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November 17, 2005
M&A #05-126-01

Ms. Karen Adler
PlanCom, Inc.
302 State Place
Escondido, CA 92029

Re: Biological Letter Report for the SS639-01 Veterans of Foreign Wars Hall Cingular® Wireless Project, Located in the County of San Diego, California

Dear Ms. Adler:

SUMMARY OF FINDINGS

Merkel & Associates, Inc. (M&A) conducted a general biological survey of the proposed Cingular® wireless facility project site on the Veterans of Foreign Wars Hall (VFW) property, located in the Metro-Lakeside-Jamul Segment of the County of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan. The purpose of this investigation was to determine the extent of biological resources present within the study area; identify potential biological resource impacts resulting from the proposed project; and recommend measures to avoid, minimize, and/or mitigate significant impacts consistent with the California Environmental Quality Act (CEQA) and the County of San Diego MSCP Subarea Plan, Resource Protection Ordinance (RPO), and Biological Mitigation Ordinance (BMO) (amended 2004).

The project site is situated adjacent to 4 existing wireless facilities and VFH Hall. The area to the north is urban developed and contains the VFWH facilities and there is a slope to the south of the proposed Cingular® wireless facility that is comprised of southern mixed chaparral and non-native grassland with an extensive amount of rock outcropping. The entire south slope is recovering post-fire. The project site is not located within or adjacent to a County of San Diego Conservation Area or a generalized MSCP Core Biological Resource Area or Linkage. No sensitive species listed under federal, state, or local regulatory authorities were detected within the study area during the biological survey.

The project consists of the construction of a Cingular® wireless facility including a 50-foot high mono-broadleaf faux tree, a block shelter and an underground telco and power lines. The proposed project would result in significant direct impacts to southern mixed chaparral and non-native grassland; however, implementation of the Project Mitigation Measures should reduce biological impacts to a level below significance and ensure conformance with the County of San Diego MSCP Subarea Plan, RPO, and BMO.

INTRODUCTION

Merkel & Associates, Inc. (M&A) conducted a general biological survey of the proposed 3.47-acre Cingular® wireless facility project site on the Veterans of Foreign Wars (VFW) Hall property, located in the Metro-Lakeside-Jamul Segment of the County of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan. The purpose of this investigation was to determine the extent of biological resources present within the study area; identify potential biological resource impacts resulting from the proposed project; and recommend measures to avoid, minimize, and/or mitigate significant impacts consistent with the California Environmental Quality Act (CEQA) and the County of San Diego MSCP Subarea Plan, Resource Protection Ordinance (RPO), and Biological Mitigation Ordinance (BMO) (amended 2004).

PROJECT SITE LOCATION

The VFW Hall property is located at 844 Tavern Road, in the County of San Diego (Assessors Parcel Number 403-380-80). The project site lies within Section 28, Township 15 South, Range 2 East of the San Bernardino Base and Meridian; U.S. Geological Survey 7.5' Alpine, California Quadrangle (Latitude 32° 50' 28"N, Longitude 116° 47' 15"W; Universal Transverse Mercator coordinates $^{05}19^{886E}$, $^{36}33^{692N}$ Zone 11) (Figure 1).

PROPOSED PROJECT DESCRIPTION

The proposed project includes the construction and maintenance of a Cingular® wireless facility. The facility would consist of 4 antennas, grouped in 3 antenna arrays, to make a total of 12 antennae. The antennas would be mounted on one, 50-foot high mono-broadleaf faux tree. The facility would also consist of support equipment in the form of 6 self-contained Base Transceiver Station indoor equipment cabinets, containing the electronic equipment necessary to operate the facility. The support equipment would be located within a Concrete Masonry Unit (CMU) block shelter, and would be screened by native vegetation plantings. Two Air-conditioning Units would also be placed on the roof, behind a 4-foot parapet. Telco and power lines would be routed to the facility via an underground trench from an existing utility pole located approximately 40 feet north of the proposed facility. It is anticipated that maintenance of a 100-foot fuel modification zone would be required around the proposed equipment cabinets (County of San Diego Fire Code Ordinance 9669 and Karen Adler, pers. com.). Access to the construction site would be provided from Tavern Road via an existing, approximate 18-foot wide paved access road, and no widening improvements of the road are expected to be required.

METHODS AND SURVEY LIMITATIONS

LITERATURE REVIEW

Existing literature pertaining to the project region was reviewed prior to the initiation of the field survey(s). This literature review included a determination of the potential soils types on-site based on the U.S. Department of Agriculture Soil Conservation Service map for the project area; a database query of potential on-site sensitive species based on a determination of the site physical characteristics (including eco-region, elevation, soils/substrate, and topography); and documentation of California Natural Diversity Database (CNDDB)/U.S. Fish and Wildlife Service (USFWS)

Geographical Information System (GIS) records for the project vicinity. Applicable information was used to assess the presence or potential for presence of sensitive habitats and species on the project site.

SURVEY DATE, TIMES, AND CONDITIONS

M&A biologists, Roland A. Sosa and Bonnie L. Peterson (County Certified Biologist), conducted the biological surveys of the VFW Hall Cingular® wireless facility project site in September 2005 (Table 1). Since the proposed wireless facility would affect only a small portion of the parcel, the study area only included the facility and access road, a 100-foot fuel modification zone around the facility, and 100 feet beyond all project elements (*e.g.*, mono-broadleaf tree, CMU, underground telco and electric run, and existing paved access road).

Table 1. Summary of Biological Survey Date, Times, Conditions, and Biologist(s)

Biological Survey	Date	Time	Conditions (start to end)	Biologist(s)
General Biology	9/23/05	0730 - 0840	Weather: 50%-80% cc Wind: 3 BS Temperature: 68°-72° F	Roland A. Sosa Bonnie L. Peterson

