

**ADDENDUM TO THE BIOLOGICAL LETTER REPORT
FOR THE FORRESTER CREEK INDUSTRIAL PARK
(RARE PLANT SURVEY)**

Helix Environmental Planning, August 20, 2008



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PBS-04.1

Ms. Diane Catalano
PBS&J
9275 Sky Park Ct., Ste. 200
San Diego, CA 92123

Subject: Addendum to the Biological Letter Report for the Forrester Creek
Industrial Park Project

Dear Ms. Catalano:

This letter presents results of the 2008 rare plant survey and an analysis of impacts to rare plants that would result from the proposed development of the Forrester Creek Industrial Park project.

INTRODUCTION

The approximately 31.5-acre project site is located in El Cajon, California west of Gillespie Field Airport (Figure 1). Specifically, the project site is located north of Weld Boulevard, south of Prospect Avenue, and west of Cuyamaca Street. According to the U.S. Geological Survey, the site is located in the 7.5-minute El Cajon quadrangle in Township 15 South Range 1 West (Figure 2).

The project proposes to construct approximately 470,500 square feet of multi-tenant industrial space, combining light industrial and warehouse uses.

SURVEYS AND METHODS

HELIX Environmental Planning, Inc. (HELIX) biologist Sally Trnka conducted a rare plant survey on July 23, 2008. The survey was conducted by slowly walking the site. Rare plants were mapped on a 1"=200' scale aerial photograph. Samples of sensitive plant species were collected and independently keyed out by Ms. Trnka and HELIX biologist W. Larry Sward.

Plant nomenclature used in this report comes from Hickman, ed. (1993) or Simpson and Rebman (2001). Plant species status is taken from California Native Plant Society (CNPS; 2008).



RESULTS

A total of 3 sensitive plant species were observed on site: San Diego ambrosia (*Ambrosia pumila*), smooth tarplant (*Centromadia pungens* ssp. *laevis*), and graceful tarplant (*Holocarpha virgata* ssp. *elongata*). These species are discussed below.

San Diego ambrosia (*Ambrosia pumila*)

Listing: FE/--; CNPS List 1B.1

Distribution: Coastal San Diego and western Riverside Counties; Baja California, Mexico. Known in California from fewer than 20 occurrences.

Habitat: Found in a variety of habitats, including sage scrub, grasslands, wetlands, disturbed habitat, and sloped areas. Reiser (2001) states that preferred habitats are in creek beds, seasonally dry drainages, and floodplains, and the Federal Registry announcement for this species states that it is found in grasslands and valley bottoms. It is likely a function of soil and moisture rather than a specific habitat that determine the species' territory.

Status on site: Approximately 250 stems (species grows via rhizomes therefore actual number of plants is indeterminate) were observed in the central portion of the site (Figure 3)

Smooth tarplant (*Centromadia pungens* ssp. *laevis*)

Listing: --/--; CNPS List 1B.1; CA Endemic

Distribution: San Diego, Orange, Riverside, Los Angeles, Kern, and San Bernardino counties below approximately 1,500 feet in elevation

Habitat: Valley and foothill grasslands, particularly near alkaline locales

Status on site: Four individuals were observed at the southeast end of the site (Figure 3)

Graceful tarplant (*Holocarpha virgata* ssp. *elongata*)

Listing: --/--; CNPS List 4.2; CA Endemic

Distribution: San Diego, Orange, and Riverside counties

Habitat: Coastal mesas and foothills with grassland habitats

Status on site: Approximately 950 individuals in 2 patches in the central and eastern portions of the site (Figure 3)

REGULATORY CONTEXT

Administered by the U.S. Fish and Wildlife Service (USFWS), the federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the ESA. Section 9(a) of the ESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such



conduct.” ‘Harm’ and ‘harass’ are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species’ behavioral patterns.

Sections 7 and 10(a) of the federal ESA regulate actions that could jeopardize endangered or threatened species. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. A biological assessment is required for any major construction activity if it may affect listed species. In this case, take can be authorized via a letter of biological opinion, issued by the USFWS for non-marine related listed species issues. A Section 7 consultation (formal or informal) is required when there is a nexus between endangered species’ use of the site and impacts to Corps jurisdictional areas. Section 10(a) allows issuance of permits for incidental take of endangered or threatened species with preparation of a habitat conservation plan (HCP). The term “incidental” applies if the taking of a listed species is incidental to, and not the purpose of, an otherwise lawful activity. An HCP demonstrating how the taking would be minimized and how steps taken would ensure the species’ survival must be submitted for issuance of Section 10(a) Permits. It is likely that a Section 7 permit would be required for the proposed project given the nexus between potential Corps jurisdictional areas and the federally listed San Diego ambrosia.

IMPACTS

The proposed project would impact the three sensitive plant species observed on site. Impacts to San Diego ambrosia would be significant due to the status (federal endangered) of the species. Impacts to smooth tarplant would be less than significant given the low number (4) of individuals that would be impacted. Although a large number (950 individuals) of graceful tarplant were observed on site, impacts to this species also would be less than significant due to the low sensitivity of the species.

MITIGATION MEASURES

Impacts to 250 stems of San Diego ambrosia shall be mitigated through translocation. A San Diego Ambrosia Translocation Plan shall be prepared and submitted to the USFWS for review. Approval of the San Diego Ambrosia Translocation Plan and translocation site, proof of recordation of an open space easement over the area in which the translocation would occur, and implementation of the San Diego Ambrosia Translocation Plan shall be required prior to issuance of a grading permit.



