



**County of San Diego, Planning & Development Services**  
**Project Planning Division**

---

To: Emmett Aquino, Project Manager  
From:   
Maggie Loy, Biologist and EIR Coordinator  
Subject: Addendum for Nelson Grading Permit Biological Letter Report  
PDS2008-2700-15413  
Date: July 29, 2014

Wildlife Corridor Considerations

The purpose of the grading project is the placement of excess fill from an adjacent approved project. The best management practice (BMP) for placement of excess fill is to create fairly level pads and to provide erosion control. A discretionary grading permit is required for moving the material to another property. The grading permit does not allow any building construction and building is not allowed by right because the zoning of the property includes a B Designator to require a site plan review to establish compliance with the Community Design Guidelines. A site plan's approval requires subsequent CEQA environmental review.

The project site is located within a future Pre-approved Mitigation Area (PAMA) of the Draft North County Multiple Species Conservation Plan. The PAMA designation will not be in effect until the plan is approved, but these areas are considered for future preserve planning. The PAMA associated with the project is intended to preserve connectivity along Keys Creek in northern Valley Center. Habitats that would be impacted on the 8.2-acre grading footprint (project site) include Non-native Grassland (NNG), Disturbed Habitat, Urban/Developed Habitat, and Coast Live Oak Woodland (CLOW). The creek habitat trends east/west about 275 feet south of the proposed grading site. The offsite creek habitat is characterized by a corridor of mature riparian vegetation up to 300-feet wide in PAMA that is 1300 to 2000 feet wide in the vicinity of the project. Wildlife movement would be associated with Keys Creek and follow the creek's east/west direction south of the project site (refer to the attached Keys Creek figure).

The functions of the wildlife corridor would not be substantially impacted by the project because the proposed grading is positioned adjacent to and along 1,360 feet of Valley Center Road, is proportionately a narrow band of disturbance (about 250 feet wide)

running parallel to the creek so it does not interfere with ongoing wildlife movement, is at least 275 feet from the riparian habitat well outside of any wetland buffer, and in an area planned for Village development.

In the vicinity of the project, the PAMA is 1300 to 2000 feet wide. Five hundred feet west of the project, the PAMA narrows to 775 feet wide extending to the point where the creek crosses a north/south portion of Valley Center Road, where the PAMA is its narrowest at 575 feet wide (refer to the attached PAMA figure).

The project site and this portion of the PAMA has been an agricultural use area for many decades. There is existing commercial development adjacent on the west of the grading project (between the project and the creek). More intensive land uses (industrial and commercial) occurs in the vicinity to the east of the project site. To the north, the proposed grading abuts an east-west portion of Valley Center Road, which is a busy transportation corridor and the main road through the area. The project is within an area that the General Plan designates as "Village." Finally, there is a new Mobility Element (ME) Road (Miller Road) planned immediately south of the project area. In the future, implementation of County plans for the area could isolate the grading project area from the surrounding habitat.

The function of the PAMA would not be substantially impacted by the project because the disturbance would be at the northern-most edge of the PAMA planning area, where it has an adequately wide contour. Furthermore, any proposed future development of the site would be associated with existing Village designations along the main roadway.

#### Additional Survey Details

Although it is not discussed in the Nelson Pad Grading Project biology report (Scheidt, February 2014), the author had also surveyed the site on June 7, 2013, as part of another survey. The data generated (including ephemeral annuals) were incorporated into the floral checklist (Table 1) of the Nelson biology report. No special status plants were detected during that spring-time survey. While 2013 was also a dry weather year, the site conditions combined with the 2013 spring survey indicate that there are no sensitive plant species present.