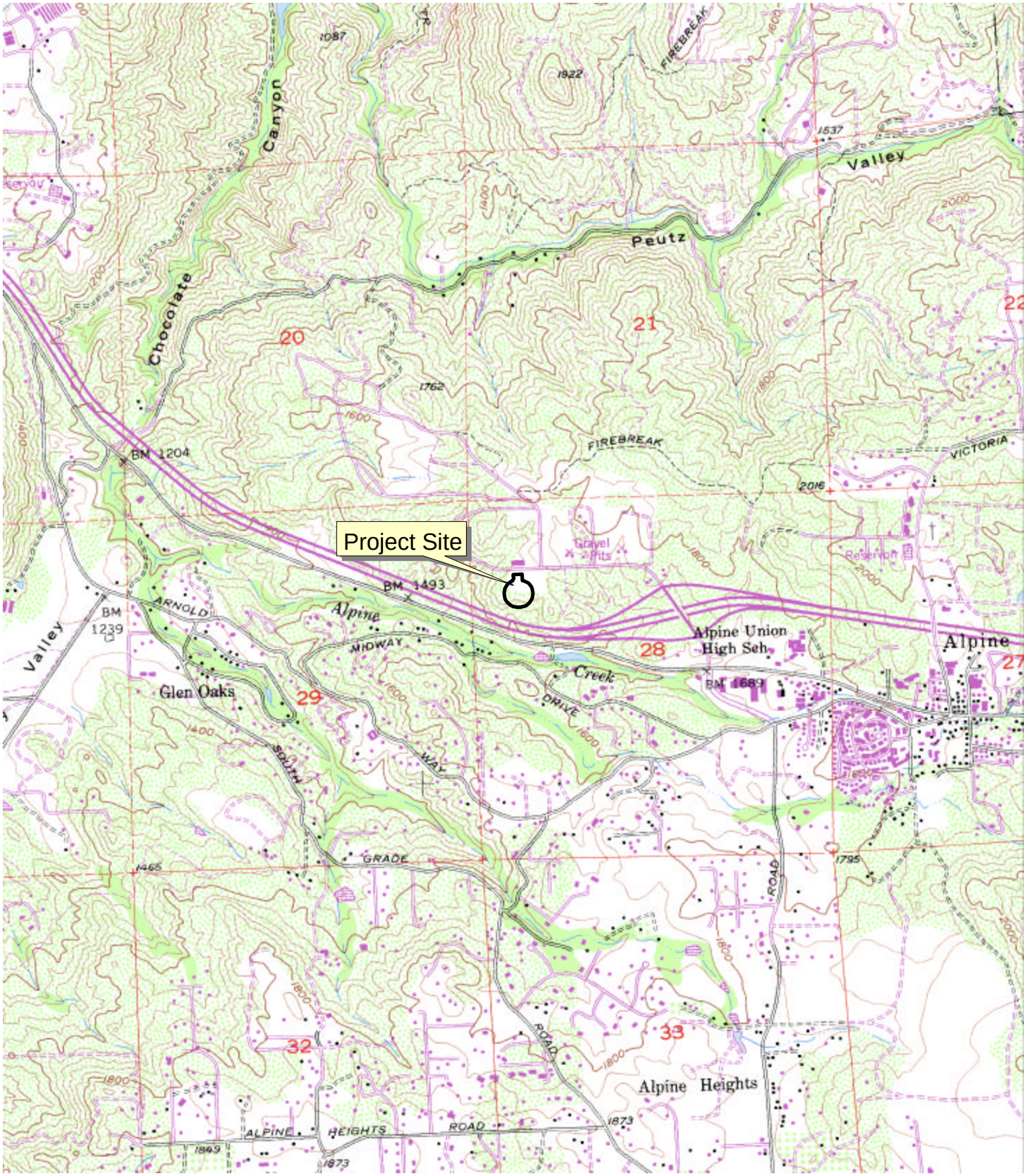
cc = cloud cover; BS = Beaufort Scale; F = Fahrenheit

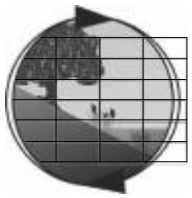
GENERAL BIOLOGICAL SURVEY

The study area was surveyed on-foot. Plant identifications were either resolved in the field or later determined through verification of voucher specimens, and wildlife species were determined through direct observation (aided by binoculars), identification of songs, call notes and alarm calls, or by detection of sign (*e.g.*, burrows, tracks, scat, etc.). Field survey data was initially delineated onto an approximate 1” = 90’ scale, color aerial photograph (with topographical overlay) of the project site, and then digitized into ArcView GIS version 3.2.

SURVEY LIMITATIONS

Biological inventories generally include various survey limitations. Depending on the season and time of day during which field surveys are conducted, some species of annual plants, invertebrates, amphibians, reptiles, birds, and mammals may not be detected due to temporal species variability. The biological survey conducted for this project was performed during the morning hours in early autumn 2005; therefore, some species of annual plants and butterflies, as well as nocturnal species, may not have been detected. However, based on the literature review conducted as well as the knowledge of species-specific habitat requirements and distribution patterns, it is anticipated that the probability of these species being present on or utilizing the site can be fairly accurately predicted without the need for additional focused surveys.





N
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1" = 2000'

Project Vicinity Map

SS639-01 Veterans of Foreign Wars Hall
Cingular Wireless Project

Source: USGS 7.5' Alpine, CA Quadrangle

Figure 1

SCIENTIFIC NOMENCLATURE

This report was written in accordance with the County of San Diego Biological Survey Guidelines and Biological Resource Mapping Requirements (revised June 2002). Scientific nomenclature used in this report is from the following references: vegetation, Holland (1986) and Oberbauer (1996); flora, Hickman (1993) and Baldwin *et al*. (2004); amphibians and reptiles, Crother *et al.* (2001 and 2003); birds, American Ornithologists' Union (1998 and 2004); and mammals, Wilson and Reeder (1993).

RESULTS

PHYSICAL CHARACTERISTICS

The project site is situated adjacent to 4 existing wireless facilities (Verizon®, T-Mobile®, Nextel®, and Sprint®), located approximately 60 feet to the north of the proposed Cingular® wireless facility, at an approximate elevation of 1675 feet above mean sea level. Underlying surficial geology is mapped as Mesozoic granitic rock (Strand 1962), and on-site soils are mapped as Cieneba rocky coarse sandy loam, 9% to 30% slopes, and Cieneba-Fallbrook rocky sandy loam, 30% to 65% slopes (Bowman *et. al.* 1973). The project site is surrounded by urban/developed lands to the north, consisting of the existing wireless facilities and the VFW Hall. There is a mixture of native and non-native vegetation on a steep slope to the south.

VEGETATION COMMUNITIES AND BOTANICAL RESOURCES

Six vegetation categories were identified within the study area during the biological survey (Table 2; Figure 2; Appendix 1). Rock outcroppings were identified throughout most of the slope to the south of the proposed facility site in both the mixed chaparral and the non-native grassland habitats.

Table 2. Summary of the Vegetation Types Present within the Study Area

Vegetation Categories	Holland/Oberbauer Code	MSCP Tier Habitat Type	Acreage
Southern Mixed Chaparral	37120	Upland, Tier III	0.59
Disturbed Southern Mixed Chaparral	37120	Upland, Tier III	0.13
Non-Native Grassland	42200	Upland, Tier III	1.27
Eucalyptus Woodland	11100	Upland, Tier IV	0.02
Non-native Vegetation	11000	Upland, Tier IV	0.46
Urban/Developed Land	12000	Upland, Tier IV	1.00
		Total:	**3.47**

SOUTHERN MIXED CHAPARRAL

It is likely that this vegetation is recovering post-fire southern mixed chaparral habitat, occupying portions of the slope to the south of the proposed facility site, based on the presence of chaparral indicator species and the extensive amount of rock outcropping. Dominant indicator species include interior flat-top buckwheat (*Eriogonum fasciculatum* Benth. var. *foliolosum*), laurel sumac (*Malosma laurina*), and black mustard (*Brassica nigra*), but also includes mission manzanita (*Xylococcus*

bicolor), Ramona ceanothus (*Ceanothus tomentosus*), chamise (*Adenostoma fasciculatum*), and white sage (*Salvia apiana*).

