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11 June 2013

Russell Rumansoff
530 Saint John Place
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**BIOLOGICAL RESOURCES, WETLAND SURVEY, AND HABITAT ASSESSMENT
LETTER REPORT**

**Project Name: Kahoots Retail Feed and Pet Supply Site Plan, Case Number 3500 12-020
Log No. 3910 12-09-003**

Prepared for the County of San Diego

Dear Mr. Rumansoff,

I have prepared this letter report at your request and in response to the scoping letter from County staff dated November 27, 2012.

The Kahoots Site Plan is an application for the construction of a retail pet and feed supply store on two legal parcels in the community of Ramona (APNs 282-221-05 & 06). The parcels together total 1.48 gross acres.

PROJECT LOCATION AND SETTING

The project site is situated in central San Diego County, in the community of Ramona. The parcels are situated on the southwest corner of the intersection of SR-67 and Letton Street (Figures 1 and 2). The site is essentially flat. The approximate USGS coordinates for the site are 32°02'N, 116°53'W (San Pasqual 7.5 minute series quadrangle, see Figure 3). The elevation of the site is approximately 1,400 feet ASL.

The site is bordered on north, south, and east by long-existing developed commercial and residential properties. West of the project are several similar undeveloped parcels.

METHODS

To conduct an assessment of biological resources and a Wetland Survey, I visited the project site on 7 February 2013. The conditions for observation during the visit were excellent, with no cloud cover, no impediments to visibility, temperatures in the low 60s, and 3-5 knots SW wind. The visit lasted from approximately 1230 to 1415. During my visit, I was able to examine the entire project site and adjacent areas. My observations on-site were recorded as they were made, and form the basis of this report and the project Biological Resources Map. Animals were

identified using scat, tracks, burrows, vocalizations, or by direct observation with the aid of 10X42 Leica binoculars. Vegetation mapping was conducted in accordance with vegetation community definitions as described in Holland (1986) and Oberbauer (1996). In addition, vegetation mapping on-site was aided by the use of a digital color satellite photograph.

The Wetland Survey and Habitat Assessment were also conducted during the 7 February site visit. Survey methods were based on the County Resource Protection Ordinance (RPO) wetland definition and additionally generally followed the protocol as set forth by the 1987 Army Corps of Engineers Wetland Delineation Manual (Wetland Training Institute 1995). The USGS 7.5 minute topographical map for the area was also reviewed for wetland indicators.

Sensitive Species and Habitats

Prior to the initial visit, a variety of sources were reviewed to ascertain the potential occurrence of sensitive species at the project site. First, soil types (Bowman 1973) were checked to determine if the site contains soils known to support sensitive plant species. Records searches for the USGS quadrangle and surrounding quads were done of the California Natural Diversity Data Base (CNDDDB) and California Native Plant Society (CNPS) On-Line Inventory of Rare and Endangered Plants. Any sensitive species known to occur in the vicinity were given special attention, and available natural history information was reviewed. Seasonal occurrence patterns (*e.g.*, annual plants, migratory birds) were factored into survey plans in the event that site visits were made during time periods when certain sensitive species are not present or conspicuous. Information sources include the Jepson Manual (1993), Rare Plants of San Diego (Reiser 1994), A Flora of San Diego County, California (Beauchamp 1986), San Diego Native Plants (Lightner 2011), U.S. Fish and Wildlife Service Recovery Plans for Threatened/Endangered Species, [especially the Vernal Pools of Southern California Recovery Plan (USF&WS 1998) and the Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon - USF&WS (2005)], the San Diego County Bird Atlas (Unitt 2004), and numerous other references, publications, and on-line resources.

A list of sensitive species with potential to occur at the site was reviewed prior to field work (See Appendix D). All species on the list were reviewed, and those species requiring directed surveys were noted and given appropriate attention.

In the field, potentially sensitive plants species not readily identified *in situ* were photographed and/or collected for identification via keys or other methods. During site visits, all habitats were assessed for their suitability for occupation by any sensitive species with potential to occur.

In addition, areas nearby with known vernal pools were visited to assure that timing of the Habitat Assessment was appropriate and sufficient water had accumulated in the area such that detection and assessment of vernal pools for San Diego Fairy Shrimp *Branchinecta sandiegoensis* and other vernal pool species would be reliable. In 1992 Ramona Biologist Fred Sproul conducted a detailed survey for vernal pools and vernal pool species in the Ramona area. His findings constitute the greatest body of information for the Ramona area in the CNDDDB. His information was relied on for portions of this report.

RESULTS¹

Soils

Based on soil conservation service maps (Bowman 1973 - Figure 4), the soil type for the project site is Placentia sandy loam, 5 to 9% slopes, eroded. Although a detailed soil analysis is beyond the scope of this report, on-site examination appeared to verify this principal soil type. It does appear that some non-native soil has been imported into the site.

Habitats / Vegetation Communities (See Biological Resources Map)

Note: The only native plants species detected on the site were salt grass *Distichlis spicata* and a single western cottonwood *Populus fremontii* tree. The entire site is essentially ruderal.

Non-Native Grassland - Holland Code 42200 (1.17 acres)

Most of the project site is covered with this vegetation community. It is dominated by herbaceous weeds such as mustard *Brassica nigra*, horseweed *Conyza canadensis*, filaree *Erodium sp.*, *cicutarium*, and non-native grasses (e.g., *Avena* and *Bromus ssp.*).

Eucalyptus Woodland - Holland Code 79100 (0.08 acres)

Along SR-67 are large, old eucalyptus trees. Although the mature trees are situated in the right-of-way, their canopies extend into the project site. In addition, a small number of very small trees have established in the northeast corner of the project site. Falling leaves from eucalyptus trees are alleopathic, *i.e.*, extremely toxic and preclude other plant species from becoming established.

Disturbed - Holland Code 11300 (0.23 acres)

An area in the northwest corner of the project site appears to have had soil imported in the past, and is hard packed. The hard packing, along with eucalyptus litter, likely result in the absence of vegetation in this area.

Wildlife

During the site survey a small variety of common resident bird species were observed. These included Anna's Hummingbird *Calypte anna*, House Finch *Carpodacus mexicanus*, Starling *Sturnus vulgaris*, and American Crow *Corvus brachyrhynchos*. A Red-tailed Hawk *Buteo jamaicensis* was seen flying over the site.

¹ Scientific and common names for plant species are derived from The Jepson Manual, 1993; scientific and common names for birds from the A.O.U. Check-list of North American Birds, 1998.

Mammals recorded from the site include California Ground Squirrel *Spermophilus beecheyi* and Botta's Pocket Gopher *Thomomys bottae*. No reptiles or amphibians were observed.

The lack of native vegetation, and the highly disturbed and urban nature of the setting likely contributes to the general absence of non-urban animal species. A complete list of animal species detected on the site is provided in Appendix B.

Special Status Species

Directed surveys and habitat assessments for species with potential to occur (Appendix D) were conducted. The site lacks appropriate habitat for many sensitive species. However, one sensitive species has a moderate potential for occurrence:

Cooper's Hawks *Accipiter cooperi*, a state species of special concern, often forage in search of small birds over a variety of habitats. This urban-adapted species also occurs in oak woodlands and developed/residential areas. They are a common resident and migratory species in San Diego County. Although this species has apparently declined throughout much of California, there is no evidence for a breeding population decline in San Diego County. This species is not included in the U.S. Fish and Wildlife Service's comprehensive list of Birds of Conservation Concern for the Southern California Bird Conservation Region (USFWS 2002). No Cooper's Hawks were seen during the site surveys, but their occurrence would not be surprising. The project would not adversely affect the species' preferred habitat, thus no impacts are expected.

VERNAL POOL SURVEY AND SAN DIEGO FAIRY SHRIMP HABITAT ASSESSMENT

Vernal pools are temporary, undrained pools of water. Most pools are dry for at least part of the year and fill with the winter rains. Some pools may remain at least partially filled with water over the course of a year or more, but all vernal pools dry up periodically. They are called vernal pools because they are often, but not necessarily, at their peak depth in the Spring. Despite being dry at times, once filled they teem with life.

