

Supplement to Draft PEIR Appendix B

Biological Technical Report Addendum for the
McClellan-Palomar Airport Master Plan: Impacts
and Mitigation Summary of Eastern Parcel

(Helix Environmental Planning,
dated May 31, 2018)

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May 31, 2018

CSD-05.14

Ms. Cynthia Curtis
Department of Public Works, Environmental
5510 Overland Ave, Suite 410
San Diego, CA 92123

Subject: Biological Technical Report Addendum for the McClellan-Palomar Airport Master Plan: Impacts and Mitigation Summary of Eastern Parcel

Dear Ms. Curtis:

This letter summarizes potential impacts to biological resources on County Airports-owned property on the 18.8-acre Eastern Parcel study area of the McClellan-Palomar Airport (Airport) Master Plan (Master Plan; project), which is a part of a larger County of San Diego (County)-owned parcel east of El Camino Real. These impacts are associated with the potential shifts of existing Federal Aviation Administration (FAA)-owned navigational aid lighting on the Eastern Parcel from its current location approximately 123' further north on the parcel to line up with the associated shift in the runway on the Airport site (Figure 1).

The purpose of this report is to provide an analysis of potential impacts to sensitive biological resources within the Eastern Parcel with respect to local, state, and federal regulations. These impacts, which were not analyzed in the 2018 Draft Program Environmental Impact Report (Draft PEIR; County 2018) or the Biological Resources Technical Report (BTR) for the project (HELIX 2017), are addressed in this supplemental document. The existing biological conditions within the Eastern Parcel are described within the 2017 BTR. This supplemental letter report provides the biological resources technical documentation necessary for review of the Eastern Parcel impacts under the California Environmental Quality Act (CEQA) by the County and other responsible agencies for the project and is intended to supplement the information provided in the 2018 Draft PEIR and 2017 BTR for the project.

EASTERN PARCEL PROJECT COMPONENTS

In addition to the project components described in the 2017 BTR, the project may relocate the existing navigation aids known as Medium-intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR) on the Eastern Parcel. The MALSR is a system of lights that provides pilots with navigational assistance at the runway end. It is anticipated that with the shift of the runway to the north, a corresponding shift in the location of the existing MALSR lights footings, and associated access road would be needed. FAA design standards require a 20'-wide maintenance access road to and between each lighting structure. Entry to the proposed access road will be via the existing curb entry at El Camino Real. It is anticipated that once installation of the new MALSR location is completed, the existing gravel access road and light structures would be removed as they are no longer necessary.

Figure 1 shows the conceptual layout of MALSR structures if relocation is deemed necessary by FAA. The FAA-required 20'-wide gravel access road would extend approximately 1200' east from El Camino Real with light structures installed every 200'. Each structure would sit on a concrete pad of approximately 10'x10'. Conduit would be trenched in between concrete pads underneath the gravel access road. If the runway is extended an additional 200' in its current alignment, an additional concrete pad and lighting structure would be placed 200' east of the existing lighting, in line with the existing access road along the MALSR's existing location. Electrical lines would be extended underground to the new structure by an approximately 4'-wide trench and would be considered a temporary impact.

The FAA is the owner and responsible agency for all aspects of this navigational aid lighting system (i.e. layout and placement of the structure according to FAA design standards, property ownership, maintenance, etc.), and relocation of the lights would be considered a federal action. The FAA has an existing lease with the County for the current MALSR system at the Eastern Parcel, and has the ability to manage the structure as they deem necessary for airport safety. Although this project element was shown and described in the PEIR released for public review, the conceptual placement and alignment of the light relocation was not designed or calculated for potential impacts. This Eastern Parcel component is being analyzed now to describe the potential impacts to biological resources on the County-owned property if or when the FAA funds relocation of the structures and access road.

SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

This section provides a biological resources impact analysis for the proposed impacts within the Eastern Parcel. The issues addressed in this section are derived from Appendix G of the State CEQA Guidelines and the County's Biology Guidelines (County 2010). Mitigation, monitoring, and reporting requirements to eliminate or reduce project impacts to a less than significant level are also provided in this section.