DISTURBED SOUTHERN MIXED CHAPARRAL

Disturbed southern mixed chaparral occupies a small area on the western end of the site. This portion of the site seems to be utilized as a garden and has remnants of southern mixed chaparral vegetation, some of which appears planted, and citrus trees (*Citrus* sp.). The native species include interior flat-top buckwheat, California encelia (*Encelia californica*), and broom baccharis (*Baccharis sarothroides*).

NON-NATIVE GRASSLAND

Non-native grassland dominates much of the slope but does have some southern mixed chaparral species interspersed. The non-native grassland habitat is probably present due to the sites recent fire history and the urban development influence. Dominant indicator species include non-native forbs such as black mustard (*Brassica nigra*) and tocalote (*Centaurea melitensis*), and non-native grasses such as slender wild oat (*Avena barbata*), red brome (*Bromus madritensis* ssp. *rubens*), and fountain grass (*Pennisetum setaceum*) interspersed with small shrubs such as laurel sumac and flat-top buckwheat.

NON-NATIVE VEGETATION

Non-native vegetation is found mostly on the north end of the project site. Dominant species in this vegetation category include but are not limited to hottentot-fig (*Carpobrotus edulis*), tree tobacco (*Nicotiana glauca*), and broom baccharis.

EUCALYPTUS WOODLAND

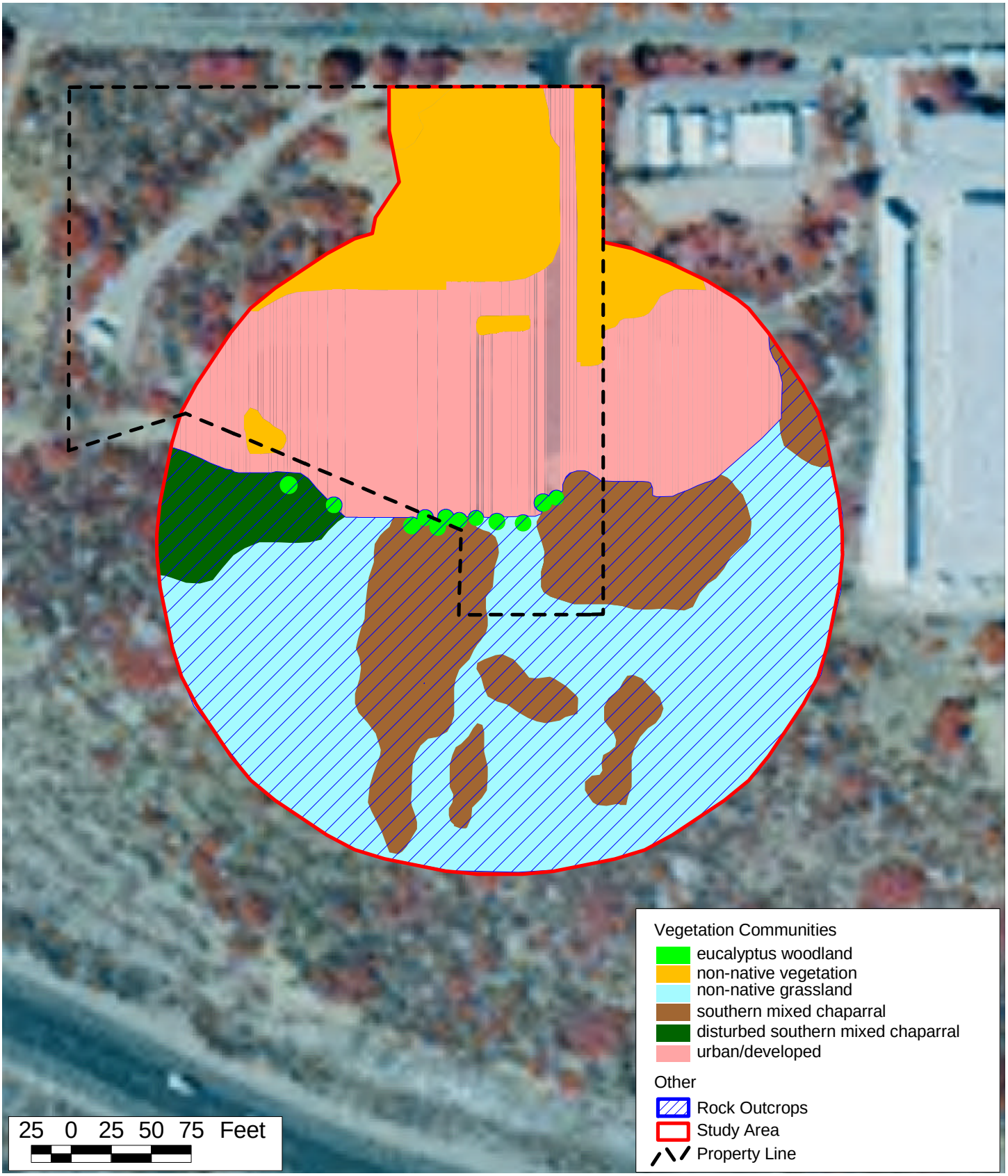
A strand of eucalyptus trees (*Eucalyptus* sp.) is located on the top edge of the slope, to the south of the proposed facility site, delineating the urban/developed lands from southern mixed chaparral and non-native grasslands.

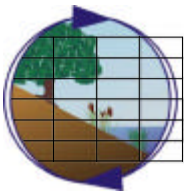
URBAN/DEVELOPED LANDS

Urban/developed lands consist of the existing VFW structure and its associated asphalted parking area and driveway. Urban/developed lands are also present on the adjacent property to the east of the project site.

WILDLIFE HABITAT AND ZOOLOGICAL RESOURCES

A limited number of fauna species were noted within the study area during the biological survey (Appendix 2). An American crow (*Corvus brachyrhynchos*) was observed flying over the study area. Western scrub-jay (*Aphelocoma californica*) and California towhee (*Pipilo crissalis*) were observed in the southern mixed chaparral. Also, a rabbit (*Sylvilagus* sp.) was observed in the non-native grassland. No raptors or raptor nests were detected during the biological survey.





Biological Resources Map

SS639-01 Veterans of Foreign Wars Hall
Cingular Wireless Project

Figure 2

The overall value of the wildlife habitat is considered to be low, based on the existing vegetation being constrained on the slope between the I-8 freeway and urban development, the predominance of non-native flora species, and evidence that this is a fairly recent burn site.

RARE AND/OR ENDANGERED OR SENSITIVE SPECIES AND HABITATS

The County of San Diego RPO defines "sensitive habitat lands" as follows:

> "Land which supports unique vegetation communities, or the habitat of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State California Environmental Quality Act (CEQA) Guidelines (14 Cal. Admin. Code Section 15000 *et seq*.). Sensitive habitat lands includes the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem or which serves as a functioning wildlife corridor."
>
> "Unique vegetation community refers to associations of plant species which are rare or substantially depleted due to development. These may contain rare or endangered species, but other species may be included because they are unusual or limited due to a number of factors, for example: (a) they are only found in the San Diego region; (b) they are a local representative of a species or association of species not generally found in San Diego County; or (c) they are outstanding examples of the community type as identified by the California Department of Fish and Game listing of community associations."