The underlying soils of the vernal pool are a fundamental part of vernal pool habitat. These soils are often referred to as hydric. In most cases there is also a shallow, underlying hard pan layer which causes the retention of water in the pools. The entire process of normal soil turning into hydric soil is often referred to as "base retention".

Vernal pools are home to many endemic species because of the unique environmental niches created by specific acidity and salinity gradients. Different species are suited to different moisture levels, and as water evaporates from the edges of a pool, rings of flowers blossom around it. The color patterns change as the season wears on. The rings may form swirls and layers, with the green of new grass surrounding the whole pattern.

A large number of rare, endangered and endemic species occur in vernal pool areas. For example, the San Diego mesa mint *Pogogyne abramsii*, a highly endangered plant, is found exclusively in vernal pools in the coastal San Diego area. Other sensitive vernal pool plants include (but are not limited to) San Diego thornmint *Acanthomintha ilicifolia*, Orcutt's brodiaea *Brodiaea orcutti*, and San Diego goldenstar *Muilla clevelandii*. San Diego Fairy Shrimp is an endangered invertebrate that occurs only in San Diego County vernal pools.

In Ramona there are at least five significant vernal pool complexes. The main complexes are in the area known as the Ramona Grasslands, which is generally south and west of the Ramona Airport. In the Grasslands, the vernal pools are of high quality, with typical annual flower rings and they are home to a large number of sensitive and endangered plant and animal species. The other three, much smaller, vernal pool complexes are located in the highly developed portion of urban Ramona. Pools in these areas are generally highly disturbed, with the only sensitive vernal pool species having been detected being the San Diego Fairy Shrimp and one pool containing San Diego thornmint.

As noted above, much of the mapping of vernal pools in Ramona was conducted in the early 1990s by Biologist Fred Sproul. I attempted to locate the urban pools for comparative purposes. Of these urban pools (north and west of the project site) only one pool was intact. Several of the mapped pools are on parcels that have been developed with single family homes, and no traces of them exist. Others appeared to be mowed several times a year for fuel abatement purposes. In these areas it appears that tractor tires have destroyed the pools. At some sites the pools are not simply detectable. The nearest apparently intact pool is located five blocks west of the project site at the corner of Kelly and Wynola Streets. The urban pools are mostly located within residential areas which have no paved roads. It is interesting to note that many of the dirt roads contain large pools of standing water which are regularly traversed by traffic. These standing pools of water led me to believe that sufficient winter rainfall had occurred such that existing vernal pools would be easily located.

In 2007 the USF&WS designated Critical Habitat for the San Diego Fairy Shrimp (Federal Register Vol. 72, No 238, pp. 70648-70714). The closest Critical Habitat to the project site is in Subunit 3E.3, which is located north and west of the project site.

The Sproul surveys were extensive and covered virtually all vacant, accessible land in the Ramona area. He certainly surveyed the project site and adjacent parcels, with negative findings. As noted below in the Wetland Survey portion of this report, a man-made drainage ditch passes through the southern portion of the project site and on to the parcels west of the project site. The ditch transports urban runoff, including irrigation from abundant nearby landscaping. This irrigation runoff is from local groundwater known to have high concentrations of total dissolved solids, including nitrates and salts which negatively effect typical vernal pool acidity and salinity. These compounds can be toxic to sensitive vernal pool species. This, and the fact that there is no significant ponding of water on the project site, are likely reasons for the total lack of any native species in the drainage, let alone vernal pool species.

The project site and parcel to the west were carefully surveyed and no vernal pools or vernal pool species were detected.

Large mammals, such as Mule Deer and Mountain Lion prefer large unfragmented natural areas that offer extensive forage or hunting opportunities as well as the opportunity for movement across long distances. The project site is surrounded by busy roadways and urban development not suitable for use by large mammals. Significant impacts to large mammals are not anticipated.

Raptor Habitat. The Non-Native Grassland on the project site likely serves occasionally as raptor foraging habitat. Some of the trees near the site may provide **foraging** and **nesting habitat** for raptors such as Red-tailed Hawks and Cooper's Hawks. The project does not propose removal of large eucalyptus trees, thus, potential nesting sites would not be impacted. Given the nearby expansive Ramona Grasslands and Cleveland National Forest, the removal of this small area of Non-Native Grassland would not significantly affect raptor foraging habitat.

Wildlife Movement Corridors and Nursery Sites

A wildlife corridor can be defined as a linear landscape feature allowing animal movement between two larger patches of habitat. Connections between extensive areas of open space are integral to maintain regional biodiversity and population viability. In the absence of corridors, habitats become isolated islands surrounded by development. Fragmented habitats support significantly lower numbers of species and increase the likelihood of local extinction for some species when they are restricted to small isolated areas of habitat. Areas that serve as wildlife movement corridors are considered biologically sensitive.

Wildlife corridors can be defined in two categories: regional corridors and local corridors. Regional corridors link large areas of undeveloped land and serve to maintain genetic diversity among wide-ranging populations. Local corridors permit movement between smaller patches of habitat. These linkages effectively allow a series of small, connected patches to function as a larger block of habitat and perhaps result in the occurrence of higher species diversity or numbers of individuals than would otherwise occur in isolation. Target species for wildlife corridor assessment typically include species such as Bobcat, Mountain Lion, and Mule Deer.

To assess the function and value of a particular site as a wildlife corridor, it is necessary to determine what areas of larger habitats it connects, and to examine the quality of the corridor as it passes through a variety of settings. High quality corridors connect extensive areas of native habitat, and are not degraded to the point where free movement of wildlife is significantly constrained. Typically, high quality corridors consist of an unbroken stretch of undisturbed native habitat.

The project site is isolated in a highly urbanized setting, with numerous roadways and streets, and no apparent connectivity with larger patches of undisturbed habitat. It is surrounded on three sides by existing development. Thus, the project site does not serve as a wildlife movement corridor.

Native Wildlife Nursery Sites, which are considered sensitive resources that require protection, are defined in the County of San Diego Guidelines for Determining Significance - Biological Resources as “sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies”. Features such as individual raptor or woodrat nests do not constitute places where wildlife *concentrate*, thus they do not meet this definition and are therefore not considered Native Wildlife Nursery Sites. No Native Wildlife Nursery Sites occur on the site or will be impacted by project implementation.

WETLAND SURVEY

Pursuant to the November 27, 2012 scoping letter a Wetland Survey of the project site was conducted to determine if any features on the site meet the definition of wetlands under the RPO or other jurisdictional agencies. The RPO [§ 86.602 (m)] notes that “Riparian Habitat is characterized by plant and animal communities which require high soil moisture conditions maintained by transported freshwater in excess of that otherwise available through local precipitation.” The RPO [§ 86.602 (q)(1)] further defines wetlands;

Lands having one or more of the following attributes are “wetlands”:

- (aa). At least periodically, the land supports predominantly hydrophytes (plants whose habitat is water or very wet places);
- (bb). The substratum is predominantly undrained hydric soil; or
- (cc). An ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

The RPO [§ 86.602 (q)(2)] goes on to state:

“Notwithstanding paragraph (1) above, the following shall not be considered “Wetlands”:

- (aa) Lands which have attribute(s) specified in paragraph (1) solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:
 - (i) Have negligible biological function or value as wetlands;
 - (ii) Are small and geographically isolated from other wetland systems;
 - (iii) Are not vernal pools; and,
 - (iv) Do not have substantial or locally important populations of wetland dependent sensitive species.

