R·E·C Consultants, Inc.
Civil Engineering · Environmental

2442 Second Avenue
San Diego, CA 92101
Phone: 619.232.9200
Fax: 619.232.9210

June 26, 2007

Debra DePratti Gardner
Mitchell J. Architecture
4883 Ronson Court, Suite N
San Diego, CA 92111

Subject: Biological Letter Report for the Nextel Engineer Springs Site

Dear Ms. Depratti Gardner:

The proposed project consists of constructing a 0.26-acre cellular antenna site which is located on a larger 16 acre property. This letter report describes the biological resources of the 0.26-acre project footprint as well as the 16 acre site, identifies proposed impacts to these resources, and offers mitigation measures that reduce impacts to below a level of significance.

Introduction

The 0.26-acre project is located on a 16 acre parcel off of Arnoldo Road, in Dulzura, San Diego County, California. The site is located within the Metro-Lakeside-Jamul segment of the Multiple Species Conservation Program (MSCP) County Subarea and is subject to the requirements of the Biological Mitigation Ordinance (BMO).

The 16 acre parcel is made up of a moderately sloping site that rises from the northern portion of the site where it is relatively level to a peak near the existing pad. From the pad, the site gently falls towards the south. Elevations onsite range from 1375 feet above mean sea level on the northwestern edge of the property to 1700 feet above mean sea level on the southeastern portion of the property near the existing pad. There are two soil types that are present onsite. The dominant type is Cieneba rocky coarse sandy loam (9-30%). There is a small section of Visalia sandy loam (5 to 9%) located in the southwestern portion of the site.

The 16 acre parcel currently supports one single family residence and a graded pad that has had a trailer parked on it. To the west and south of the site are single family residences. To the east is an area that has vehicles parked on it and additional residences. To the north is undeveloped land.

Methods

Biological resources of the 16 acre Swift property were investigated through field reconnaissance and literature review. Table 1 summarizes the surveys conducted onsite by REC biologists. The site was surveyed for plants and animals via intensive surveys.

Wildlife was identified directly by sight or vocalizations and indirectly by scat, tracks, or burrows. Plant species were identified in the field or collected for later identification. Field notes were maintained throughout the surveys, and species of interest were mapped. Surveys focused on sensitive plant and wildlife species, but all species observed were noted. All onsite habitats were recorded, and the presence or absence of suitable habitat for sensitive species was documented. REC biologist Victor Novik conducted a Quino checkerspot butterfly (*Euphydryas editha quino)* habitat assessment of the property.

Mapping of vegetation on the project was performed on an aerial photograph scaled at 1 inch equals 200 feet. Locations of rare or sensitive plant and wildlife species were also mapped.

Table 1
Surveys Conducted on the Nextel Engineer Springs Site

Date	Time	Temp F	Sky	Wind	Survey	Personal
7/8/04	N/A	N/A	N/A	N/A	General	Victor Novik
2/3/05	1000 to 1110	66	Clear	4-8	QCB Assessment	Victor Novik
3/23/05	0950 to 1205	Cool	Overcast	Breezy	Rare Plant	Catherine MacGregor
5/16/05	1330 to 1530	Warm	Sunny to hazy	warm	Rare Plant	Catherine MacGregor

Scientific nomenclature and common names for animal species in this report follow American Ornithological Union (AOU 2000) for birds, Stebbins (2003) for reptiles and amphibians, SDNHM (1997) for mammals, and Powell (1979) for insects. Scientific nomenclature for plants follows Hickman et al. (1996) as updated by Simpson and Rebman (2001).

Existing Conditions

Vegetation

The 16 acre parcel contains two habitat types as classified according to Holland (1986) and Oberbauer (1996): southern mixed chaparral and developed (Figure 3). One hundred twenty five plant species were identified onsite during the survey. Ninety eight (78 percent) are native to southern California and twenty seven (22 percent) are non-native. Appendix A lists of all the plant species observed onsite.

Within the footprint of the proposed cellular antenna project, only one habitat type occurs: southern mixed chaparral. This habitat is comprised of scleropyhllous shrubs that are five to nine feet in height, forming a dense community. There are occasionally patches of bare soil in this habitat. This community is associated with areas of low precipitation. Southern mixed chaparral is adapted to fires, with many of the plants responding by stump sprouting. In the years following fires, the undergrowth will be

thick. In more mature stands there may be little to no undergrowth. The dominant plant species in the southern mixed chaparral onsite are chamise (*Adenostoma fasciculatum*), mission manazanita (*Xylcoccus bicolor*), and laurel sumac (*Malosma laurina*).

Wildlife

Wildlife species observed on the 16 acre site were typical of those found in southern mixed chaparral, and are described below.

