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Mr. Jerry Gaughan, Project Manager
JG Real Properties Consulting, Inc.
3940 Hortensia Street
San Diego, Ca. 92110

September 28, 2012

RE: Directed RPO Wetland Survey for the T&R Mini-Storage Project, 3300 05-052 (MUP): P05-052

Dear Jerry:

This report presents the results of a directed Resource Protection Ordinance (RPO) wetland survey of the T&R Mini-Storage Project, 3300 05-052 (MUP): P05-052. The subject project site is located northwest of the intersection of Nutmeg Street and North Centre City Parkway in the unincorporated San Diego County north of Escondido (Figure 1).

In order to conduct a directed RPO wetland survey of the T&R Mini-Storage Project site, I visited the subject property on January 6, 2012. Weather conditions were suitable for surveying, with clear skies, temperatures in the low 60's, and no measurable wind. The onsite and adjacent offsite drainage areas were examined for the presence of RPO wetland indicators in order to determine their exact limits. Transects were established at 100' intervals along the length of the drainages, where possible, in order to map wetland limits. The results of that mapping are illustrated on the attached RPO Wetland Exhibit. (Figure 2).

Definitions - County of San Diego RPO Wetland

In 2007, the County of San Diego revised its definition of an "RPO wetland". The previous RPO definition was much more inclusive; under the revised definition, many areas that had been considered County wetlands were no longer defined as such pursuant to the revised RPO.

The County's 2007 RPO defines "Wetlands" as follows.

- (1) *Lands having one or more of the following attributes are "wetlands":*
 - (aa) *At least periodically, the land supports a predominance of 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.*
- (2) *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.*
- (bb) Lands that have been degraded by past legal land disturbance activities, to the point that they meet the following criteria as determined by the Director of Planning and Land Use:*
 - (i) Have negligible biological function or value as wetlands even if restored to the extent feasible; and,*
 - (ii) Do not have substantial or locally important populations of wetland dependent sensitive species.*

Results – RPO Wetland Survey

None of the onsite drainages are mapped as U.S.G.S. “blue-line” watercourses. This suggests that, from a regional perspective, they are all relatively minor water features.

The primary drainage examined during this survey runs through the center of the site from roughly southwest to northeast. The floodway of this drainage is deeply incised in a narrow but natural channel with abutting areas supporting dense mixed chaparral vegetation. There are a few openings in the chaparral – these support small patches of riparian scrub vegetation. The eastern end of the drainage descends a small rocky slope. This area supports hydrophytic non-vascular plants, such as algae and moss, which grow on the thin soils associated with the exposed, rocky streambed. This primary drainage qualifies as an RPO wetland under Section 1 (cc) above.

Two other drainage systems are found onsite. The first, at the southern edge of the property, is essentially an upland swale which descends the steep slope, draining in a southerly direction to offsite areas. The second is a shallow system located at the northern end of the property that forms a confluence offsite to the east. This drainage appears to be primarily an old erosional feature from when this section of the property was graded many decades ago. The above drainages **do not** qualify as supporting RPO wetlands because they do not meet any of the criteria in the County’s 2007 RPO wetland definition, as follows:

- The areas **do not** support a predominance of plants whose habitat is water or very wet places. The vegetation in these locations consists of native upland species, as described above.
- The areas **do not** support a substratum is predominantly undrained hydric soil. These locations appear to support well-drained loam soils.
- The areas **do not** consist of an ephemeral or perennial stream whose substratum is predominately non-soil. As mentioned, these locations appear to support well-drained loam soils.

Conclusions

The County generally requires a minimum 50-foot buffer adjoining all RPO wetlands. The subject project will not impact any of the onsite drainage features. Furthermore, the development as proposed is well-removed from the RPO wetland within the central drainage. A minimum 50-foot buffer is available all along the edge of the drainage. A biological open space easement (BOSE) will be placed over the drainage

at the time the project obtains County approvals. Avoiding impacts to the onsite drainages will also avoid the need for regulatory agency permits.

Thank you for the opportunity to provide this focused study. Please contact me should you need further information or clarification.

Sincerely

A handwritten signature in black ink, appearing to read "Vincent N. Scheidt". The signature is stylized with a large loop at the end.