It should also be noted that the County’s definition of wetlands varies from the U.S. Army Corps of Engineers’ (ACOE) definition. The ACOE frequently requires that formal or informal wetland delineations be conducted under guidelines set forth in the 1987 Corps of

Engineers Wetland Delineation Manual. The ACOE defines a wetland as “an area... inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” Typically, ACOE wetlands are characterized by the presence of hydrophytic vegetation, hydric soils, and wetland hydrology.

The Wetland Survey took place within a few days of significant rainfall throughout San Diego County. Along the southern property boundary is a man-made shallow drainage ditch that channels urban runoff from the east to the west (Photographs 4, 5, and 6). The ditch is overgrown with non-native grasses and supports no hydrophytes. Although some of the soil adjoining the ditch was saturated, this is to be expected after such significant rains. It is also clear that the saturated soil drains slowly as part of the overall drainage system in the area. This man-made drainage system parallels Kelly Street for at least one block east and five blocks west of the project site. Sometimes the drainage ditch is above ground, and at other places it passes underground through a culvert system (Figure 7).

There are no plant or animal species or communities on the project site which require high soil moisture content. There is no evidence (other than irrigation runoff) that there is ever the presence of fresh water in excess of that provided by local precipitation. In the complete absence of hydrophytic vegetation and evidence of hydrology, there are no wetlands or other indications (*e.g.*, Ordinary High Water Marks) suggesting that jurisdictional waters of any kind occur on the property. There is no ephemeral or perennial stream present whose substratum is predominately non-soil. The area in question does not contribute substantially to the biological functions or values of wetlands in the drainage system. The site does not contain RPO wetlands.

It should be noted that approximately 100 feet west of the project site within the drainage system is a small area (approximately 10' by 30') that does support curly dock *Rumex crispus*, which is an introduced hydrophytic weed that is often found in saturated soils. It is likely that this area supports such vegetation due to the very level topography and the slow rate at which the saturated soil drains to the west. This area lacks any plant or animal vernal pool indicator species, and is not a vernal pool.

SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

The California Environmental Quality Act (CEQA) requires that projects avoid or adequately mitigate for the loss of sensitive species and habitats. Such avoidance or mitigation enables County staff to make a finding that all project impacts are below or will be reduced to a level below significant and to issue a Negative Declaration or Mitigated Negative Declaration for the proposed project.

Direct Impacts

Direct impacts occur when biological resources are altered or destroyed during the course of, or as a result of, project implementation. Examples of such impacts include removal or grading of vegetation, filling wetland habitats, or severing or physically restricting the width of wildlife corridors. Other direct impacts may include loss of foraging or nesting habitat and loss

of individual species as a result of habitat clearing. Permanent impacts may result in irreversible damage to biological resources. Temporary impacts are interim changes in the local environment due to construction and would not extend beyond project-associated construction. Direct impacts of this project will result in the loss of Non-Native Grassland.

Indirect Impacts

There is the potential for indirect impacts to occur as a result of implementation of the proposed project. The areas where indirect impacts have the potential to occur could extend from the development areas into sensitive habitat due to such activities as excessive landscape irrigation, vegetation trampling outside developed areas, and introduction of non-native species (*e.g.*, argentine ants, cats, non-native invasive plant species). These indirect impacts are referred to as “edge effects.” There is the potential for indirect impacts on animals as a result of an increase in noise, dust, and light during permitted activities and from vehicle use. These indirect impacts are considered unavoidable due to the nature of the project, existing uses on-site, and existing surrounding land uses.

Indirect impacts from edge effects are considered adverse, but not significant, because substantial existing edge effects and disturbance are already impacting the site. Additional effects, if any, would be incremental and less than significant.

Cumulative Impacts

Cumulative impacts consider the potential regional effects of a project and how a project may affect an ecosystem or one of its sensitive components beyond the project limits and on a regional scale. Section 15064 of the State CEQA Guidelines governs the determination of significant environmental impacts caused by a project. The evaluation of a project’s cumulative impacts is discussed in Section 15064(h) of the CEQA Guidelines. Cumulative impacts must be discussed when project impacts, although individually limited, may be cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects affecting the same resource (CEQA Guidelines §15064(h)(1)).

A lead agency may determine in an initial study that “a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant”. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than “cumulatively considerable” (CEQA Guidelines §15064(h)(2)). The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable (CEQA Guidelines §15064 (h)(4)).

Based on County policy and practice, in the absence of adequate mitigation, the Kahoots project would have the potential to significantly degrade the quality of the environment. Other

effects that would typically be considered cumulatively considerable would include substantial reduction of the habitat of a fish or wildlife species that causes a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or significantly reduce the number or restrict the range of a rare or endangered plant or animal species. None of these other effects apply to this project.

Because all project impacts will be mitigated to a level that is “less than significant”, the project will not result in impacts that are cumulatively considerable.

Direct Impact Analysis

The CEQA Guidelines define “significant effect on the environment” as a “substantial, or potentially substantial adverse change in the environment.” The CEQA Guidelines further indicate that there may be a significant effect on biological resources if the project will:

- A. Substantially affect an endangered, rare or threatened species of animal or plant or the habitat of the species.
- B. Interfere substantially with the movement of any resident or migratory fish or wildlife species to the extent that it adversely affects the population dynamics of the species.
- C. Substantially diminish habitat for fish, wildlife, or plants.

The project as proposed will impact a vegetation community considered sensitive by the County of San Diego - Non-Native Grassland. A tabulation of project habitat impacts is presented in Table 1.

Table 1. Existing, impacted, and preserved habitat on the project site.

| PLANT COMMUNITY | ACREAGE ON-SITE | IMPACTED ACREAGE ON-SITE | IMPACTED ACREAGE OFF-SITE | IMPACT NEUTRAL | ACREAGE PRESERVED ON-SITE | TOTAL MITIGATION REQUIRED (Ratio) | ON-SITE MITIGATION | OFF-SITE MITIGATION |
|----------------------|-----------------|--------------------------|---------------------------|----------------|---------------------------|-----------------------------------|--------------------|---------------------|
| EUCALYPTUS WOODLAND | 0.08 | N / A | N / A | N / A | N / A | N / A | N / A | N / A |
| DISTURBED HABITAT | 0.23 | N / A | N / A | N / A | N / A | N / A | N / A | N / A |
| NON-NATIVE GRASSLAND | 1.17 | 1.17 | 0 | 0 | 0 | 0.58 (0.5:1) | 0 | 0.58 |
| TOTAL | 1.48 | 1.17 | 0 | 0 | 0 | 0.58 | 0 | 0.58 |

Mitigation and Recommendations

The project as proposed will result in significant impacts to 1.17 acres of Non-Native Grassland, habitat considered sensitive by the County of San Diego. These impacts will require mitigation to reduce impacts to a level below significant and be in compliance with CEQA. The

appropriate ratio for mitigating impacts to this habitat types is 0.5:1. At this ratio, it will require 0.58 acres of habitat preserved in a county-approved mitigation bank to meet the mitigation requirements.

Limitations on construction activities during the bird nesting season (for raptors, February 1 to June 1; for migratory birds, February 1 to August 31st) are recommended to reduce impacts to avian resources. If it is determined by a qualified biologist that no nesting is occurring within 300 feet (for passerine birds) or 500 feet (for raptors) of construction activity, such activities may proceed with concurrence from the Planning and Development Services Department.

In order to prevent any adverse impacts to off-site resources, it is recommended that adequate measures (Best Management Practices) be taken during construction to prevent runoff from entering protected habitats, drainages, or other properties. These measures should be sufficient to reduce any possible indirect impacts of the proposed project to a level well below significant.

Impacts to sensitive biological resources will be mitigated to below a level of significance as defined by CEQA.

Thank you very much for the opportunity to conduct this work and prepare this report. Please contact me if I can provide any additional information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Everett". The signature is written in a cursive, flowing style.