CONCLUSION

Implementation of the proposed project would result in impacts to San Diego ambrosia, a federal listed endangered plant species. Impacts to this sensitive plant species would be reduced to below a level of significance following implementation of a translocation plan.

Please contact Derek Langsford or me if you have any questions.

Sincerely,

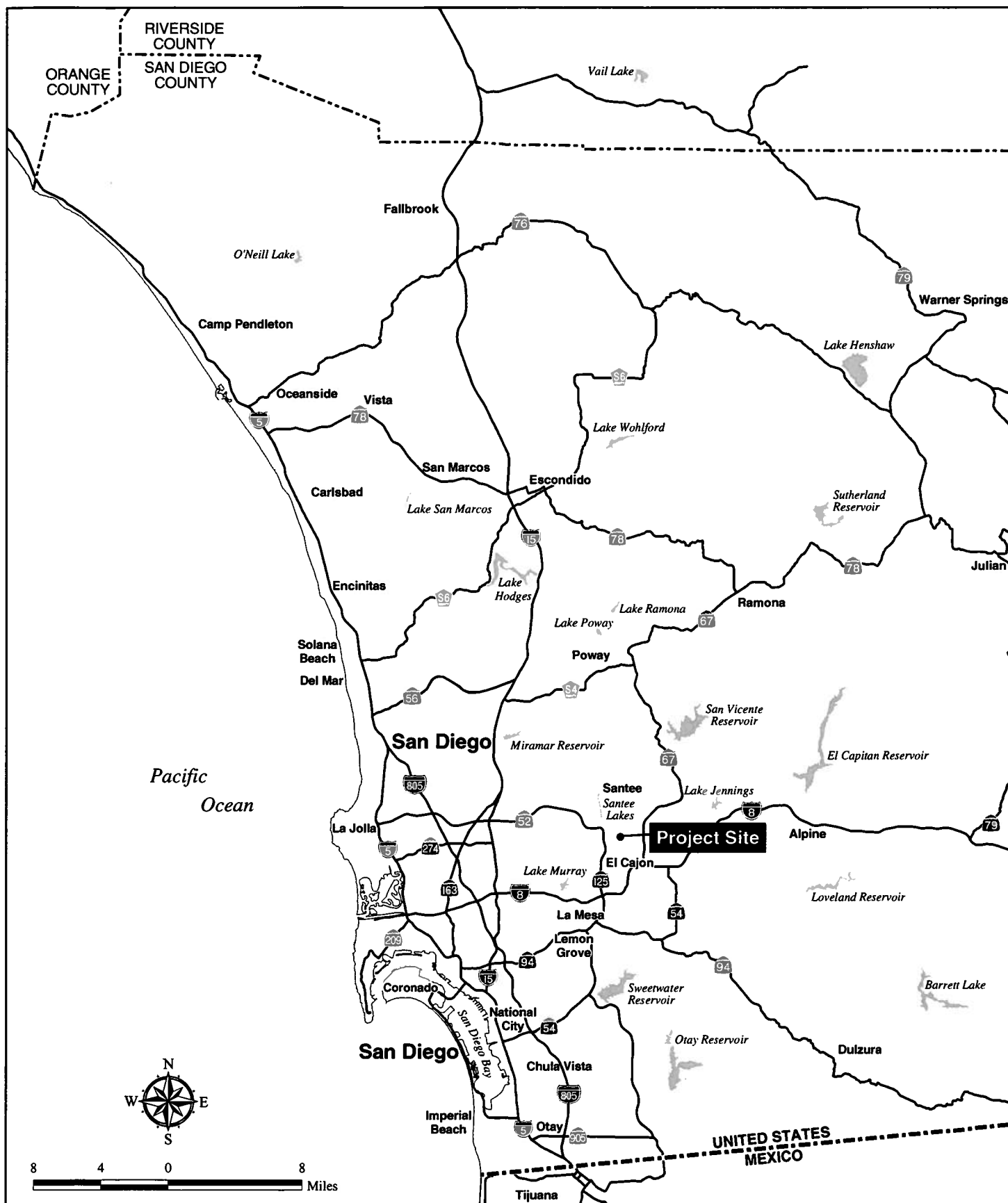
A handwritten signature in cursive script that reads "Sarichia Cacciatore".

Sarichia Cacciatore
Project Manager

Enclosures: Figure 1 Regional Location Map
2 Project Vicinity Map
3 Vegetation and Sensitive Resources - Impacts

REFERENCES

- California Native Plant Society (CNPS). 2008. Inventory of Rare and Endangered Plants. Internet searchable database Version 7-08c. URL: <http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi> Updated quarterly. July 9.
- Hickman, J.C., ed. 1993. The Jepson Manual: Higher Plants of California. University of California Press, Berkeley, 1400 pp.
- Reiser, Craig. 2001. Rare Plants of San Diego County. Aquafir Press. May.
- Simpson, M.G. and J.P. Rebman. 2001. Checklist of Vascular Plants of San Diego County. SDSU Herbarium Press, San Diego, California.



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Regional Location Map

FORRESTER CREEK

Figure 1



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Rare Plant Survey 07/23/2008

FORRESTER CREEK

HELIX