#### Additional Mitigation Details

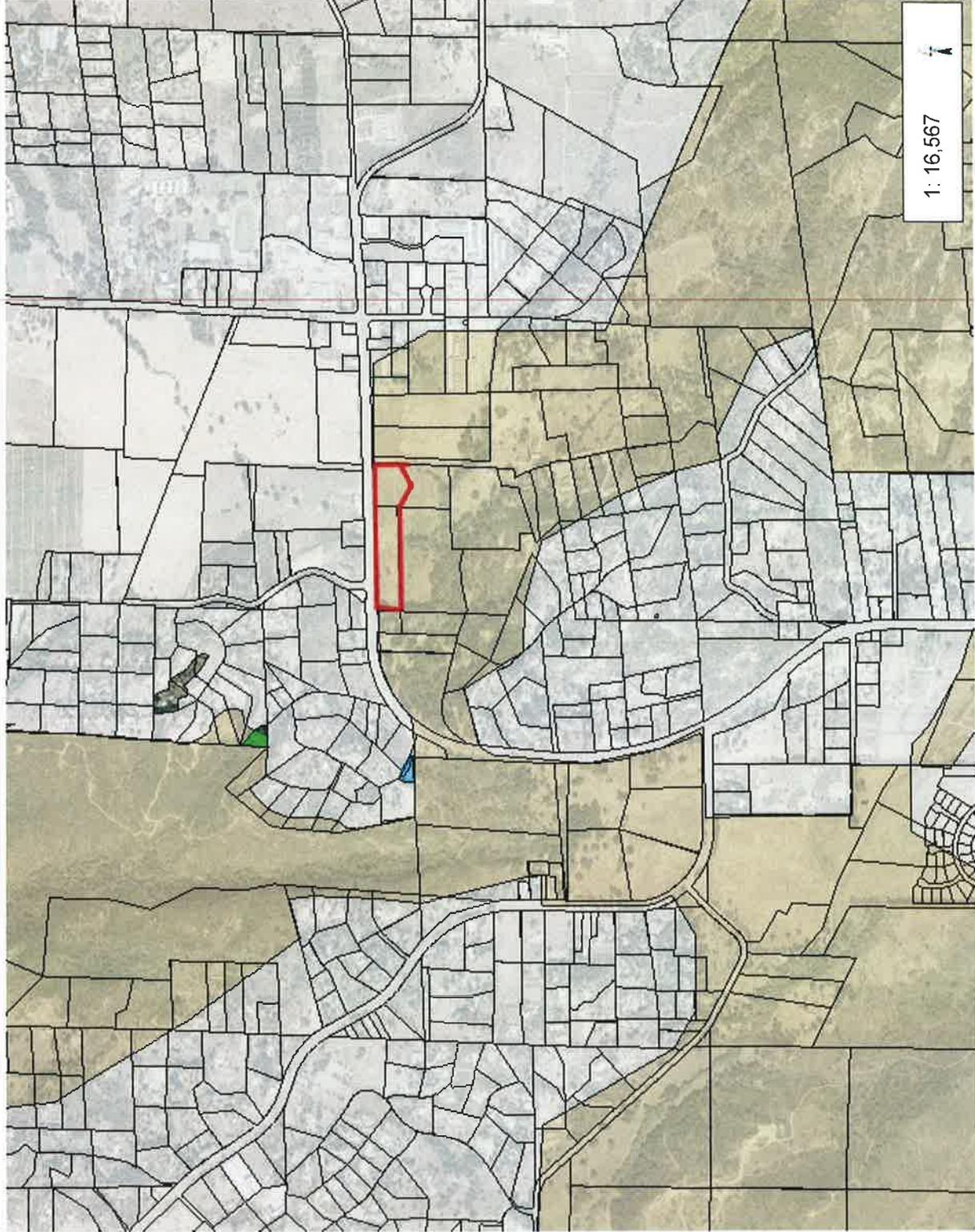
The applicants propose to identify suitable off-site mitigation, which would most likely be in an approved mitigation bank, such as the Brook Forest Conservation/Mitigation Bank currently in development. On-site habitat to mitigate impacts to NNG and CLOW is not suitable because it is constrained by the future planned ME road.

# NCMSCP PAMA - Nelson Grading



## Legend

- Parcels
- NCMSCP Designations (Draft)**
  - Preserve Areas
  - Pre-Approved Mitigation Area (PAMA)
  - Outside Pre-Approved Mitigation Area
  - Pre-negotiated (Hardlined) Take Al.
  - Special Districts
  - Tribal Lands/Out of Plan
  - US Forest Service



1: 16,567



0.5 Miles

0.26

0

0.5

NAD\_1983\_StatePlane\_California\_VI\_FIPS\_0406\_Feet  
 Planning and Development Services

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.  
 THIS MAP IS NOT TO BE USED FOR NAVIGATION

## Notes

# Keys Creek and Nelson Grading Project



### Legend

- Parcels
- Rivers

1: 6,766

### Notes

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION

0.2 Miles

0.11

0