William T. Everett, MS, FN, FRGS
San Diego County Approved Biological Consultant

LITERATURE CITED

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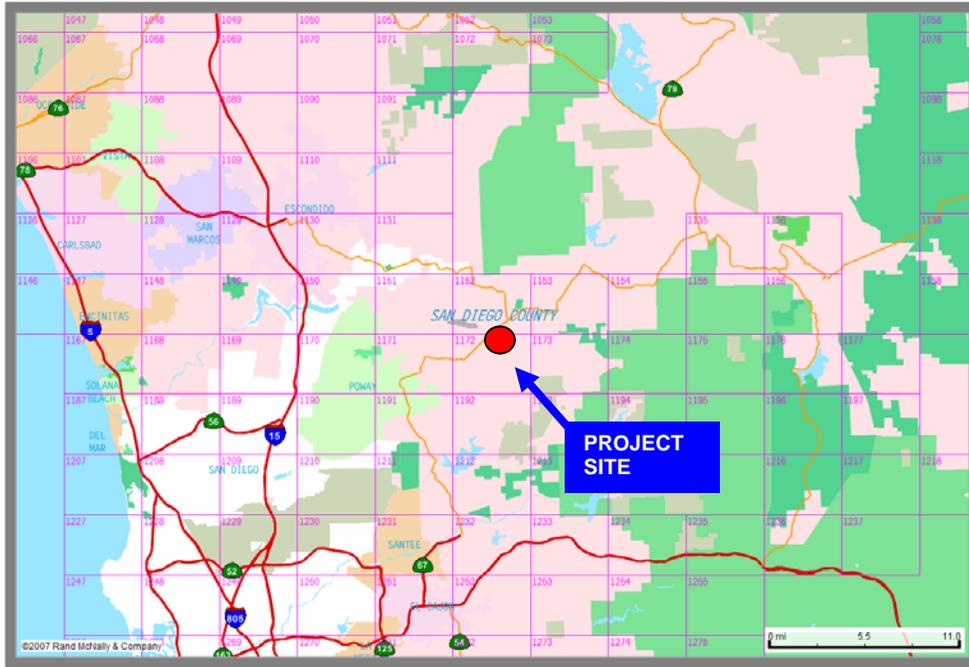


Figure 1. Location of project site in regional context. Thomas Bros. Map page #1152, E7.

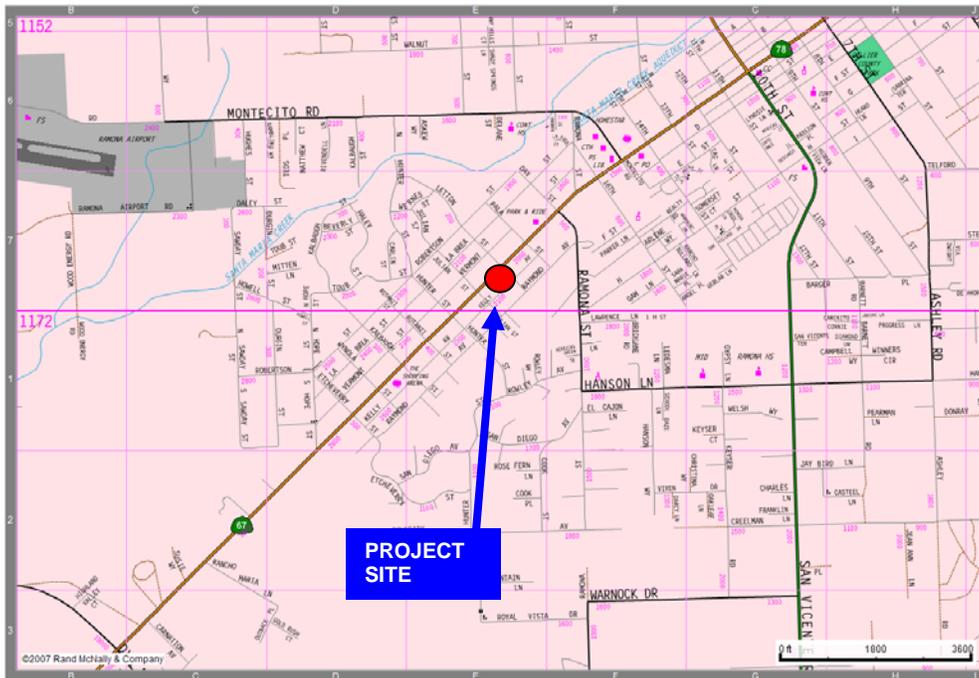


Figure 2. Detail location map of project site. Thomas Bros. Map page #1152, E7.

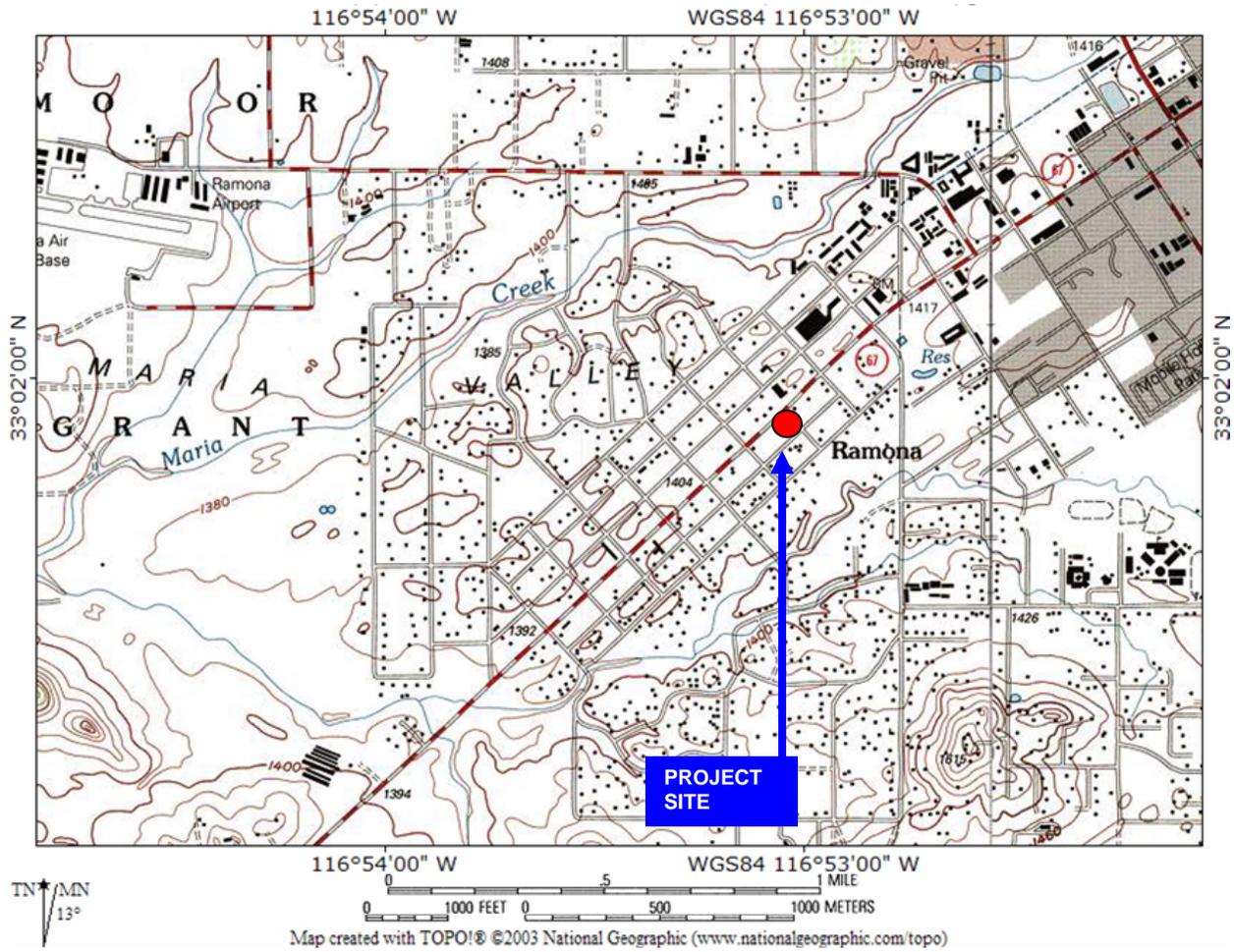


Figure 3. Topographical map showing project site location. Taken from USGS San Pasqual 7.5 minute series quadrangle.