County of San Diego MSCP Conservation Area

The County of San Diego MSCP Conservation Areas "connect…biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened and endangered" (Ogden 1998, page 3-1).

The project site is not located within or adjacent to the County of San Diego Conservation Area (SANDAG 1997).

MSCP Core Biological Resource Areas and Linkages/Wildlife Corridors

The County of San Diego BMO, Section 86.508 defines a "Biological Resource Core Area" as "an integral component of a viable regional ecosystem". A "habitat linkage" or "wildlife corridor" is generally defined as "a specific route" or linear landscape feature utilized by resident or transient wildlife "for movement and migration" between two patches of habitat, which supports or contributes to the long-term movement of wildlife and genetic material.

The project site is not located within or adjacent to a generalized MSCP Core Biological Resource Area or Linkage (SANDAG 1996), and does not serve as a functional wildlife corridor.

Sensitive Habitats

Non-native grasslands have not typically been considered a sensitive habitat type; however, they would be considered sensitive if they were to support listed sensitive species or were of particular biological value to these species, or were to serve as significant raptor foraging habitat, providing a

good prey base and suitable hunting habitat for resident, wintering, and transient raptor populations. Although some raptors such as the red-tailed hawk (*Buteo jamaicensis*) and red-shouldered hawk (*Buteo lineatus*) may potentially occur within the project area, no raptor nests were observed in the eucalyptus trees and the slope adjacent to these trees is not expected to provide substantial foraging habitat based on the steep topography and urbanization of the area; therefore, the non-native grassland is not considered to be a sensitive habitat type on this project site.

Rare, Threatened, Endangered, Endemic and/or Sensitive Species or MSCP-Covered Species

The County of San Diego BMO, Section 86.508 defines "sensitive species" as:

(a) "Those species that are included on generally accepted and documented lists of plants and animals of endangered, threatened, candidate or of special concern by the Federal Government, or State of California."
(b) "Those species listed on Attachment C, Critical Populations of Sensitive Plant Species within the MSCP Subarea; Attachment D, Rare, Narrow Endemic Animal Species; Attachment E, Narrow Endemic Plant Species; Attachment K, San Diego County Vegetation Communities and Tier levels within the MSCP; and Sensitive Plant Species as defined by this Chapter."
(c) "Those species that meet the definition of "Rare or Endangered Species" under Section 15380 of the State CEQA Guidelines."

Table 3 summarizes the presence and/or potential for occurrence of rare, endangered, endemic, and/or sensitive species or MSCP-covered species (based on the habitat present, site eco-region, elevation, soils/substrate, and topography) within the study area.

Sensitive Flora

Sensitive plant species included in this report are those listed by the USFWS (1999 and 2005b), CDFG (2005b), County of San Diego BMO, and California Native Plant Society (CNPS) (2001). No sensitive plant species were identified on the project site during the biological survey. Those species expected but not observed are discussed in Table 3.

Sensitive Fauna

Sensitive animal species included in this report are those listed by the USFWS (1999 and 2005a), CDFG (2005a), and County of San Diego BMO. No sensitive animal species were identified on the project site during the biological survey. Those species expected but not observed are discussed in Table 3.

MSCP-Covered Species

MSCP-covered species include species federally- or state-listed as endangered or threatened, as well as currently unlisted species that are considered "adequately conserved" under the regional plan based on the "… preserve configuration, vegetation community conservation targets for all subareas, and implementation of habitat management plans" (Ogden 1998, page 3-22 and County of San Diego 1997, Attachment 1).

No MSCP-covered species were identified on the project site during the biological survey.

Table 3. Summary of Rare, Threatened, Endangered, Endemic and/or Sensitive Species, and MSCP Covered Species with a Potential to Occur on the Project Site

Scientific Name	Common Name	Habitat	Sensitivity Listings[1]	MSCP Status	Status/Occurrence Potential On Project Site
Plants					
Ceanothus cyaneus	Lakeside Ceanothus	Closed-cone coniferous forest, chaparral; Elevation 500 – 3000 feet; Shrub (evergreen); Blooms February-March	Fed: none State: none CNDDB: List 1B	County List A	Low Potential; The site generally lacks suitable habitat due to abundance of non-native grassland occurring amongst southern mixed chaparral
Horkelia truncata	Ramona Horkelia	Chaparral, cismontane woodland/clay; Elevation 1000 – above 3000 feet; Perennial herb; Blooms May-June	Fed: none State: none CNDDB: List 1B	County List A	Low Potential; The site generally lacks suitable habitat due to the abundance of non-native grassland occurring amongst southern mixed chaparral and the lack of clay soils
Machaeranthera juncea	Rush-like Bristleweed	Chaparral, coastal scrub; Elevation 1000 – 3000 feet; Perennial herb; Blooms June-January	Fed: none State: none CNDDB: List 4	County List D	Moderate Potential; Records of this species from Alpine and occurring occasionally on dry hillsides
Monardella hypoleuca ssp. *lanata*	Felt-leaved Monardella	Chaparral, cismontane woodland; Elevation 1000 – greater than 3000 feet; Perennial herb (rhizomatous); Blooms June-August	Fed: none State: none CNDDB: List 1B	County List A	Low Potential; The site generally lacks suitable habitat; typically found beneath mature stands of chamise and in gabbroic soils

Invertebrates					
Euphydryas editha quino	Quino Checkerspot	Open grassland and openings within shrub habitats that support dwarf plantain (*Plantago erecta*)	Fed: FE State: none	County Group A	Low Potential; Based on the presence of recovering chaparral indicator species, it is likely that the slope adjacent to the proposed site was comprised of chaparral habitat pre-fire. The site is located within the USFWS recommended survey area (USFWS 2002) with historical records (1986-2003) of the species documented approximately 2 miles south of the I-8 freeway/project site (USFWS 2003)
Lycaena hermes	Hermes Copper	Openings in chaparral, associated with the larval host plant Spiny Redberry (*Rhamnus crocea*), adults feed on nectar from Flat-top Buckwheat	Fed: none State: none	County Group A	Low Potential; The site generally lacks suitable habitat due to the lack of larval host plants
Reptiles					
Aspidoscelis tigris stejnegeri	Coastal Western Whiptail	Coastal Sage Scrub, chaparral, and grasslands	Fed: none State: CSC	County Group B	Moderate Potential; The site has some open areas of non-native grassland amongst the southern mixed chaparral
Lichanura trivirgata roseofusca	Coastal Rosy Boa	Rocky outcrop areas within chaparral and sage scrub	Fed: FSC State: none	County Group B	High Potential; The site has a high amount of rock outcrops interspersed amongst the non-native grassland and southern mixed chaparral
Crotalus ruber ruber	Northern Red Diamond Rattlesnake	Occupies rocky outcrops and areas of heavy brush or rugged terrain in chaparral, sage scrub, or desert scrub on both coastal and desert slopes, usually below 4000 feet	Fed: none State: CSC	County Group B	High Potential; The site has a high amount of rock outcrops interspersed amongst the non-native grassland and southern mixed chaparral

