support all life stages of western spadefoot toad.	Could be consistent. B-4 could be consistent through golf course design features (e.g., water features) and the Adaptive Management Program that would avoid impacts to breeding and estivation habitat for the spadefoot toad in the stockpond in upper Cristianitos. In lower Cristianitos at the confluence with Gabino Creek, breeding and estivation habitat would be avoided.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
84. Avoid riparian/wetland habitat, including alkali wetlands, to the maximum extent feasible.	Could be consistent. B-4 could be consistent through project design features incorporated into the golf course in upper Cristianitos that would avoid wetland/riparian habitat, and particularly the alkali wetlands, to the maximum extent feasible. Impacts to the remainder of Cristianitos Creek downstream would be avoided.
85. Protect the majority of native grasslands in the sub-basin.	Not consistent. B-4 would not be consistent because only 27% of native grasslands in the sub-basin would be protected. However, the amount of native grassland protected could be increased through golf course design features in upper Cristianitos, but the acreage protected cannot be estimated at this time.
86. Protect breeding habitat and, to the extent feasible, foraging habitat for resident and wintering raptor species.	Not consistent. B-4 would not be consistent because while riparian breeding habitat associated with Cristianitos Creek would be avoided, substantial impacts to adjacent grassland foraging habitat would occur.
87. Protect the majority of the cactus wren locations within the sub-basin.	Consistent. B-4 would be consistent because 63% of cactus wren locations in the sub-basin would be protected
88. Maintain a north-south habitat linkage along Cristianitos Creek between San Juan Creek and lower San Mateo Creek for dispersal and movement of gnatcatchers and other avian species, as well as large mammals such as mountain lion, bobcat, coyote, and mule deer, and, in particular, avoid occupied coastal sage scrub habitat in upper Cristianitos Canyon.	Could be consistent. B-4 could be consistent because potential impacts to linkage N in upper Cristianitos would be minimized through flexibility of the golf course design and provision of a setback of the Cristianitos Canyon "development bubble" from the creek of typically about 500 ft, with a minimum of about 200 ft.
89. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. B-4 would be consistent because it would provide adequate open space to protect wildlife movement along Gabino Creek (linkage O), at the Gabino/Cristianitos confluence, and to the O'Neill Conservancy. (Note: A new collector road would be required to connect to development in the Cristianitos sub-basin, but the segment in the Habitat Reserve would be constructed in the Gabino and Blind Canyons sub-basin discussed below).
90. Protect the three locations supporting approximately 4,500 flowering stalks of thread-leaved brodiaea on the hill outcrop adjacent to the clay mine pits in the southern portion of Cristianitos Canyon.	Could be consistent. B-4 could be consistent if the three locations of thread-leaved brodiaea are protected by achieving performance criteria for avoidance of the three locations.
91. Protect 10 of the 13 small, scattered locations of thread-leaved brodiaea in Cristianitos Canyon, totaling approximately 285 flowering stalks, to achieve the objective of protecting important populations in key locations. Maintain a continuous habitat connection between these scattered populations to allow for interactions and genetic exchange between the populations. These locations provide a linkage between other brodiaea locations in the area and the area has good potential for enhancement and restoration.	Could be consistent. B-4 could be consistent through golf course design features in upper Cristianitos designed to avoid at least 10 of 13 locations totaling 285 individuals.
92. Protect the major population of many-stemmed dudleya extending from the southern portion of the Trampas Canyon subunit in the north, through the Cristianitos Canyon sub-basin south to the Talega development open space located in the San Clemente Watershed. This area supports the largest major population in the subregion with approximately 19,300 individuals in about 69 discrete locations.	Could be consistent. B-4 could be consistent because with golf course design features to avoid dudleya in upper Cristianitos, it would protect approximately 90% of discrete locations and 69% of individuals in the Cristianitos sub-basin portion of the major population.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
93. Protect the two known important populations of Coulter's saltbush in the sub-basin.	Could be consistent. B-4 could be consistent because (1) the eastern population would be completely avoided, and (2) the western population could be protected by incorporating golf course design features that would protect the population.