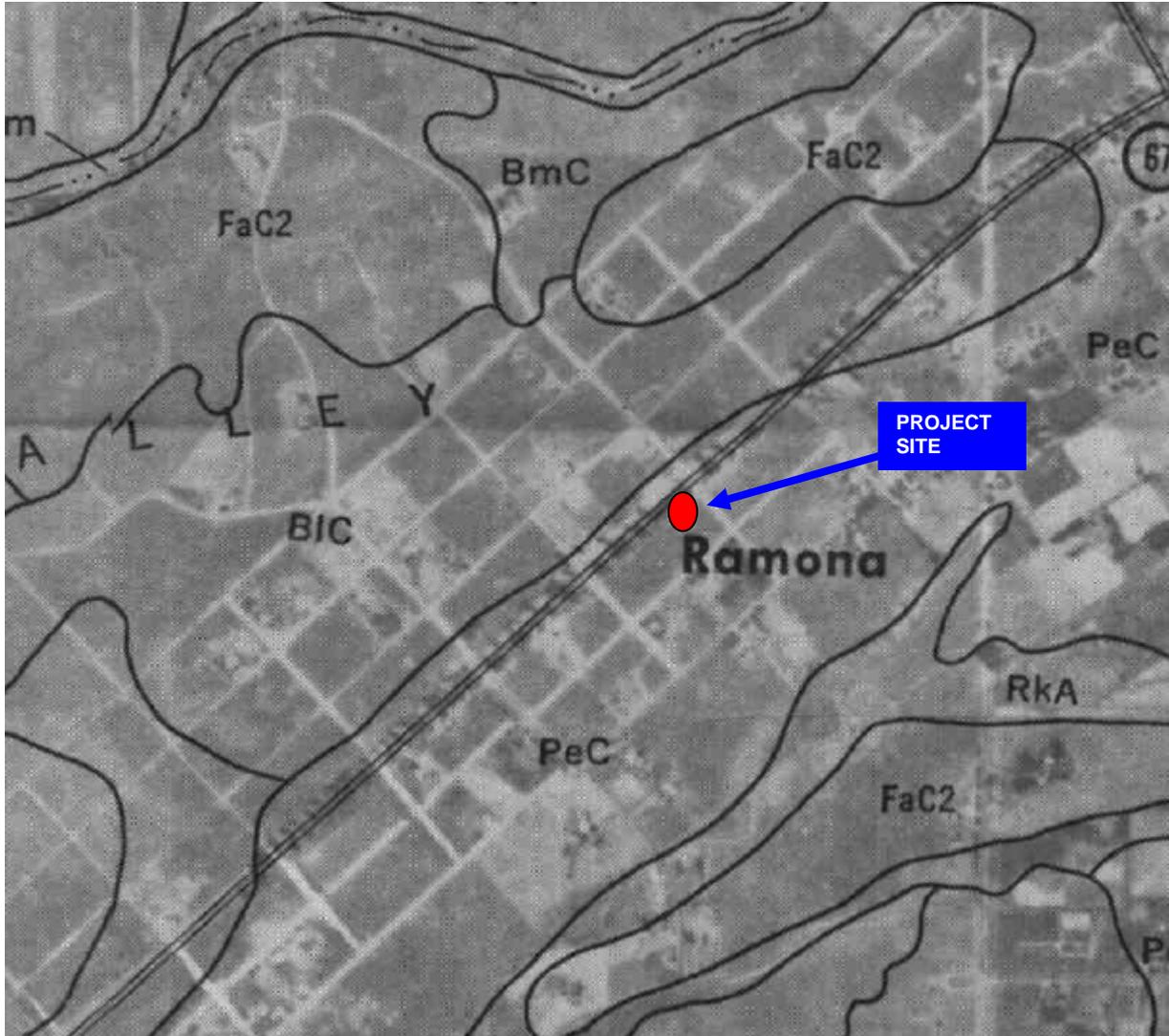


Figure 4. Soils map of the project site.

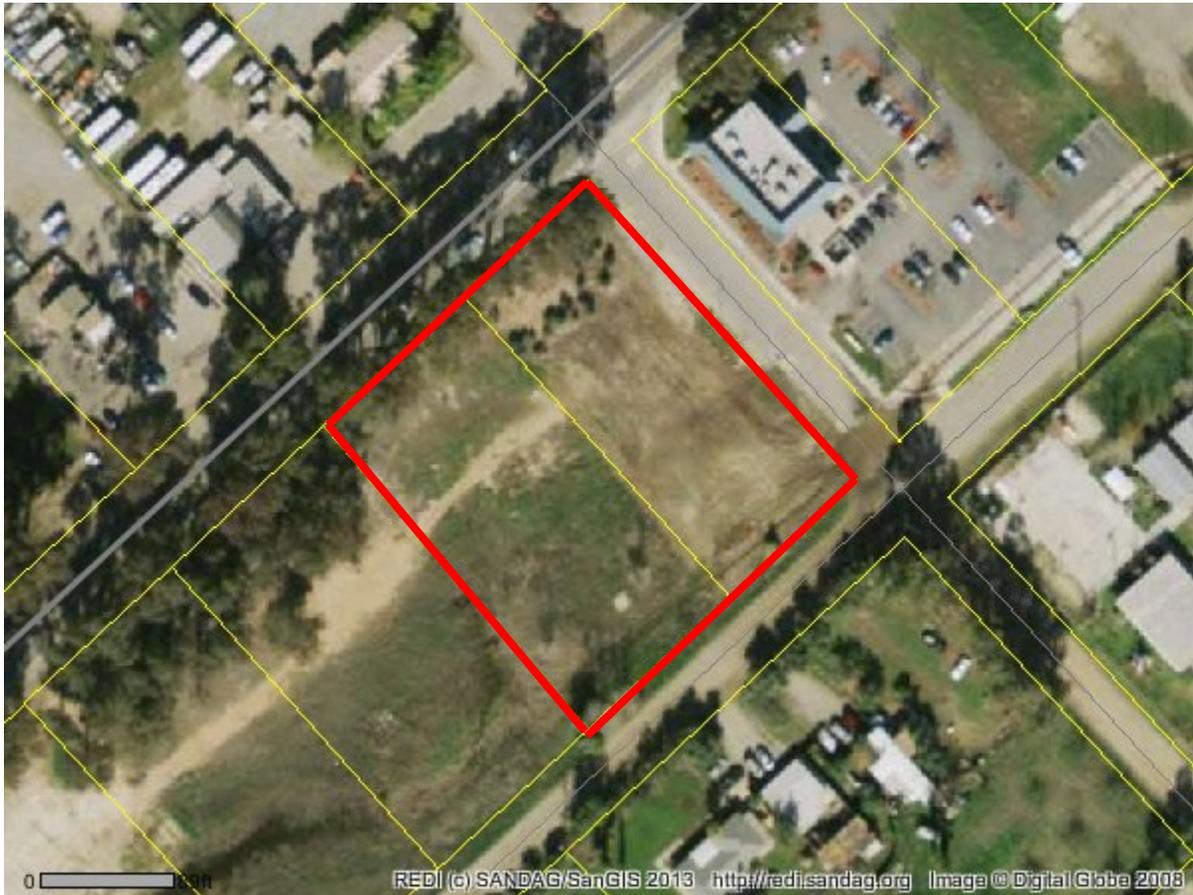


Figure 5. Close-up satellite photograph of project site (photograph by SANDAG/SanGIS 2008), showing parcel boundaries for the project site (outlined in red, in center) and adjacent properties in yellow. Top of photo is true north