Coleonyx variegatus abbottii	San Diego Banded Gecko	Areas of rock outcrop within sage scrub and chaparral	Fed: none State: none	County Group A	High Potential; The site has a high amount of rock outcrops interspersed amongst the non-native grassland and southern mixed chaparral
Phrynosoma coronatum blainvillei	Coast Horned Lizard	Chaparral, sage scrub, oak woodlands, and grasslands; sometimes occurs along seldom used dirt roads where native ant species are prevalent	Fed: non State: CSC	County Group B	Moderate Potential; The site has some open areas of non-native grassland amongst the southern mixed chaparral
Birds					
Aimophila ruficeps canescens	Rufous-crowned Sparrow	Rocky hillsides supporting sparse, low scrub or chaparral, sometimes mixed with grass	Fed: FSC State: CSC	County Group A	High Potential; This species is known to nest in non-native grasslands and is known to occur in chaparral (burned and non-burned) and rock outcrops
Aquila chrysaetos	Golden Eagle	Nests in cliffs (or trees), found in generally mountainous or hilly terrain; forages in grasslands, deserts, and shrubby habitats	Fed: none State: CSC, Fully Protected	County Group A	Low Potential; The site generally lacks suitable habitat to support nesting but may provide some foraging habitat
Polioptila californica californica	Coastal California Gnatcatcher	Various successional stages of sage scrub	Fed: FT State: CSC	County Group A	Not Expected; The site and adjacent areas lack potential suitable sage scrub habitat and no CNDDB/USFWS records are recorded in the project vicinity.
Mammals					
Antrozous pallidus	Pallid Bat	Uses open forest and grassland habitats for feeding and multiple habitats for roosting	Fed: none State: CSC	County Group B	Low Potential; The site generally lacks suitable habitat
Bassariscus astutus	Ringtail	Chaparral or forested habitat in close association with rock outcrops and riparian habitat	Fed: none State: none	County Group B	Low Potential; Although the site supports extensive rock outcrops, there are no riparian areas on-site

Corynorhinus townsendii	Townsend's Big-eared Bat	Cave rooster, feeds in forest/woodland habitats or along habitat edges within 15 km of roost site	Fed: FSC State: CSC	County Group B	Low Potential; The site generally lacks suitable habitat
Eumops perotis californicus	Greater Western Mastiff Bat	Extensive open areas with abundant roost locations in rock outcrops; found where oaks and chaparral occur	Fed: FSC State: CSC	County Group B	Low Potential; The site generally lacks suitable habitat
Felis concolor	Mountain Lion	Chaparral or woodland habitats with requisite areas of riparian vegetation and interspersions of rock outcrops and irregular terrain where deer are present	Fed: none State: none	County Group B	Low Potential; The site generally lacks suitable habitat
Myotis ciliobrum	Small-footed Myotis	Uses a variety of habitats, prefers open stands in forests/woodlands, brushy habitats, and riparian areas	Fed: FSC State: none	County Group B	Low Potential; The site generally lacks suitable habitat
Nyctinomops femorosaccus	Pocketed Free-tailed Bat	Cliff rooster, feeds in multiple habitats	Fed: none State: CSC	County Group B	Low Potential; The site generally lacks suitable habitat
Nyctinomops macrotis	Big Free-tailed Bat	Cliff rooster, prefers rugged, rocky canyons, feeds in multiple habitats, including over water	Fed: none State: CSC	County Group B	Low Potential; The site generally lacks suitable habitat
Odocoileus hemionus	Southern Mule Deer	Chaparral and open forest habitats with abundant edge and interspersed riparian habitat	Fed: none State: none	County Group B	Low Potential; The site generally lacks suitable habitat

[1]**Sensitivity Listings**

Federally-listed: FE = Federally-listed as Endangered; FT = Federally-listed as Threatened; FPE = Federally proposed for listing as Endangered; FPT = Federally proposed for listing as Threatened; FPD = Federally proposed for delisting; FC = Federal Candidate Species (former Category 1 candidates); FSC = Federal Species of Concern

State-listed: SE = State-listed as Endangered; ST = State-listed as Threatened; SCE = State candidate for listing as Endangered; SCT = State candidate for listing as Threatened; CSC = California Species of Concern; SR = California Rare Species; FP = California Fully Protected Species

California Native Plant Society (CNPS): List of Species Designation: 1B = Rare or endangered in California and elsewhere (meets CDFG criteria for rare or endangered listing); 2 = Rare or endangered in California, more common elsewhere; 3 = Plants about which more information is needed; 4 = Plants of limited distribution

County of San Diego: List/Group A = Plants rare, threatened or endangered in California and elsewhere; List/Group B = Plants rare, threatened or endangered in California but more common elsewhere; List C = Plants which may be quite rare, but need more information to determine their true rarity status; List D = Plants of limited distribution and are uncommon, but not presently rare or endangered

*Sensitivity status applies to nesting/wintering sites only (or burrow sites for the burrowing owl)

References: CDFG 2005; USFWS 2005 and 1999; County of San Diego BMO and Sensitive Plant/Animal List 2004; CNPS 2001

PROJECT IMPACT ANALYSIS

THRESHOLDS OF SIGNIFICANCE

CEQA guidelines (California Resources Agency 2005, §15064, §15064.7, and §15065) state that a project may have a "significant effect on the environment" if:

- "The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory."
- "The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals."
- "The project has possible environmental effects which are individually limited but cumulatively considerable."