Vincent N. Scheidt, MA
Certified Biological Consultant

Attachments: Figure 1. Site Location
Figure 2. Wetland Exhibit on Site Plan showing RPO and Non-RPO Wetlands and Waters

Figure 1. Site Location – The T&R Mini-Storage Project
Portion of the U.S.G.S. "Valley Center, California" 7.5' Quadrangle Map

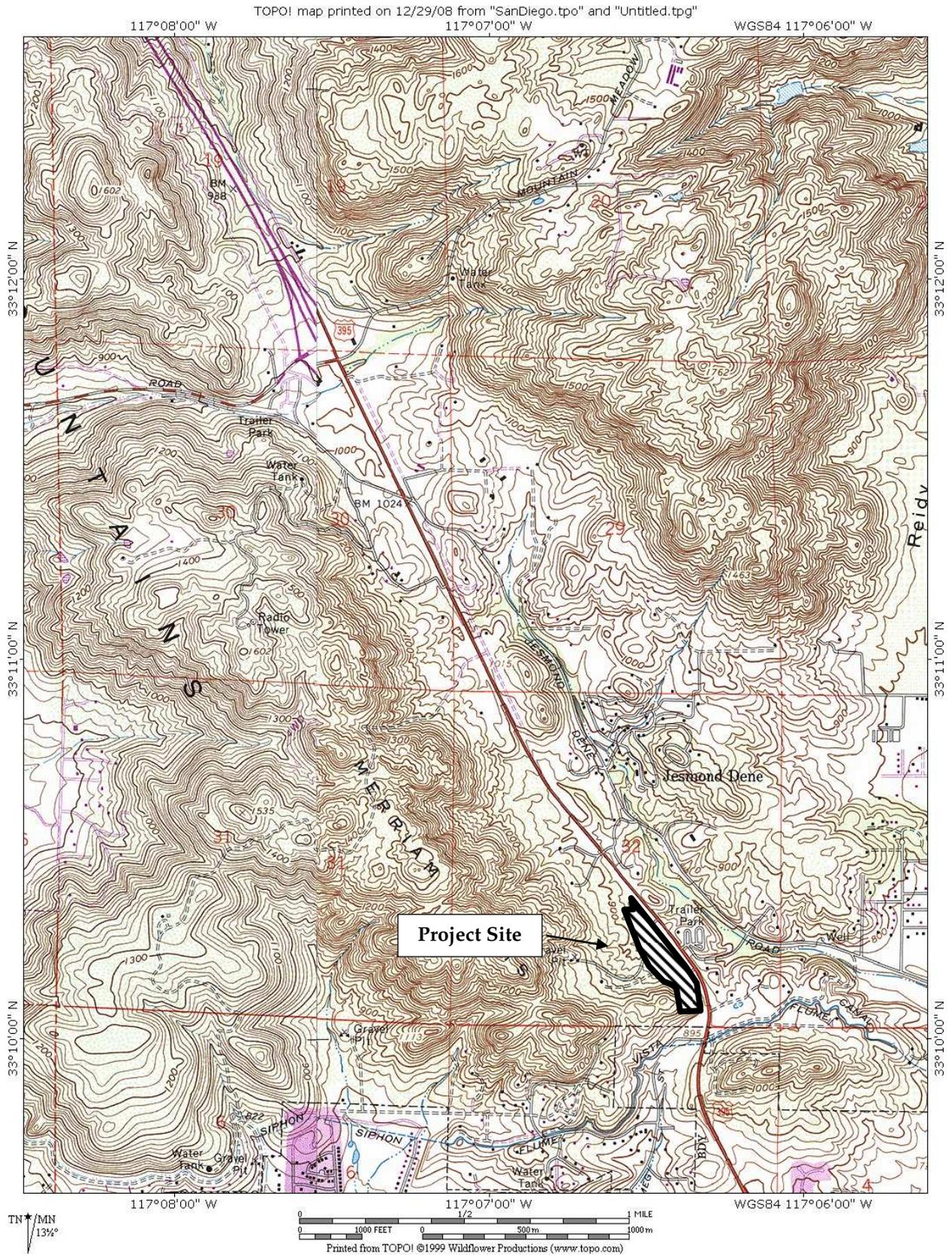


Figure 2. Wetland Exhibit on Site Plan showing RPO and Non-RPO Wetlands and Waters