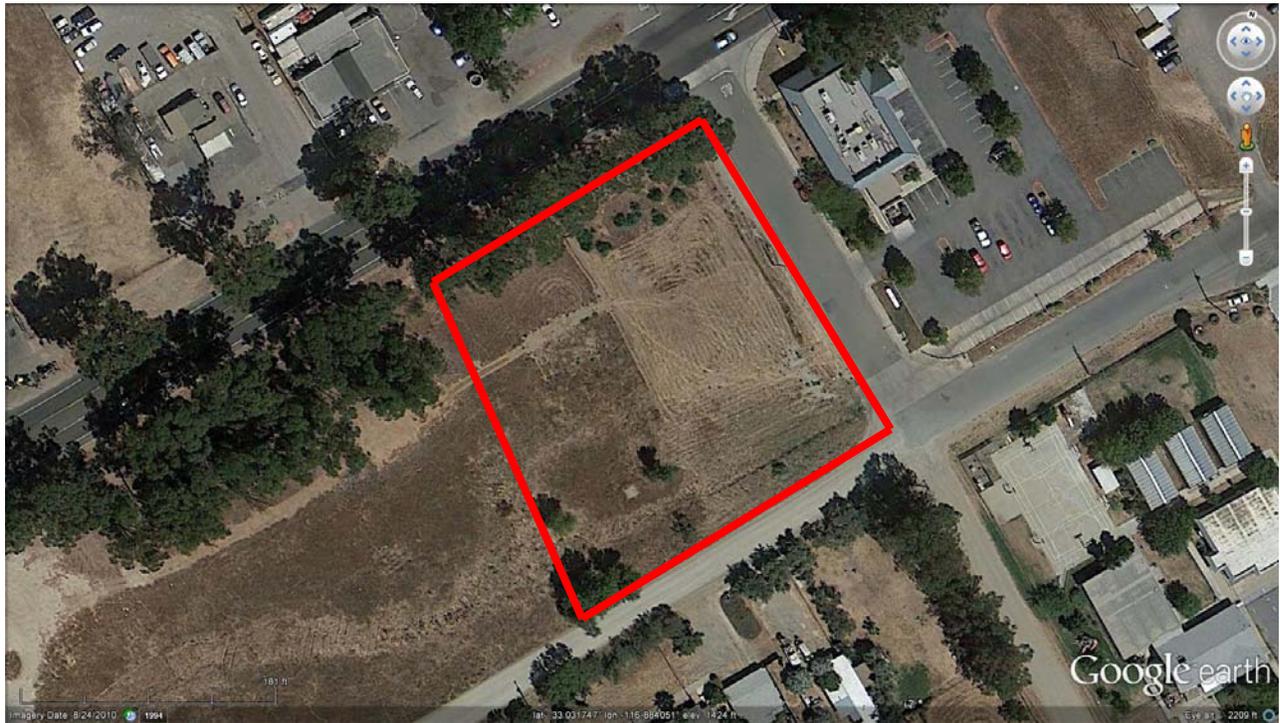


Figure 6. Color satellite photograph of project site. Approximate parcel boundaries are outlined in red.



Figure 7. Man-made drainage ditch diverting urban runoff east to west along the north side of Kelly Street. Dotted yellow line indicates areas where the drainage is at the surface, solid line indicates where the drainage is underground in culverts.

APPENDIX A

PLANT SPECIES OBSERVED ON THE PROJECT SITE

| <u>Family</u> | <u>Scientific Name</u> | <u>Common Name</u> |
|--|--------------------------|----------------------|
| Dicotyledoneae | | |
| Anacardiaceae - Sumac Family | | |
| | <i>Schinus molle</i> | Peruvian pepper tree |
| Asteraceae (Compositae) - Sunflower Family | | |
| | <i>Conyza canadensis</i> | Horseweed |
| Brassicaceae (Cruciferae) - Mustard Family | | |
| | <i>Brassica sp.</i> | Mustard |
| Chenopodiaceae - Goosefoot Family | | |
| | <i>Salsola tragus</i> | Russian Thistle |
| Fabaceae - Pea Family | | |
| | <i>Vicia villosa</i> | Winter Vetch |
| Geraniaceae - Geranium Family | | |
| | <i>Erodium sp.</i> | Filaree |

Myrtaceae - Myrtle Family

Eucalyptus sp.

Eucalyptus

Polygonaceae - Buckwheat Family

Rumex crispus

Curly Dock

Salicaceae - Willow Family

Populus fremontii

Western Cottonwood

Tamaricaceae -Tamarisk Family

Tamarix sp.

Tamarisk

Monocotyledoneae

Poaceae (Gramineae) - Grass Family

Bromus carinatus

California Brome

Bromus diandrus

Ripgut Grass

Bromus hordeaceus

Soft Chess

Bromus madritensis ssp. *rubens*

Red Brome

Distichlis spicata

Saltgrass

APPENDIX B**WILDLIFE SPECIES OBSERVED OR DETECTED
ON THE PROJECT SITE****BIRDS**

| | |
|----------------------|------------------------------|
| Red-tailed Hawk | <i>Buteo jamaicensis</i> |
| Anna's Hummingbird | <i>Calypte anna</i> |
| Bushtit | <i>Psaltriparus minimus</i> |
| Nuttall's Woodpecker | <i>Picoides nuttallii</i> |
| House Finch | <i>Carpodacus mexicanus</i> |
| European Starling | <i>Sturnus vulgaris</i> |
| American Crow | <i>Corvus brachyrhynchos</i> |

MAMMALS

| | |
|------------------------------|---------|
| California Ground Squirrel | Burrows |
| <i>Spermophilus beecheyi</i> | |
| Botta's Pocket Gopher | Burrows |
| <i>Thomomys bottae</i> | |

AMPHIBIANS AND REPTILES

None

APPENDIX C

PHOTOGRAPHS OF THE PROJECT SITE

All photographs taken 2013 by W.T. Everett



Photograph 1. Looking west from the corner of SR-67 and Letton Street. The highway is lined with very old eucalyptus trees, most of which are located within the right of way.



Photograph 2. Looking east from the northwest corner of the parcel.



Photograph 3. Disturbed area in the northwest corner of the parcel.



Photograph 4. Man-made drainage ditch along the south side of the parcel.



Photograph 5. Drainage ditch choked with dead mustard stocks.



Photograph 6. Looking from the southwest corner of the parcel towards the east.



Photograph 7. Southeast corner of the project site where urban runoff crosses Letton Street and enters the site.



Photograph 8. East side of Letton Street, behind the Denny's restaurant. Urban runoff passes through the low spot in the paved parking lot.

APPENDIX D

**COUNTY LIST OF SENSITIVE SPECIES WITH POTENTIAL TO OCCUR
ON THE PROJECT SITE**

Legend**Status**

- 1 = Federally Endangered
- 2 = Federally Threatened
- 3 = State Endangered
- 4 = State Threatened
- 5 = State Rare
- 6 = MSCP Narrow Endemic
- 7 = Not Listed
- 8 = County Sensitive Plant List Designation (A-D), County Sensitive Animal List Group (1 or 2)
- Ext = Extirpated

Potential to Occur On-site

L = Low

M = Moderate

H = High

U = Unknown (Sufficient data are not available on the status, distribution, abundance, or natural history of the species to make a reliable determination of the probability of occurring on-site)

Note: Species shown in **bold** are those for which
Directed Surveys were conducted

Rationale

1 = Would likely have been detected during directed surveys if present

2 = Appropriate suitable habitat not present on-site. Habitat type may be present on-site, but is likely disturbed, fragmented, isolated, small in extent, dominated by edge effects, may not have appropriate soil type, micro habitat conditions, or is otherwise not suitable for use by the sensitive species.