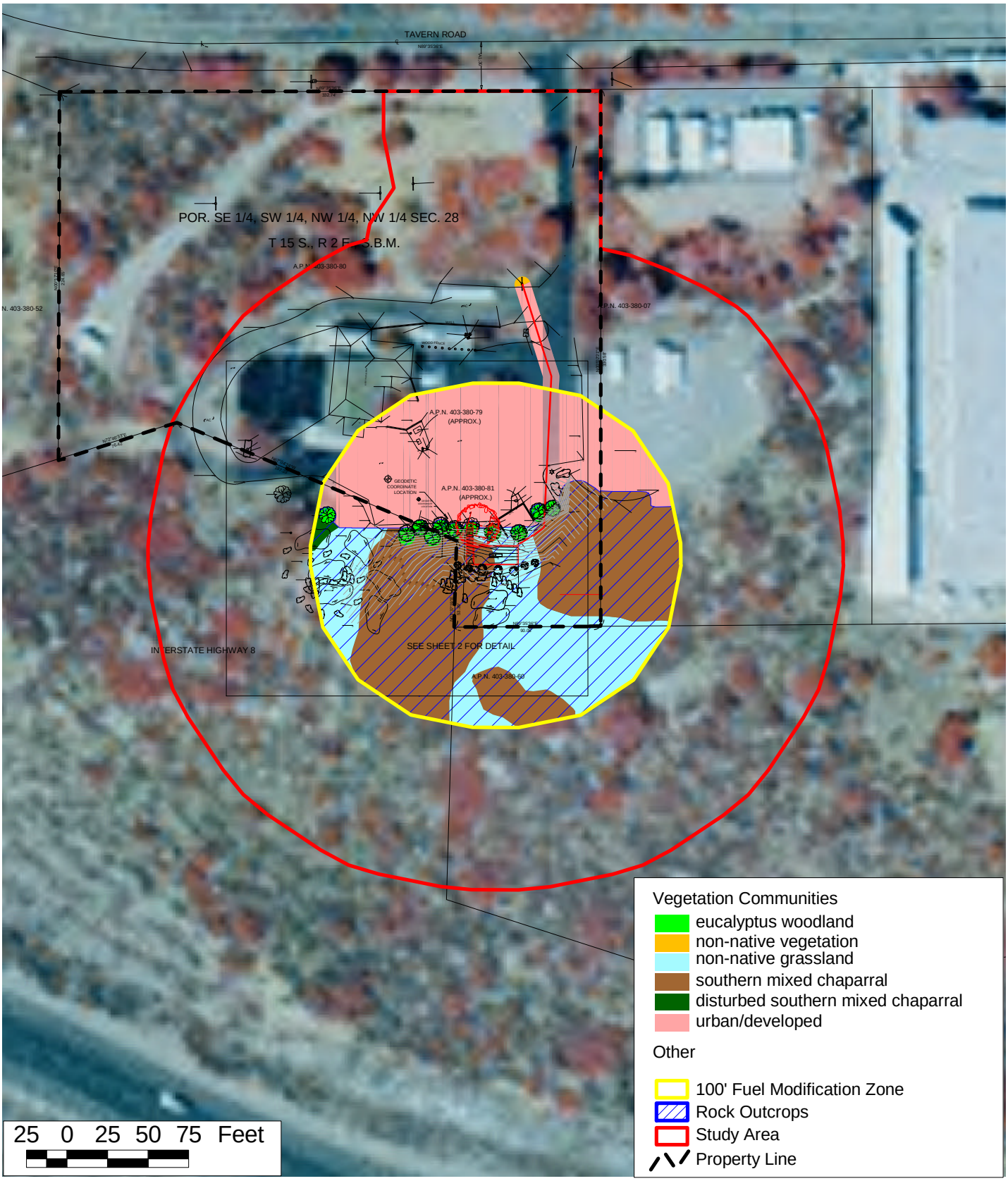
DIRECT IMPACTS

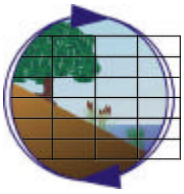
Direct impacts are defined under CEQA guidelines as "effects which are caused by the project and occur at the same time and place" and produce a temporary or permanent biologically significant, "physical change" in the environment (California Resources Agency 2005, §15358).

Impacts to nesting raptors would be considered significant per the Fish and Game Code (Fish and Game Code Division 4, Part 2, Chapter 1 Section 3503.5). The breeding season for hawks is typically between February 1st and July 31st. To ensure impact avoidance, direct impacts to the eucalyptus trees would occur between August 1st and January 1st. If construction cannot be scheduled outside of the breeding season, a qualified biologist would inspect the site for nests prior to construction. If an active raptor nest is located, no impacts would be allowed within 300 feet of the nest until all young have fledged.

Vegetation Community Direct Impacts

The proposed project would result in direct impacts to a portion of the southern mixed chaparral and non-native grassland present within the study area (Table 4, Figure 3). The CMU and mono-broadleaf faux tree would result in permanent, direct impacts to southern mixed chaparral, non-native grassland, approximately one to three eucalyptus trees, and existing urban/developed lands. Placement of the underground telco and power lines would be expected to result in temporary, direct impacts to non-native grassland, non-native vegetation, and existing urban/developed lands along an approximate 10-foot wide alignment from excavation of the trench. Maintenance of the fuel modification zone, at an anticipated radius of 100 feet around the equipment cabinets, would result in impacts to non-native grassland, southern mixed chaparral, urban/developed lands, and potentially a few eucalyptus trees.





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Biological Impacts Map

SS639-01 Veterans of Foreign Wars Hall
Cingular Wireless Project

Figure 3

Table 4. Summary of Vegetation Community Direct Impacts Resulting from the Proposed Project

Vegetation Type	**MSCP Tier Habitat Type**	**Acres (%) On-site**		**Acres (%) Impacted**		**Acres (%) Remaining**	
Southern Mixed Chaparral	Upland, Tier III	0.59	(17%)	0.35	(10%)	0.24	(7%)
Disturbed Southern Mixed Chaparral	Upland, Tier III	0.13	(4%)	<0.01	(<1%)	0.13	(4%)
Non-Native Grassland	Upland, Tier III	1.27	(37%)	0.21	(6%)	1.06	(31%)
Eucalyptus Woodland	Upland, Tier IV	0.02	(<1%)	0.02	(1%)	0.00	(0%)
Non-Native Vegetation	Upland, Tier IV	0.46	(13%)	<0.01	(<1%)	0.46	(13%)
Urban/Developed Lands	Upland, Tier IV	1.00	(29%)	0.33	(9%)	0.67	(19%)
	Total:	**3.47**	**(100%)**	**0.91**	**(26%)**	**2.56**	**(74%)**

Impacts to MSCP Tier IV habitat types (*e.g.*, the eucalyptus woodland, non-native vegetation, and urban/developed lands) would not be significant under the County of San Diego MSCP Subarea Plan.

Although southern mixed chaparral and non-native grassland are not considered to be a sensitive habitat types on this project site, impacts to these vegetation categories would be considered significant under the County of San Diego MSCP Subarea Plan; however, implementation of Project Mitigation Measures 1 and 2 would reduce impacts to a level below significance.

INDIRECT IMPACTS

Indirect impacts are defined under CEQA guidelines as "effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable" and produce a temporary or permanent biologically significant, "physical change" in the environment (California Resources Agency 2005, §15358).

The disturbance/clearing of vegetation could result in conditions suitable for non-native, weedy species intrusion. This potential impact is not expected to substantially change the existing conditions of the project site; and therefore, would not be significant under the County of San Diego MSCP Subarea Plan.

As recommended by the USFWS Interim Guidelines for Avoiding Bird Collisions at Communication Towers (USFWS 2000), the Cingular® wireless facility site is proposed adjacent to an existing "antenna farm" and the proposed 50-foot high, mono-broadleaf faux tree is expected to blend in with the existing surroundings. Based on this proposed project design, and due to the lack of substantial raptor foraging habitat or water sources near the site, potential indirect impacts to raptors and/or migratory birds from communication tower collisions is not expected to be significant under the County of San Diego Subarea Plan. However, Project Mitigation Measure 4 is recommended to further minimize potential attraction to the tower from indirect lighting impacts around the facility.

CUMULATIVE IMPACTS

Cumulative impacts are defined under CEQA guidelines as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (California Resources Agency 2005, §15355).