Cristianitos Canyon Sub-Basin Management Recommendations	
94. Pursuant to the Grazing Management Plan, implement grazing management techniques to help protect listed and other selected species and habitat, promote perennial grasses including native grasses, allow for continued cattle grazing sufficient to support cattle ranching operations, and, where appropriate, reduce fuel loads for fire.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes a Grazing Management Plan component.
95. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
Cristianitos Canyon Sub-Basin Restoration Recommendations	
96. Implement a native grasslands restoration program, which will likely include grazing as a grassland restoration technique, as set forth in the Grazing Management Plan, for the upper portion of the sub-basin.	Not consistent. B-4 would not be consistent because although it proposes implementation of an Adaptive Management Program which includes a Grazing Management Plan and Habitat Restoration Plan, the proposed development pattern under B-4 conflicts with some areas targeted for restoration in upper Cristianitos. It would, however, allow partial implementation of the CSS/VGL restoration recommendations.
97. Translocate salvaged thread-leaved brodiaea and many-stemmed dudleya to CSS/VGL restoration and enhancement areas where feasible and appropriate. Potential restoration and enhancement areas in the sub-basin include upper Cristianitos Canyon and the southern portion of the Trampas Canyon subunit. Receiver areas should support clay soils suitable for brodiaea and dudleya, and should be placed in locations that maximize connectivity and genetic exchange.	Not consistent. B-4 would not be consistent because the proposed development pattern sub-basin conflicts with some areas targeted for restoration in upper Cristianitos. However, B-4 would allow partial implementation of the CSS/VGL restoration recommendations and the Plant Species Translocation, Propagation, and Management Plan. Translocation could occur in the Trampas sub-basin and portions of the Cristianitos sub-basin.
98. Salvage clay topsoils from development areas where feasible and appropriate and transport to restoration areas. Salvaged topsoils may be used to create additional suitable brodiaea and dudleya habitat and may contain seedbank.	Consistent. B-4 would be consistent because the proposed development pattern would allow partial implementation of the CSS/VGL restoration recommendations and the Plant Species Translocation, Propagation, and Management Plan. Salvage and transport of clay soils to the Trampas sub-basin and portions of the Cristianitos sub-basin, and elsewhere, could occur.
99. Translocate salvaged intermediate mariposa lily bulbs to areas where suitable soil conditions occur. Specific translocation areas have not been identified, but based on the existing distribution, potential general translocation areas in the sub-basin area include upper Cristianitos Canyon and the southern portion of the Trampas Canyon subunit.	N/A

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
100. Initiate an intermediate mariposa lily seed collection program in 2003 if sufficient rain falls to warrant the collection program . Receiver sites should be identified in the winter of 2003 and a pilot planting program should be implemented to determine the effectiveness of propagation from seed.	N/A
101. Protect the upper watershed headwaters, address erosion from the clay pits and implement creek stabilization actions to address localized erosion presently causing increases in fine sediment yields in Upper Cristianitos Creek per the “Watershed and Sub-Basin Planning Principles.”	Consistent. B-4 would be consistent because habitat restoration to address erosion in the eastern part of the headwaters would be implemented. The proposed golf course in the western portion of the headwaters area would provide a pervious surface to help reduce erosion of fine sediments . Development of the residential estates would impact only a very small portion of the headwaters area. Finally, B-4 would address erosion from the clay pits and implement creek stabilization actions to address localized erosion.
GABINO AND BLIND CANYONS SUB-BASIN	
Upper Gabino Subunit Protection Recommendations	
102. Protect a habitat linkage along Upper Gabino to allow dispersal of large mammals.	Consistent. B-4 would be consistent because it proposes limited development consisting of a golf course, estate homes and 20 acres of attached homes the Upper Gabino subunit. The limited development area allows for protection of considerable open space outside the development area and through the golf course itself. Wildlife movement along Gabino Creek would be maintained under B-4, as would wildlife movement from Gabino into Verdugo (linkages O and M).
103. Maintain contiguity and connectivity of coastal sage scrub to provide dispersal habitat for the cactus wren and other sensitive coastal sage scrub species.	Consistent. B-4 would be consistent because it proposes limited development consisting of a golf course, estate homes and 20 acres of attached homes for the Upper Gabino subunit, largely in grassland habitat. The limited development area allows for protection of considerable open space outside the development area and through the golf course itself. The contiguity of coastal sage scrub would be maintained under this development pattern.