3 = Insufficient natural history information is available to determine is presence is likely

| Scientific Name | Common Name | Status | Observed On-Site (Y or N) | Potential to Occur On-site | Habitat Preferences |
|--|----------------------------|----------------|----------------------------------|-----------------------------------|---|
| <i>Acanthomintha ilicifolia</i> | San Diego thornmint | 2,3, 8A | N | L - 1 | Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools |

| | | | | | |
|-------------------------------------|-------------------------------|-------|---|-------|---|
| <i>Brodiaea orcutti</i> | Orcutt's brodiaea | 7, 8A | N | L - 2 | Grassland, Riparian, Oak Woodland, Chamise Chaparral, Vernal Pools |
| <i>Centromadia parryi australis</i> | Smooth tarplant | 7, 8A | N | L - 2 | Grassland |
| <i>Gilia caruifolia</i> | Caraway leaved gilia | 7, 8D | N | L - 1 | Grassland, Chamise Chaparral, Mixed Conifer |
| <i>Harpagonella palmeri</i> | Palmer's grappling hook | 7, 8D | N | L - 2 | Coastal Sage Scrub, Grassland, Chamise Chaparral |
| <i>Hordeum intercedens</i> | Vernal barley | 7, 8C | N | L - 2 | Grassland, salt or Alkali Marsh |
| <i>Holocarpha virgata elongata</i> | Graceful tarplant | 7, 8D | N | L - 2 | Grassland |
| <i>Navarretia fossalis</i> | Spreading navarretia | 2, 8A | N | L - 2 | Coastal Sage Scrub, Grassland, Chamise Chaparral, Vernal Pools |
| <i>Branchinecta sandiegoensis</i> | San Diego fairy shrimp | 1(1) | N | L - 2 | Grassland, Vernal Pools |
| <i>Danaus plexippus</i> | Monarch butterfly | 7(2) | N | L - 2 | Grassland, Oak Woodland, Montane Meadow |
| <i>Anniella pulchra pulchra</i> | Silvery legless lizard | 7(2) | N | L - 2 | Coastal Sage Scrub, Grassland, Riparian, Coastal or Desert Dune |
| <i>Scaphiopus hammondii</i> | Western spadefoot toad | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Freshwater Marsh, Vernal Pools |
| <i>Coleonyx variegates abbottii</i> | San Diego banded gecko | 7(1) | N | L - 2 | Riparian, Freshwater Marsh, Montane Meadow, Lakes and Bays |

| | | | | | |
|---|---------------------------------|-------------|----------|--------------|--|
| <i>Phrynosoma coronatum blainvillei</i> | San Diego horned lizard | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Chamise Chaparral, Mixed Conifer |
| <i>Cnemidophorus hyperythrus</i> | Orange-throated whiptail | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Chamise Chaparral |
| <i>Corynorhinus townsendii</i> | Townsend's big-eared bat | 7(2) | N | L - 2 | Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow |
| <i>Antrozous pallidus</i> | Pallid bat | 7(2) | N | U - 3 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow |

| | | | | | |
|---------------------------------|--------------------------|------|---|-------|--|
| <i>Myotis yumanensis</i> | Yuma myotis | 7(2) | N | U - 3 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays |
| <i>Nyctinomops femorosaccus</i> | Pocketed free-tailed bat | 7(2) | N | U - 3 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays |

| | | | | | |
|---|-----------------------------------|------|---|-------|--|
| <i>Nyctinomops macrotis</i> | Big free-tailed bat | 7(2) | N | U - 3 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays |
| <i>Eumops perotis californicus</i> | Greater western mastiff bat | 7(2) | N | L - 3 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Freshwater Marsh, Desert Scrub, Desert Wash, Salt or Alkali Marsh, Vernal Pools, Montane Meadow, Lakes and Bays |
| <i>Lepus californicus bennettii</i> | San Diego black-tailed jackrabbit | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest |
| <i>Chaetodipus californicus femoralis</i> | Dulzura California pocket mouse | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer |

| | | | | | |
|----------------------------------|-------------------------------------|----------------|----------|--------------|--|
| <i>Onychomys torridus Ramona</i> | Southern grasshopper mouse | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Chamise |
| <i>Chaetodipus fallax fallax</i> | Northwestern San Diego pocket mouse | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Chamise Chaparral, Desert Scrub, Desert Wash |
| <i>Dipodomys stephensi</i> | Stephen's kangaroo rat | 1, 4(1) | N | L - 2 | Coastal Sage Scrub, Grassland |
| <i>Odocoileus hemionus</i> | Southern mule deer | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow |
| <i>Taxidea taxus</i> | American badger | 7(2) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Pinon-Juniper, Desert Scrub, Desert Wash, Montane Meadow |
| <i>Elanus caeruleus</i> | Black-shouldered kite | 7(1) | N | L - 2 | Grassland, Riparian |
| <i>Accipiter cooperi</i> | Cooper's hawk | 7(1) | N | M | Grassland, Riparian, Oak Woodland |

| | | | | | |
|-------------------------------------|--------------------------------|------|---|-------|---|
| <i>Aquila chrysaetos</i> | Golden eagle | 7(1) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest, Pinon-Juniper |
| <i>Circus cyaneus hudsonius</i> | Northern harrier | 7(1) | N | L - 2 | Grassland, Freshwater Marsh, Salt or Alkali Marsh |
| <i>Buteo regalis</i> | Ferruginous Hawk (Winter) | 4(1) | N | L - 2 | Grassland, Desert Scrub |
| <i>Cathartes aura</i> | Turkey vulture | 7(1) | N | L - 2 | Coastal Sage Scrub, Mixed Chaparral, Grassland, Riparian, Oak Woodland, Chamise Chaparral, Mixed Conifer, Closed Cone Forest |
| <i>Branta canadensis</i> | Canada Goose | 7(2) | N | L - 2 | Grassland, Lakes and Bays |
| <i>Athene cunicularia hypugea</i> | Burrowing Owl | 7(1) | N | L - 2 | Coastal Sage Scrub, Grassland, Desert Wash, Coastal or Desert Dune |
| <i>Larus californicus bennettii</i> | California Gull (Non-breeding) | 7(2) | N | L - 2 | Not Specified |
| <i>Eremophila alpestris actis</i> | Horned lark | 7(2) | N | L - 2 | Grassland, Montane Meadow |
| <i>Lanius ludovicianus</i> | Loggerhead Shrike | 7(1) | N | L - 2 | Coastal Sage Scrub, Grassland, Riparian, Oak Woodland, Desert Scrub, Desert Wash |
| <i>Ammodramus savannarum</i> | Grasshopper sparrow | 7(1) | N | L - 2 | Grassland |

| | | | | | |
|--------------------------|-----------------------------|-------------|----------|--------------|--|
| <i>Agelaius tricolor</i> | Tricolored blackbird | 7(1) | N | L - 2 | Grassland, Riparian, Freshwater Marsh |
|--------------------------|-----------------------------|-------------|----------|--------------|--|

APPENDIX E**PREPARER QUALIFICATIONS**

William T. Everett is a research, consulting, and conservation biologist with more than 37 years experience in the San Diego environment and around the world. He has logged more than 14,000 hours of field work, all detailed with field notes. In the 1970's Bill apprenticed in the study of chaparral ecology under Frank Gander, the retired but renown premier California botanist of the 1930s and 40s. Although his specialty is ornithology, Bill has a long-standing interest in all endangered species management and conservation issues. As President then Conservation Chairman of the San Diego Chapter of the Audubon Society in the late 1970s, he gained a keen understanding of the conservation challenges facing a growing Southern California. He subsequently became one of the first Biological Consultants certified by the County of San Diego in the 1980s. Bill is a Fellow of the National Association of Environmental Professionals (NAEP) and subscribes to the NAEP Code of Ethics and Standards of Practice for Environmental Professionals.