The MSCP was designed to compensate for the loss of biological resources throughout the program's region; therefore, projects that conform to the MSCP, as specified in the County of San Diego MSCP Subarea Plan, RPO and BMO, would not result in cumulatively considerable impacts for those biological resources adequately covered by the program. The aforementioned direct and indirect impacts resulting from the proposed project should not be cumulatively considerable if the project mitigation measures are implemented to ensure conformance the County of San Diego MSCP Subarea Plan, RPO, and BMO.

MITIGATION MEASURES

1. Prior to construction, orange fencing should be installed along the perimeter of the fuel modification zone and construction crews should be made aware that grading should not occur beyond this fencing.

2. Impacts to non-native grassland and southern mixed chaparral shall be mitigated through the off-site purchase of Tier III habitat in a biological resource core area at a 0.5:1 replacement ratio, or outside of a biological resource core area at a 1:1 replacement ratio. The mitigation site shall be located within the County of San Diego MSCP Subarea.

3. Any project landscaping should not include invasive non-native plant species, which are able to proliferate and aggressively alter or displace indigenous biological communities, as indicated in the California Exotic Pest Plant Council (CalEPPC) List of Exotic Pest Plants of Greatest Ecological Concern in California.

4. Any lighting associated with the facility should be down-shielded to keep light within the boundaries of the site to protect wildlife from the potential adverse effects of night lighting.

5. To ensure impact avoidance to nesting raptors, Construction should occur between August 1st and January 1st. If construction cannot be scheduled outside of the breeding season, a qualified biologist would inspect the site for nests prior to construction. If an active raptor nest is located, no impacts would be allowed until all young have fledged.

6. Timing of construction will be considered when scheduling work to minimize soil disturbing activities and major grading operations during the rainy season. Construction activities shall be planned and performed to minimize the area and duration of exposure of soil to erosion by wind, rain, runoff, and vehicles.

Implementation of the aforementioned Project Mitigation Measures should reduce biological impacts to a level below significance, and ensure conformance to the County of San Diego MSCP Subarea Plan, RPO, and BMO.

If you have any questions concerning this biological letter report, please do not hesitate to contact me at (858) 560-5465.

Sincerely,

Roland A. Sosa
Lead Biologist/Project Manager

Bonnie L. Peterson
County Certified Biologist

REFERENCES

American Ornithologists' Union. 2004. Forty-Fifth Supplement to the American Ornithologists' Union *Check-list of North American Birds*. Auk 121(3): 985-995.

_____. 1998. Check-list of North American Birds, 7th ed. American Ornithologists' Union, Washington D.C.

Baldwin, B. G., S. Boyd, B. J. Ertter, D. J. Keil, R. W. Patterson, T. J. Rosatti, and D. H. Wilken. 2004. Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California. Jepson Flora Project, Jepson Online Interchange. Regents of the University of California. <http://ucjeps.berkeley.edu/interchange/I_status_1+2.html>. Accessed 19 October 2005.

Bowman, R. H., A. A. House, G. Kester, D. D. Estrada, J. K. Wachtell, G. L. Anderson, P. V. Campo, R. E. Bishop, R. W. Griffin, and M. L. Jones. 1973 December. Soil Survey, San Diego Area, California. U.S. Department of Agriculture, Soil Conservation Service and Forest Service, in cooperation with the University of California Agricultural Experiment Station, U.S. Department of the Interior, Bureau of Indian Affairs, Department of the Navy, United States Marine Corps. Part I, 104 pp., Part II, 118 pp., + appendices + maps.

California Department of Fish and Game. 2005a July. Natural Diversity Database: Special Animals. 53 pp. <http://www.dfg.ca.gov/whdab/pdfs/SPAnimals.pdf>. Accessed 19 October 2005.

_____. 2005a July. Natural Diversity Database: Special Vascular Plants, Bryophytes, and Lichens List. Quarterly publication, Mimeo. 87 pp. <http://www.dfg.ca.gov/whdab/pdfs/SPPlants.pdf>. Accessed 19 October 2005.

_____. 2004. Natural Diversity Database. Rare Find Version 3.0.3. 2004 data.

California Native Plant Society (CNPS). 2001. Inventory of Rare and Endangered Plants of California. 6th edition. Rare Plant Scientific Advisory Committee. David P. Tibor, convening editor. Sacramento, California. X+ 388 pp.

California Resources Agency. 2004 September 7. CEQA, The California Environmental Quality Act, Guidelines. Cooperative effort among the California Resources Agency, its programs CERES and LUPIN, and the Governor's Office of Planning and Research. <http://ceres.ca.gov/topic/env_law/ceqa/guidelines/>. Accessed 19 October 2005.

_____. 2005 January 1. CEQA, The California Environmental Quality Act, Statute. Cooperative effort among the California Resources Agency, its programs CERES and LUPIN, and the Governor's Office of Planning and Research. <http://ceres.ca.gov/topic/env_law/ceqa/stat/>. Accessed 19 October 2005.

County of San Diego. 2004 April 23. Biological Mitigation Ordinance. 17pp. + attachments A through M. Amended.

_____. 2002 June 4. Biological Resource Mapping Requirements. Department of Planning and Land Use. 11 pp. <http://www.sdcounty.ca.gov/dplu/Resource/docs/3~pdf/BioMapReq.pdf>. Accessed 19 October 2005.

_____. 1997 October 22. County of San Diego Multiple Species Conservation Program, Subarea Plan. 4 Sections + appendices. Prepared in conjunction with the U.S. Fish and Wildlife Service and California Department of Fish and Game.

_____. 1991 October 10. Resource Protection Ordinance. 16pp.

_____. Biological Survey Guidelines, Attachment D. Department of Planning and Land Use. 8pp. <http://www.sdcounty.ca.gov/dplu/Resource/3~procguid/3~procguid.html#ceqa>. Accessed October 2004.

Crother, B. I., J. Boundy, J. A. Campbell, K. De Quieroz, D. Frost, D. M. Green, R. Highton, J. B. Iverson, R. W. McDiarmid, P. A. Meylan, T. W. Reeder, M. E. Seidel, J. W. Sites, Jr., S. G. Tilley, and D. B. Wake. 2003. Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico: Update. Herpetological Review 2003, 34(3), 196-203.

Crother, B. I. (ed.). 2001. Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in Our Understanding. SSAR Herpetological Circular 29.iii +82 pp.

Hickman, J. C., editor. 1993. The Jepson Manual, Higher Plants of California. University of California Press, Berkeley. 1400pp.

Holland, R. F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, The Resources Agency, Department of Fish and Game. Sacramento, California. 156 pp.

Oberbauer, T. 1996. Terrestrial Vegetation Communities in San Diego County Based on Holland's Descriptions. San Diego Association of Governments. San Diego, California. 7 pp.

Ogden, in conjunction with the Resource Agencies, Local Jurisdictions, and members of environmental, building and development communities. 1998 August. Final Multiple Species Conservation Program MSCP Plan. 8 sections + attachments.