104. Minimize, to the extent feasible, impacts to grassland foraging habitat for resident and wintering raptors, as well as “live-in” habitat for several other wildlife species that potentially occur in the subunit, including grasshopper sparrow, wintering burrowing owls, badger, spadefoot toad and horned lark.	Consistent. B-4 would be consistent because approximately 358 acres (70%) of grasslands (annual and native) would be protected in the Upper Gabino subunit.
105. Protect Jerome Lake and surrounding uplands to maintain nesting habitat for the southwestern pond turtle.	Could be consistent. B-4 could be consistent because it would protect Jerome’s Lake and surrounding upland habitat through golf course project design features that would ensure adequate upland habitat for pond turtle nesting and estivation.
106. Protect the majority of native grasslands within the subunit. Manage and restore protected native grasslands in accordance with the management and restoration recommendations described below, including grazing management techniques.	Consistent. B-4 would be consistent because 64% of native grasslands in the subunit would be protected. In addition, B-4 proposes implementation of the Adaptive Management Program including the Habitat Restoration Plan and Grazing Management Plan to restore protected native grasslands in the subunit. Approximately 14 acres of annual grassland that are restorable to native grassland would be protected in the subunit.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
107. Protect the approximately six known discrete locations of many-stemmed dudleya in the subunit that are part of the major population in a key location. (Note that two of the locations mapped as part of the major population are in the Middle Gabino Canyon subunit but are included in this analysis.)	Could be consistent. B-4 could be consistent because through careful siting and design of estate lots, it would avoid all 6 locations.
108. Protect the important population of Coulter's saltbush in the subunit.	Could be consistent. B-4 could be consistent because it would protect Coulter's saltbush through avoidance criteria incorporated into golf course project design.
Upper Gabino Subunit Restoration Recommendations	
109. Implement a CSS/VGL restoration and enhancement program, which will likely include grazing grassland restoration techniques set forth in the Grazing Management Plan.	Not consistent. B-4 would not be consistent because the proposed development pattern would conflict with areas targeted for the CSS/VGL restoration plan proposed under the Adaptive Management Program. However, the proposed development pattern would provide for partial implementation of the CSS/VGL restoration recommendations in the northern portion of the subunit.
110. Translocate any impacted many-stemmed dudleya to CSS/VGL restoration and enhancement areas in Upper Gabino where feasible and appropriate. Receiver areas should support clay soils suitable for dudleya.	Could be consistent. B-4 could be consistent because the proposed development pattern would provide for translocation on many-stemmed dudleya to any areas in the northern portion of the CSS/VGL restoration area that supports clay soils.
111. Salvage clay topsoils from development areas where feasible and transport to restoration areas. Salvaged topsoils may be used to create additional suitable dudleya habitat and may contain seedbank.	Consistent. B-4 would be consistent because clay topsoil salvage and transport to other restorations areas could occur via implementation of Plant Species Translocation, Propagation, and Management Plan component of the Adaptive Management Program.
112. Implement a creek restoration program in the subunit to address erosion that is generating increases in fine sediment yields in Upper Gabino.	Consistent. B-4 would be consistent because through implementation of the Habitat Restoration Plan component of the Adaptive Management Program and the development proposed for Upper Gabino under B-4, fine sediment yields would be decreased.
Middle Gabino Canyon Subunit Protection Recommendations	
113. Limit impacts to ridgelines to the extent feasible in order to protect coarse sediments.	Consistent. B-4 would be consistent because it proposes no development within the Middle Gabino subunit.
114. Protect a north-south habitat linkage through Middle Gabino, with particular focus on maintaining uninterrupted riparian woodland through Middle Gabino and along the western tributary into Middle Gabino.	Consistent. B-4 would be consistent because it proposes no development within the Middle Gabino subunit, including the major western tributary.
115. Protect the arroyo toad population upstream from the confluence with La Paz Creek by avoiding impacts to breeding, foraging and estivation habitat and protect canyons to avoid downstream impacts to the toad.	Consistent. B-4 would be consistent because it proposes no development in the Middle Gabino subunit.