Bill Everett has published numerous scientific articles and conducted research in Southern California, Alaska, Antarctica, Baja California, South America, and throughout the tropical Pacific Ocean. In 1977, in recognition of his accomplishments, he was appointed as a Research Associate of the Department of Birds and Mammals of the San Diego Natural History Museum, a position he holds to this day. In 1990 he was elected as a Research Fellow of the Zoological Society of San Diego, and in 1988 was appointed as the Senior Conservation Biologist of the Western Foundation of Vertebrate Zoology. The Royal Geographic Society of London elected Bill as a Fellow in 1996, following his election as a Fellow of the Explorers Club in 1990.

Hired as a biologist for the U.S. Fish and Wildlife Service in 1977, Bill conducted research on endangered Peregrine Falcons in Northern California at a time when their continued existence was questionable. His interest in threatened species led to publication by the Audubon Society in 1979 of his paper entitled "Threatened, Declining and Sensitive Bird Species in San Diego County" (Sketches 36:1-2). This paper contained the first published account of the decline of the California Gnatcatcher.

Beyond the Southern California area, Bill has prepared the seabird impacts sections for the Draft and Final Environmental Impact Statements for Hawaii-based Pelagic Fisheries of the Western Tropical Pacific Ocean (2001), received a National Science Foundation major grant to lead an International Biocomplexity Survey and Expedition to Isla Guadalupe, Baja California, Mexico (2000), led the effort to save North America's most endangered bird species, the San

Clemente Loggerhead Shrike (1991-1997), and currently heads up efforts to restore bird populations on Wake Atoll and Christmas Island in the central Pacific.

Bill holds a U.S. Fish and Wildlife Master Bird Banding Permit (#22378) with Endangered Species Authorization, and California Gnatcatcher Survey Authorization Permit # TE-788036. He received his Masters Degree from the University of San Diego in 1991, and completed a Post-Graduate Program at Harvard University's John F. Kennedy School of Government in 1997.

Bill served as a member of the Conservation and Research Committee of the Zoological Society of San Diego since the committee was first established. In 1990, he founded the Endangered Species Recovery Council (www.esrc.org), an international organization of scientists and conservationists dedicated to finding solutions to the problem of species extinctions. He continues as President of the organization.

In May 2002 Bill was honored in New York as a first recipient of the Explorers Club "Champions of Wildlife" award.

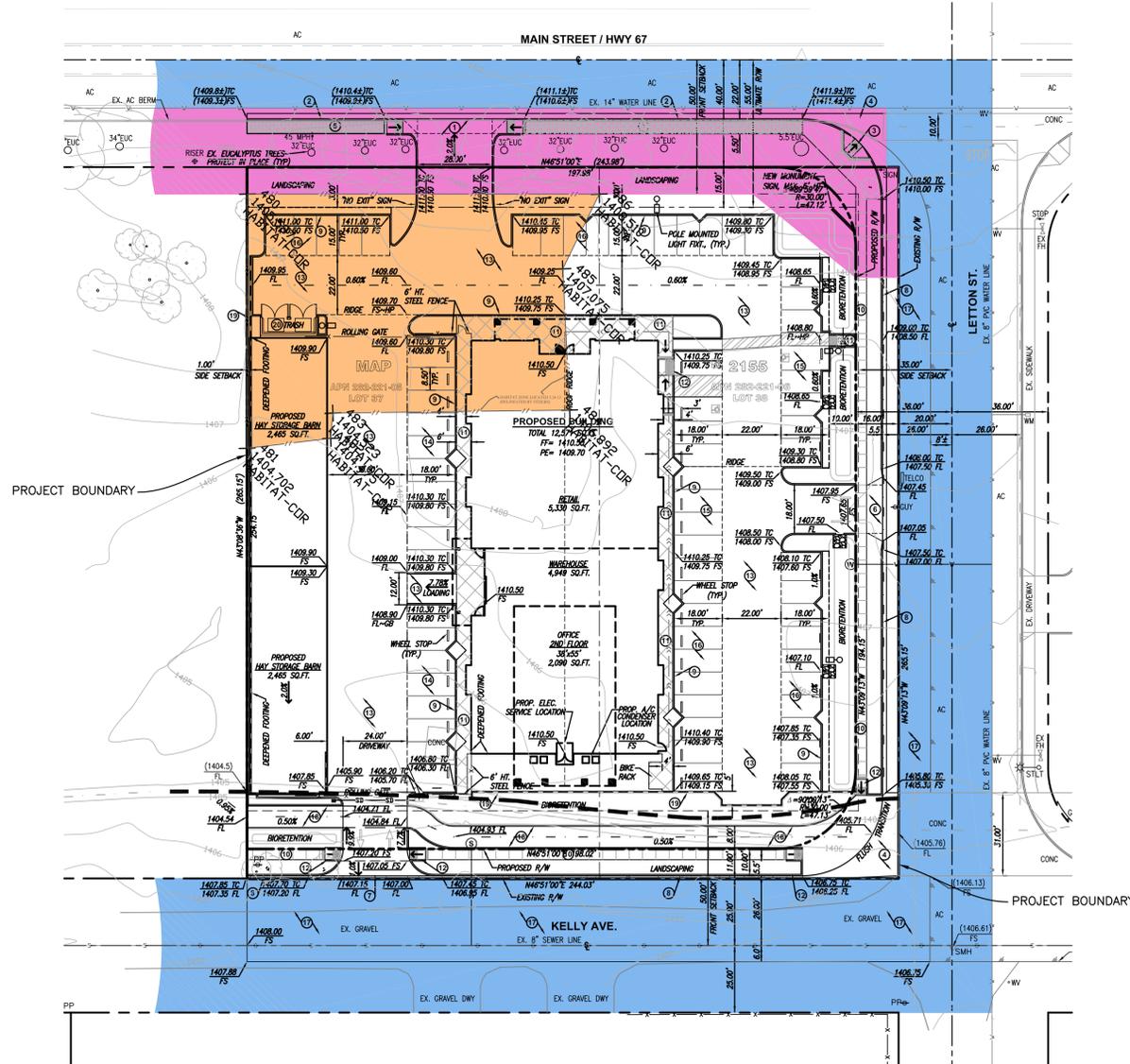
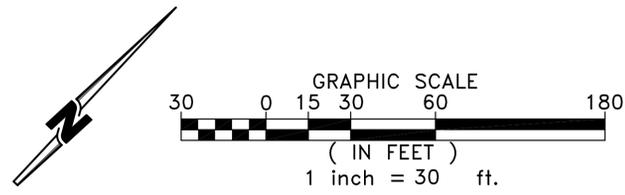
LEGEND

- EUCALYPTUS WOODLAND
HOLLAND CODE 79100
- URBAN / DEVELOPED
HOLLAND CODE 12000
- DISTURBED HABITAT
HOLLAND CODE 11300
- NON-NATIVE GRASSLAND
HOLLAND CODE 42200

--- MAN-MADE DRAINAGE

BIOLOGICAL RESOURCES MAP

ER LOG # 3910 12-09-003
APN NOS. 282-221-05 & 06



EXISTING, IMPACTED, AND PRESERVED HABITAT ON THE PROJECT SITE

| PLANT COMMUNITY | ACREAGE ON-SITE | IMPACTED ACREAGE ON-SITE | IMPACTED ACREAGE OFF-SITE | IMPACT NEUTRAL | ACREAGE PRESERVED ON-SITE | TOTAL MITIGATION REQUIRED (Ratio) | ON-SITE MITIGATION | OFF-SITE MITIGATION |
|----------------------|-----------------|--------------------------|---------------------------|----------------|---------------------------|-----------------------------------|--------------------|---------------------|
| EUCALYPTUS WOODLAND | 0.08 | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| DISTURBED HABITAT | 0.23 | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| NON-NATIVE GRASSLAND | 1.17 | 1.17 | 0 | 0 | 0 | 0.58 (0.5:1) | 0 | 0.58 |
| TOTAL | 1.48 | 1.17 | 0 | 0 | 0 | 0.58 | 0 | 0.58 |

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