Onsite, there were a variety of insect species that included many butterflies. Observed butterfly species include painted lady (*Vanessa cardui*), west coast lady (*Vanessa annabella*) unidentified lady species (*Vanessa* sp.), and unidentified white species. Moths were also very abundant onsite.

There is a low potential for breeding and burrowing by amphibians to occur onsite. There are no drainages onsite. No amphibians were observed onsite during the survey.

There is a high potential for reptile species to use the site to forage. Fairly common species, such as the common side-blotched lizard (*Uta stansburiana*) were observed onsite.

A number of bird species were detected onsite. These included California towhee (*Pipilo crissalis*), meadow lark (*Sturnella neglecta*), California quail (*Callipepla californica*), wrentit (*Chamaea fasciata*), song sparrow (*Melospiza melodia*), common raven (*Corvus corax*), bushtit (*Psaltriparus minimus*), and turkey vulture (*Cathartes aura*).

One mammal was detected onsite: wood rat (*Neotoma* sp.). There were many burrows throughout the site that may have been utilized by a variety of rodents.

Sensitive Resources

Sensitive or special interest plant and wildlife species and habitats are those, which are considered rare, threatened, or endangered within the state of region by local, state, or federal resource conservation agencies. Sensitive habitats, as identified by these same groups, are those which generally support plant or wildlife species considered sensitive by these resource protection agencies or groups. Sensitive species and habitats are so called because of their limited distribution, restricted habitat requirements, particular susceptibility to human disturbance, degradation due to development or invasion by non-native species, or a combination of all of these factors. Sources used for the determination of sensitive biological resources include: County of San Diego (1991, 1997, 2000), USFWS (USFWS 2006), California Department of Fish and Game (CDFG) (CDFG, 2006), and California Native Plant Society (CNPS 2001, 2006).

Assessments for the potential occurrence of sensitive or listed species are based upon known ranges and habitat preferences for the species, and species occurrence records from the California Natural Diversity Database.

The County of San Diego considers the southern mixed chaparral habitat onsite to be sensitive. Approximately 0.26-acre of this habitat occurs in the project footprint.

One sensitive plant was observed onsite during the surveys: San Diego sunflower. This species is not a state or federally listed species; however, it is considered sensitive to the County of San Diego and by the California Native Plant Society (CNPS 2001). San Diego sunflower, a shrub in the aster family, is a CNPS List 4 species with a R-E-D ranking of 1-2-1 and no state or federal status and a County Group D species. Habitat includes chaparral. Threats to this species include development. On the 16 acre site, several hundred plants were found south of the existing pad on the south facing slope.

Although no formal listing status occurs for the raptor species observed onsite, all raptors are protected under CDFG Code 3503. Therefore, the red-tailed hawk (*Buteo jamaicensis*) and turkey vulture (*Cathartes aura*) would be considered sensitive.

The 16 acre project site is located within the protocol survey area for the Quino checkerspot butterfly, a Federally endangered and a County MSCP narrow endemic species. Additionally, the County requested that the site be assessed for Quino checkerspot butterfly habitat. The site was assessed by REC biologist Victor Novik. The southern mixed chaparral onsite is very dense and contained very few open areas. Quino prefer open patches within coastal sage scrub that contain dot seed plantain (*Plantago erecta*) and nectar sources including goldfields (*Lasthenia* spp.). No Quino were observed onsite. Additionally, the survey did not reveal preferred host or nectar sources for this species. There is a low potential for Quino to utilize this site due to the nearly 100% canopy cover by the southern mixed chaparral habitat.

Regulatory Requirements

The State of California passed the Natural Communities Conservation Planning (NCCP) Act in 1991. The NCCP is broader in its orientation and objectives than the California and Federal Endangered Species Acts. These laws are designed to identify and protect individual species that have already declined significantly in number. The objective of the NCCP is to conserve natural communities and accommodate compatible land use. The pilot program is a cooperative effort between the state and federal governments and numerous private partners.

For planning purposes, some of these sub-regions are organized into "Subareas" that correspond to geographic boundaries of participating jurisdictions and/or landowners. In each subregion and subarea, a local lead agency coordinated the collaborative planning process. Working with landowners, environmental organizations, and other interested parties, the local agency oversees the numerous activities that compose the development of a conservation plan. The CDFG and the USFWS provide the necessary support, direction, and guidance to NCCP participants in these functions. The County of San Diego is participating in the NCCP and already has a Multiple Species Conservation Plan (MSCP) in place for southern portions of the County (County of San Diego 1987). The

proposed project must comply with the MSCP Subarea Plan and its implementing document, the Biological Mitigation Ordinance.