116. Protect the diversity of raptor nesting habitat with particular focus on retaining documented nesting habitat for white-tailed kites and long-eared owls within the subunit.	Consistent. B-4 would be consistent because it proposes no development in the Middle Gabino subunit and therefore would protect raptor nesting habitat.
117. Protect the four known discrete locations of many-stemmed dudleya in the subunit that are part of a major population in a key location.	Consistent. B-4 would be consistent because it proposes no development within the Middle Gabino subunit, and therefore all dudleya populations in the subunit would be protected.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
Middle Gabino Canyon Subunit Management Recommendations	
118. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing as part of the Adaptive Management Program, and prevention of human disturbance.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
119. Pursuant to the Grazing Management Plan, implement grazing management techniques that provide for long-term protection of selected species and habitat within designated reserve areas.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program, including a Grazing Management Plan component.
120. Implement a management program for protected raptor nesting habitat in the sub-basin, including the minimization of human disturbance during the breeding season.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
Lower Gabino Subunit including Blind Subunit Protection Recommendations	
121. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Consistent. B-4 would be consistent because it would avoid direct impacts to Gabino Creek and provide for setbacks from the creek to provide adequate adjacent alluvial terraces to support arroyo toad estivation. Development in the Blind Canyon portion of the sub-basin would be limited to the area below the ridgeline separating Gabino and Blind canyons. B-4 would require construction of a two-lane collector road with a substantial bridge span over the creek that would have to be designed and constructed to avoid arroyo toad breeding habitat and streamcourse morphology.
122. Protect riparian habitat for nesting yellow-breasted chat within the subunit.	Consistent. B-4 would be consistent because it would avoid impacts to riparian nesting habitat for the chat within the Lower Gabino subunit subunit and the Blind Canyon portion supports limited chat habitat.
123. Minimize impacts to California gnatcatcher locations.	Could be consistent. B-4 could be consistent through achieving performance criteria for avoidance of all five gnatcatcher locations.
124. Minimize impacts to cactus wren locations.	Not consistent. B-4 would not be consistent because proposed development would impact 42% of the cactus wren locations.
125. Minimize impacts to native grasslands within the subunit	Could be consistent. B-4 could be consistent because proposed development includes golf course and low density residential estates, thus allowing for the opportunity to avoid, minimize, and restore native grasslands.
126. Protect breeding habitat, and to the extent feasible, protect raptor foraging habitat for resident and wintering species.	Not consistent. B-4 would not be consistent because although raptor breeding habitat in the Gabino Canyon portion of the subunit would be avoided, breeding habitat in the Blind Canyon portion and foraging areas, and particularly grasslands, are proposed for development.
127. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. B-4 would be consistent because it would avoid Gabino Creek to the confluence with Cristianitos Creek, maintaining an east-west habitat linkage to the Conservancy.
128. Protect approximately 80 percent of the discrete many-stemmed dudleya locations in Lower Gabino and Blind Canyons such that the integrity of the major population in this area (i.e., the combined Cristianitos and Gabino and Blind Canyons) is preserved.	Not consistent. B-4 would not be consistent because 67% of locations would be protected. However, 81% of individuals of many-stemmed dudleya would be protected under B-4.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
129. Protect the two known locations of intermediate mariposa lily in Lower Gabino Canyon.	N/A
130. Protect the major population of brodiaea in a key location bordering the Lower Gabino Canyon sub-unit and Cristianitos Canyon sub-basin supporting approximately 4,500 flowering stalks of thread-leaved brodiaea in three locations on the hill outcrop adjacent to and east of the clay mine pits in the southern portion of Cristianitos Canyon and in the western portion of the Gabino subunit.	Could be consistent. B-4 could be consistent by incorporating project design features that would achieve avoidance of the three locations.
Lower Gabino Subunit including Blind Subunit Management Recommendations	
131. Implement a management program for protected sensitive plant locations in the sub-basin, including control of non-native invasive species, management of grazing and minimization of human access and disturbance as part of the Adaptive Management Program.	Consistent. B-4 would be consistent because it proposes implementation of an Adaptive Management Program which includes an Invasive Species Control Plan and a Grazing Management Plan. In addition, access policies will be implemented to control human disturbances, as described in Chapter 9.