San Diego Association of Governments (SANDAG). 1997. MSCP Multiple Habitat Planning Area (MHPA) Metadata. <http://www.sandag.org/resources/maps_and_gis/gis_downloads/downloads/metadata/mscpmhpa.html>.

_____. 1996 June 6. MSCP Biological Core and Linkage Areas Metadata. <http://www.sandag.org/resources/maps_and_gis/gis_downloads/downloads/metadata/mscpbcla.html>.

_____. 1970. San Diego Region Soils Metadata.

<http://www.sandag.cog.ca.us/resources/maps_and_gis/gis_downloads/downloads/metadata/soilsdoc.htm>.

U.S. Fish & Wildlife Service (USFWS). 2005a October. Animal Species of Concern. Sacramento Fish & Wildlife Office. <http://sacramento.fws.gov/es/spp_lists/animal_sp_concern.cfm>. Accessed 19 October 2005.

_____. 2005b October 18. Plant Species of Concern. Sacramento Fish & Wildlife Office. <http://sacramento.fws.gov/es/spp_lists/plant_sp_concern.cfm>. Accessed 19 October 2005.

_____. 2004. CFWO_2-03 represents March 2002 release (occurrence information for multiple species within jurisdiction of CFWO). Carlsbad Fish and Wildlife Office, GIS Mapping and Analysis Branch.

_____. 2000 August 31. The ABC's of Avoiding Bird Collisions at Communication Towers: The Next Steps. Albert M. Manville, II, Ph.D., Wildlife Biologist, Division of Migratory Bird Management, USFWS. <http://www.fws.gov/migratorybirds/issues/towers/abcs.html>. Accessed October 2005.

_____. 1999 December 31. Title 50-Wildlife and Fisheries; Part 17-Endangered and Threatened Wildlife and Plants. <http://endangered.fws.gov/50cfr_animals.pdf> and <http://endangered.fws.gov/50cfr_plants.pdf>. Accessed 19 October 2005.

U.S. Geological Survey. 1955. Alpine Quadrangle, California 7.5 Minute Series (Topographic). Denver, Colorado or Reston, Virginia. Photo Revised/Inspected 1988.

Wilson, D. E. and D. M. Reeder, eds. 1993. Mammal Species of the World. Smithsonian Institution Press. Washington, D. C. 1206 pp.

APPENDIX 1. FLORA SPECIES OBSERVED ON-SITE

Habitat Types:

Southern Mixed Chaparral = SMC
Disturbed Southern Mixed Chaparral = DIS
Non-Native Grassland = NNG
Eucalyptus Woodland = EUC
Non-Native Vegetation = NNV
Urban/Developed Lands = URB

* = Denotes non-native flora species.

Scientific Name	Common Name	Habitat
DICOTYLEDONS		
Aizoaceae – Fig-Marigold Family		
**Carpobrotus edulis* (L.)N.E. Brit.	hottentot-fig	NNV
Anacardiaceae - Sumac Family		
Malosma laurina (Nutt.)Abrams	laurel sumac	SMC
Asteraceae - Sunflower Family		
Baccharis sarothroides Gray	broom baccharis	SMC, NNV
**Centaurea melitensis* L.	tocalote	NNG
Conyza canadensis (L.) Cronquist	horseweed	NNV
Encelia californica Nutt.	California encelia	DIS
Gutierrezia californica (DC.)Torrey & Gray	broom matchweed	DIS
Heterotheca grandiflora Nutt.	telegraph weed	SMC
Stephanomeria diegensis Gottlieb	San Diego wreath-plant	SMC
Brassicaceae - Mustard Family		
**Brassica nigra* (L.)Koch	black mustard	NNG
Cactaceae - Cactus Family		
Opuntia sp.	prickly-pear	NNG
Cucurbitaceae - Gourd Family		
Marah macrocarpus (Greene)Greene var. *macrocarpus*	wild-cucumber	NNG
Ericaceae - Heath Family		
Xylococcus bicolor Nutt.	mission manzanita	SMC
Hydrophyllaceae - Waterleaf Family		
Phacelia sp.	phacelia	SMC
Lamiaceae - Mint Family		
Salvia apiana Jeps.	white sage	SMC
Myrtaceae - Myrtle Family		
**Eucalyptus* sp.	Eucalyptus	EUC, NNV, DIS
Polygonaceae - Buckwheat Family		
Eriogonum fasciculatum Benth. var. *foliolosum* (Nutt.)S. Stokes	interior flat-top buckwheat	SMC
Rhamnaceae - Buckthorn Family		
Ceanothus tomentosus Parry	Ramona ceanothus	SMC
Rosaceae - Rose Family		
Adenostoma fasciculatum Hook & Arn.	chamise	SMC
Rutaceae - Rue Family		

Scientific Name	Common Name	Habitat
Citrus sp.	orange tree	DIS
Solanaceae - Nightshade Family		
**Nicotiana glauca* Graham	tree tobacco	NNV
MONOCOTYLEDONS		
Poaceae - Grass Family		
**Avena barbata* Link	slender wild oat	NNG
**Bromus madritensis* L. ssp. *rubens* (L.)Husn.	red brome	NNG
**Pennisetum setaceum* (Forssk.) Chiov.	fountain grass	NNG

APPENDIX 2. FAUNA SPECIES OBSERVED OR DETECTED ON-SITE

Habitat Types:

Southern Mixed Chaparral = SMC
Disturbed Southern Mixed Chaparral = DIS
Non-Native Grassland = NNG
Eucalyptus Woodland = EUC
Non-Native Vegetation = NNV
Urban/Developed Lands = URB

Abundance Codes:

A = Abundant: Almost always encountered in moderate to large numbers in suitable habitat and the indicated season.

C = Common: Usually encountered in proper habitat at the given season.

U = Uncommon: Infrequently detected in suitable habitat. May occur in small numbers or only locally in the given season.

R = Rare: Applies to species that are found in very low numbers.

'Numbers' indicate the number of individuals observed during the recent survey work.

Status Codes (birds only):

M = Migrant: Uses the site for brief periods of time, primarily during the spring and fall months.

R = Year-round resident: Probable breeder on-site or in the vicinity.

S = Spring/summer resident: Probable breeder on-site or in the vicinity unless combined with transient status.

T = Transient: Uses site irregularly in summer but unlikely to breed. Not a true migrant and actual status often poorly known.

W = Winter visitor: Does not breed locally.

V = Casual vagrant: Not expected; out of normal geographic or seasonal range and by definition rare.

* = denotes introduced species

Common Name	Scientific Name	Habitat	Abundance	Status
BIRDS				
Corvidae (Jays, Magpies, and Crows)				
western scrub-jay	*Aphelocoma californica*	SMC	C	R
American crow	*Corvus brachyrhynchos*	SMC	A	R
Emberizidae (Sparrows, Blackbirds and Relatives)				
California towhee	*Pipilo crissalis*	SMC	C	R
MAMMALS				
Leporidae (Rabbits and Hares)				
rabbit	*Sylvilagus* sp.	SMC, NNG	---	---