Impact Analysis

Impacts to biological resources are classified as direct, indirect, or cumulative. Direct impacts are the result of project implementation, and usually include the loss of vegetation and sensitive habitats, the introduction of non-native species which may outcompete and displace the native vegetation, activity that may contribute to the mortality of wildlife, and fragmentation of wildlife corridors. Indirect impacts occur as a result of the increase in human encroachment in the natural environment and include; off-road vehicle use, harassment and or collection of wildlife and plant species, introduction of domestic pets which may harass and kill wildlife, and inadvertent deaths along roadsides. Cumulative impacts occur as a result of on-going direct and indirect impacts from unrelated projects. Cumulative impacts are assessed on a regional basis and determine the overall effect of numerous activities on a sensitive resource over a larger area.

The County of San Diego adopted the regional Multiple Species Conservation Program (MSCP) Subarea Plan in 1997. To implement the Subarea Plan the County adopted the Biological Mitigation Ordinance (BMO). These documents identify biological resources and thresholds for significance. Habitats are classified into Tier levels which require different levels of mitigation. Habitats within Tiers I, II, and III require mitigation under the BMO. Additionally the BMO groups sensitive plants into Groups A, B, C, and D which correspond to CNPS Lists 1 –4.

Direct Impacts

The proposed project consists of constructing a 0.26-acre cellular antenna facility. This will include the access road, actual facility, and fire clearing. Due to the location of the site additional lands are considered impacted by edge effect and noise from the air conditioning units associated with the facility. All of these impacts will be part of the project footprint.

The proposed project will impact 0.26-acre of southern mixed chaparral. Southern mixed chaparral is a Tier III habitat. The loss of this habitat would be considered significant to the County of San Diego and would require mitigation.

The project will also impact a population approximately 40 San Diego sunflowers (*Viguiera lacinata)* through grading and fire clearing. The loss of 40 plants is not considered significant as there are several hundred plants onsite. The purchase of habitat will ensure the long term sustainability of the population.

No direct impacts to sensitive animals are anticipated.

Indirect Impacts

Indirect impacts could occur as a result of the increase in human encroachment in the natural environment and might include increased noise, lighting impacts, off-road vehicle use, runoff, and increased amounts of trash that may facilitate the occurrence of pest animals in the area. Noise from the air conditioning units will not exceed 60dbh within in 50 feet of the north side of the trailer. This area has been considered impacted by the project. Therefore, no indirect impacts are expected to result from the cellular antenna facility.

Cumulative Impacts

Cumulative impacts on biological resources may occur due to the implementation of numerous projects within the same region. Since the impacts of a given project may prove to be significant when considered together with other past and present projects, and reasonably foreseeable future projects, it is important to consider the cumulative effects that regional growth may have on biological resources. Direct impacts to southern mixed chaparral habitat resulting from the implementation of the project will contribute to cumulative impacts to these resources in the region. However, the loss of southern mixed chaparral will be so small that the cumulative impact will be less than significant.

Mitigation

Under CEQA, the County's MSCP and BMO, mitigation is required for all significant biological impacts. These include, in order of preference: 1) avoidance of impacts, 2) minimization of impacts to the maximum extent practicable, and 3) mitigation, only if avoidance is not feasible and the impacts have been minimized. Whenever possible, the significant impact should be avoided using design alternatives, such as increasing development density in disturbed habitats while reducing or eliminating density in areas that support sensitive biological resources. If it is not feasible to avoid the impact due to either jurisdictional policy or to economic or topographic constraints, then minimizing of impacts should be considered. Impacts on significant resources should be minimized to the greatest extent feasible. Minimizing includes decreasing lot size, narrowing roadways, increasing buffer zones, etc. If unavoidable impacts to significant resources would still occur, a mitigation plan that would meet the requirements of the County MSCP and BMO would be required.

Impacts to biological resources are discussed below with corresponding mitigation and level of significance after mitigation. Table 2 summarizes each habitat, amount of impacts, ratios required, and proposed offsite mitigation.

Table 2
Summary of Project Impacts and Mitigation Measures

Habitat Type with Habitat Code	Impact Amount (Acres)	Mitigation Ratio	Total Mitigation Needed	Proposed Offsite Mitigation
Southern Mixed Chaparral (37120)	0.26	0.5:1	0.13	0.13
Total	**0.26**		**0.13**	**0.13**

Impacts to 0.26-acre of southern mixed chaparral will be mitigated at a ratio of 0.5:1. Therefore, 0.13 acre of southern mixed chaparral shall be provided as mitigation for project impacts. This mitigation shall be purchased offsite in a pre-approved mitigation bank.

This mitigation will reduce project impacts to below a level of significance and ensure that the project complies with the BMO and MSCP.

If you have any questions, please call me at (619) 232-9200 extension 21.

Sincerely,

Victor Novik
Senior Biologist

Elyssa Robertson
Principal