132. Protect the integrity of the arroyo toad population in Lower Gabino and Cristianitos creeks, as well as San Mateo Creek, by maintaining hydrologic and sediment delivery processes, including maintaining the flow characteristics of episodic events in the sub-basin.	Consistent. B-4 would be consistent because it would avoid Lower Gabino Creek, lower Cristianitos Creek and San Mateo Creek, thereby protecting the toad population. Hydrologic and sediment delivery processes would be maintained by implementation of the comprehensive of water quality management. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9. The protection of Upper and Middle Gabino and La Paz canyons also would be key in protecting hydrologic and seditment delivery processes. Finally, hydrology and sediment transport would be improved through invasive species control.
133. Implement an invasive plant species control effort in Cristianitos Creek between Gabino Creek and Talega Creek.	Consistent. B-4 would be consistent because it proposes an Invasive Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.
Lower Gabino Subunit including Blind Subunit Restoration Recommendations	
134. Implement a VGL restoration and enhancement program, which will likely include grazing grassland restoration techniques set forth in the Grazing Management Plan.	Not consistent. B-4 would not be consistent because proposed development in the Blind Canyon portion of the subunit would preclude implementation of the Habitat Restoration Plan and Grazing Management Plan components of the Adaptive Management Program in the subunit.
La Paz Canyon Sub-Basin Protection Recommendations	
135. Maintain a habitat linkage along La Paz Canyon to convey movement and dispersal by mountain lion, bobcat, coyote and mule deer.	Consistent. B-4 would be consistent by incorporating siting and design guidelines for the four proposed estate lots in the northmost part of the sub-basin that would occupy a very small percentage of the 1,589-acre La Paz sub-basin. Because the estate lots would occupy such a small percentage of the sub-basin, the function of the habitat linkage would be maintained.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
136. Maintain contiguity and connectivity of coastal sage scrub to provide dispersal habitat for the cactus wren and other sensitive coastal sage scrub species.	Consistent. B-4 would be consistent by incorporating siting and design guidelines for the four proposed estate lots in the northmost part of the sub-basin that would occupy a very small percentage of the 1,589-acre La Paz sub-basin. Because the estate lots would occupy such a small percentage of the sub-basin, contiguity and connectivity of coastal sage scrub to provide dispersal habitat for the cactus wren and other sensitive coastal sage scrub species would be maintained.
137. Maintain riparian habitat supporting nesting raptors.	Consistent. B-4 would be consistent because riparian nesting habitat in La Paz sub-basin would be maintained.
138. Protect alluvial fan scrub and hydrological conditions that support this plant community.	Consistent. B-4 would be consistent because alluvial fan scrub and hydrological conditions that support this plant community would be maintained.
139. Protect the locations of many-stemmed dudleya in the upper portion of the sub-basin.	Could be consistent. B-4 could be consistent by siting the four estate lots such that both locations of many-stemmed dudleya would be avoided.
140. Protect the two discrete locations of intermediate mariposa lily in the middle portion of the sub-basin.	N/A
141. Protect the integrity of arroyo toad populations in Lower Gabino Creek, as well as downstream populations in Cristianitos and San Mateo creeks, by protecting the generation and transport of coarse sediments to downstream areas.	Could be consistent. B-4 could be consistent by siting and construction of estate lots according to guidelines to ensure that the generation and transport of coarse sediments to downstream areas would be protected.
Talega Canyon Sub-Basin Protection Recommendations	
142. Protect the integrity of arroyo toad populations in Talega Canyon by maintaining current stormwater runoff patterns and hydrologic conditions.	Consistent. B-4 would be consistent because it would avoid Talega Creek, thereby protecting the arroyo toad population. Hydrologic and sediment delivery processes would be maintained by implementation of the water quality management. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9.
143. Provide for comprehensive water quality treatment consistent with protection of arroyo toads in Talega Creek.	Consistent. B-4 would be consistent because water quality would be maintained by implementation of the Water Quality Management Plan. Management of water quality would occur in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. Water quality would be adaptively managed by the development entities as described in Chapter 9.
144. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Consistent. B-4 would be consistent because it would avoid direct impacts to Talega Creek and would include minimum setbacks of approximately 80 feet in elevation above the creek to provide for adequate upland habitat for lateral movement within adjacent alluvial terraces. Development would be concentrated on the clay soils that are less suitable habitat for the toad.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
145. Protect raptor nesting locations in the sub-basin, with particular attention to nesting of white-tailed kite and long-eared owl within the sub-basin. (Note that one long-eared owl and three white-tailed kite historic nest sites are located in Talega Creek just south of the RMV boundary.)	Consistent. B-4 would be consistent because one long-eared owl and three white-tailed kite historic nesting locations, as well as other raptor nest sites, associated with Talega Creek riparian habitat would be protected under B-4.
146. Maintain an east-west habitat linkage for gnatcatcher and cactus wren to protected habitat in the Talega and Forster Ranch Planned Communities.	Consistent. B-4 would be consistent because it would avoid habitat linkage Q along Talega Canyon.
147. Maintain an east-west habitat linkage for large mammals along Talega Creek with sufficient width at confluence with Cristianitos Creek and along south-facing slope.	Consistent. B-4 would be consistent because it would avoid habitat linkage Q along Talega Canyon.
148. Protect the four known locations of thread-leaved brodiaea east of the Northrup Gruman facilities that constitute an important population	Could be consistent. B-4 could be consistent because careful siting of estate lots would avoid impacts to the four brodiaea locations.
149. Protect eight locations of many-stemmed dudleya east of the Northrup Gruman facilities that may constitute an important population.	Could be consistent. B-4 could be consistent because careful siting of estate lots would avoid impacts to the three dudleya locations in this important population that are within the designated estate lot area. The other five locations fall outside the designated estate lot area.
Other Planning Area Protection Recommendations	
150. Protect a habitat linkage, consisting of the Donna O'Neill Land Conservancy and an area along the east side of Cristianitos Creek, to provide connectivity for gnatcatchers in the upper portion of the sub-basin with other populations in Lower Gabino Creek and Camp Pendleton along lower Cristianitos/San Mateo Creek, and to maintain habitat integrity through connectivity within the Donna O'Neill Land Conservancy at Rancho Mission Viejo.	Consistent. B-4 would be consistent because it would provide for a habitat linkage (N) along Cristianitos Creek and the O'Neill Conservancy by providing a setback from Cristianitos Creek for development in the Cristianitos and Talega sub-basins.
151. Protect the majority of native grasslands in the area.	Not consistent. B-4 would not be consistent because it would impact 84% of native grassland in the sub-basin.
152. Protect the integrity of arroyo toad populations in lower Cristianitos Creek by maintaining current hydrologic conditions.	Consistent. B-4 would be consistent because hydrologic and sediment delivery processes would be maintained by addressing "hydrologic conditions of concern" in compliance with the County of Orange MS4 permit issued by the San Diego Regional Water Quality Control Board through implementation of a Water Quality Management Plan. "Hydrologic conditions of concern" would be adaptively managed by the development entities as described in Chapter 9.
153. Protect breeding and foraging habitat and movement opportunities within the streamcourse and adjacent alluvial terraces for the arroyo toad. Address potential upland estivation habitat needs in the context of best scientific information regarding the influence of topography, soils and other factors that appear to influence arroyo toad lateral movement and frequency of use in upland areas away from streamcourse habitat areas.	Consistent. B-4 would be consistent because it would avoid direct impacts to lower Cristianitos Creek and Talega Creek and would include setbacks at a minimum of 80 feet above the creek to provide for adequate upland habitat for lateral movement within adjacent alluvial terraces.
154. Protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat, and yellow warbler along lower Cristianitos Creek.	Consistent. B-4 would be consistent because it would avoid impacts to lower Cristianitos Creek and adjacent uplands and thus protect breeding and foraging habitat for the least Bell's vireo, yellow-breasted chat, and yellow warbler.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
155. Protect breeding habitat and to the extent feasible foraging habitat for resident and wintering raptor species.	Not consistent. B-4 would not be consistent because although it would avoid impacts to lower Cristianitos Creek, a substantial area of adjacent grasslands would be impacted.
156. Maintain a north-south habitat linkage along Cristianitos Creek between San Juan Creek and lower San Mateo Creek for gnatcatchers and other avian species, as well as large mammals such as mountain lion, bobcat, coyote, and mule deer.	Consistent. B-4 would be consistent because it would provide for a habitat linkage (N) along Cristianitos Creek and the O'Neill Conservancy by providing setbacks from Cristianitos Creek associated with development in this sub-basin, as well as the Cristianitos and Talega sub-basins.
157. Maintain an east-west habitat linkage from Gabino Creek to the confluence with Cristianitos Creek for wildlife movement between Gabino Canyon and the Donna O'Neill Conservancy at Rancho Mission Viejo.	Consistent. B-4 would be consistent because it proposes a setback between development and the confluence of Cristianitos and Gabino creeks, thus maintaining an east-west habitat linkage (O) to the Conservancy.
Other Planning Area Management Recommendations	
158. In conjunction with upstream and adjacent control efforts, implement an invasive plant species control program.	Consistent. B-4 would be consistent because it would include an Invasive Plant Species Control Plan component of the Adaptive Management Program which addresses species of concern in the sub-basin such as tamarisk and pampas grass.
PLANNING AREA-WIDE SPECIES CONSIDERATIONS	
Golden Eagle Protection Recommendations	
159. Protect foraging habitat for the golden eagle to the extent feasible in the Chiquita, Gobernadora, Upper Gabino, Cristianitos and Talega sub-basins. (Note: As described in the NCCP Planning Guidelines, "Golden eagles are an uncommon resident in the subregion. They are known to nest in the Cleveland National Forest, and although not known to nest in the study area, they occasionally forage in grasslands and agricultural areas throughout much of RMV, but especially in grasslands and agricultural areas in the Chiquita, Gobernadora, upper Gabino, Cristianitos, and Talega sub-basins.")	Consistent. B-4 would be consistent with this recommendation. Under B-4, potential golden eagle foraging habitat in the Chiquita, Gobernadora, Cristianitos, and Talega sub-basins would be impacted. However, within the context of occasional use of RMV for foraging, the golden eagle likely would continue to forage in the planning area under the B-4 alternative in areas such as Upper Gabino Canyon and Upper Chiquita Canyon.
Mountain Lion Protection Recommendations	
160. Protect "live-in" habitat within the RMV portion of the San Mateo Creek Watershed and Verdugo Canyon in the San Juan Creek Watershed adequate to meet the life history requirements of the mountain lion, comprising a large, unfragmented block of chaparral and coastal sage scrub directly connected to more than 100,000 acres in Cas pers Wilderness Park, the Cleveland National Forest, and Camp Pendleton.	Consistent. B-4 would be consistent because it would provide for a large habitat block consisting of Verdugo Canyon, upper and Middle Gabino, and La Paz canyons, and the eastern Talega sub-basin, which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton. The proposed golf course and estates in Upper Gabino may locally affect behavior but with the extensive open space overall in the Habitat Reserve and CNF, the overall impact would not be significant.

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
<p>161. Maintain habitat connections throughout the planning area to provide movement opportunities for the mountain lion. As described above for individual sub-basins, as well as other areas in the planning area, important movement areas for mountain lion include Arroyo Trabuco, the Foothill-Trabuco Specific Plan Area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, Trampas Canyon, Cristianitos Canyon, Verdugo Canyon, Gabino Canyon, La Paz Canyon, and Talega Canyon.</p>	<p>See individual sub-basins for consistency.</p>
Mountain Lion Management Recommendations	
<p>162. In areas identified as “live-in” habitat or habitat connections for mountain lion, roads that are necessary to serve approved land and water uses located inside or outside the Habitat Reserve shall be designed and sited to accommodate mountain lion movement to the maximum extent feasible. Where roads are necessary, under the approved NCCP/HCP, they will be designed consistent with safety, roadway design criteria that are appropriate for the setting and desired roadway function. Roadway design shall include bridges and/or culverts large enough to accommodate mountain lion movement at key areas and, where appropriate and feasible, may include wildlife over crossings . As appropriate, fencing, grading and plant cover will be provided to serve wildlife crossings consistent with conservation principles and the Adaptive Management Program . Where feasible and safe, lighting along roadways within the Habitat Reserve should be avoided. Where roadway lighting within the Habitat Reserve is necessary for public safety reasons, it should be low-sodium or similar low intensity lighting that is directed away or shielded from the Habitat Reserve.</p>	<p>Consistent. B-4 would be consistent because roads constructed as part B-4 would comply with the recommendation regarding siting, wildlife movement, bridges and culverts, and lighting.</p>
Mule Deer Protection Recommendations	
<p>163. Protect “live-in” habitat within the portion of the San Mateo Creek Watershed in the planning area adequate to meet the life history requirements of the mule deer, comprising a large, unfragmented block of chaparral and coastal sage scrub directly connected to Caspers Wilderness Park, the Cleveland National Forest, and Camp Pendleton.</p>	<p>Consistent. B-4 would be consistent because it would provide for a large habitat block consisting of the upper and Middle Gabino and La Paz sub-basin and the eastern Talega sub-basin which would link to Caspers Wilderness Park, the CNF, and Camp Pendleton. The proposed golf course and estates in Upper Gabino may somewhat affect the mule deer’s use of this area and bring them into greater contact with humans (e.g., vehicle collisions), but this impact likely would not be significant because of the deer’s tolerance for human presence.</p>
<p>164. Protect “live-in” habitat within the San Juan Creek Watershed in the planning area adequate to meet the life history requirements of the mule deer, including Chiquita Ridge, Chiquadora Ridge, the ridgeline separating the Chiquita and Wagon Wheel sub-basins, and the ridgeline separating the Gobernadora and Bell Canyon sub-basins that directly connects to Caspers Wilderness Park and Audubon Starr Ranch Sanctuary.</p>	<p>See individual sub-basins for consistency.</p>

**APPENDIX G-5 (Continued)
SOUTHERN NCCP/HCP PLANNING GUIDELINES CONSISTENCY FINDINGS**

PLANNING GUIDELINE	PROPOSED PROJECT (B-4)
<p>165. Maintain habitat connections throughout the planning area to provide movement opportunities for the mule deer. As described above for individual sub-basins, as well as other areas in the planning area, important movement areas for mule deer include Arroyo Trabuco, the Foothill-Trabuco Specific Plan Area, Chiquita Ridge, Sulphur Canyon, San Juan Creek, Trampas Canyon, Cristianitos Canyon, Verdugo Canyon, Gabino Canyon, La Paz Canyon, and Talega Canyon.</p>	<p>Consistent. See individual sub-basins for specific consistency determinations for this recommendation. In addition, the Arroyo Trabuco would be protected under B-4. As a designated Existing Use area, habitat connections in the Foothill-Trabuco Specific Plan Area will be determined through the environmental review and permitting process for projects in the Specific Plan area.</p>
<p>Mule Deer Management Recommendations</p>	
<p>166. In areas identified as “live-in” habitat or habitat connections, roads that are necessary to serve approved land and water uses located inside or outside the Habitat Reserve shall be designed and sited to accommodate mule deer movement to the maximum extent feasible. Where roads are necessary, under the approved NCCP/HCP, they will be designed consistent with safety, roadway design criteria that are appropriate for the setting and desired roadway function. Roadway design shall include bridges and/or culverts large enough to accommodate mule deer movement at key areas and, where appropriate and feasible, may include wildlife over crossings. (Note: of the large mammal species, mule deer are the most sensitive to bridge and culvert design. Designs that accommodate mule deer are generally suitable for mountain lion, bobcat, and coyote.) As appropriate, fencing, grading, and plant cover will be provided to serve wildlife crossings consistent with conservation principles and the Adaptive Management Program. Where feasible and safe, lighting along roadways within the Habitat Reserve should be avoided. Where roadway lighting within the Habitat Reserve is necessary for public safety reasons, it should be low-sodium or similar low intensity lighting that is directed away or shielded from the Habitat Reserve.</p>	<p>Consistent. B-4 would be consistent because roads constructed as part B-4 would comply with the recommendation regarding siting, wildlife movement bridges and culverts, and lighting.</p>