Issue 1: Special-status Species

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

Issue 1 Impact Analysis

Construction of a new access road and MALSR lighting on the Eastern Parcel would result in impacts to one special status plant species, Nuttall's scrub oak (*Quercus dumosa*), in addition to affecting 0.33 acre of USFWS designated critical habitat for San Diego thorn-mint (*Acanthomintha ilicifolia*). These impacts are further discussed below.

Non-native grassland within the Eastern Parcel supports potential foraging habitat for raptors known to the local area, including common species such as red-tailed hawk (*Buteo jamaicensis*), and potentially for sensitive species such as white-tailed kite (*Elanus leucurus*) and barn owl (*Tyto alba*), although these species were not detected during project surveys. In accordance with FAA regulatory guidance in 14 Code of Federal Regulations 139.337(e), the Airport also is subject to a Wildlife Hazard Management Plan (WHMP; C&S 2015) as approved by the FAA in 2016. The WHMP outlines the recommended actions and responsibilities of Airport personnel to manage and reduce the risks that wildlife pose to aircraft operations at the Airport. Components of the WHMP include wildlife control actions such as habitat management, hazing, and harassment. The FAA requires a zero-tolerance for hazardous wildlife on the airfield within the framework of federal and state regulations. Impacts to 0.3 acre of non-native grassland would not result in the significant impacts to functional foraging habitat for raptors due to the very small acreage of impact. Further, a northward shift of the navigational lighting on the Eastern Parcel would not result in a significant indirect impact to wildlife as the shift is a continuation of an existing use and would not increase the existing night lighting levels in this area, which is also subject to existing light pollution from adjacent streets and development. For these reasons it is anticipated that the shift of navigational lighting on the Eastern Parcel would not cause new indirect impacts to wildlife.

Special status animal species were not observed within the Eastern Parcel, although four species were identified in Appendix B of the Draft PEIR as having high potential to occur: orange-throated whiptail (*Cnemidophorus hyperythrus*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), Coronado skink (*Eumeces skitonianus interparietalis*), and barn owl. None of these species are federally or state listed; all four species are County Group 2¹ animals. The northward shift of the navigational lighting does not have potential to directly impact barn owl

¹ Animals that are becoming less common but are not yet so rare that extirpation or extinction is imminent without immediate action. These species tend to be prolific within their suitable habitat types.

as no suitable nesting habitat is present in the impact area; the only potential impact is to foraging habitat, which is addressed in the preceding paragraph. The northward shift of the navigational lighting has potential to directly impact orange-throated whiptail, coastal western whiptail, and Coronado skink, however, any such impacts would be less than significant as these species are not considered highly sensitive by the Wildlife Agencies (USFWS and CDFW) or County, the small area of impact would not affect the local long-term survival of the species, and adequate conservation of habitat would occur in areas immediately adjacent to and extending further out from the impacts. Thus, no significant impacts are expected to occur. Further, the project would not impact habitat for arroyo toad (*Anaxyrus californicus*), golden eagle (*Aquila chrysaetos*), burrowing owl (*Athene cunicularia*), cactus wren (*Campylorhynchus brunneicapillus*), or Hermes copper butterfly (*Lycaena hermes*).

Nuttall's Scrub Oak

Implementation of the MALSRL lighting and associated access road would impact 0.3 acre of southern maritime chaparral dominated by Nuttall's scrub oak. Impacts to Nuttall's scrub oak, which is a County List A species and has a California Rare Plant Rank (CRPR) designation of 1B.1 (as listed by California Native Plant Society), would be less than significant, as the Eastern Parcel contains 9.8 acres of scrub oak-dominated southern maritime chaparral and the project would impact less than five percent of this habitat type within the study area. Further, several acres of habitat supporting this species would remain unaffected within the study area, as well as extensive areas off site to the east and north. Thus, project implementation would not have a substantial adverse effect on the local long-term survival of Nuttall's scrub oak; impacts are less than significant.

San Diego Thorn-mint

Based on results of rare plant surveys conducted in 2016 and a review of database records in the project vicinity (USFWS 2016 and CDFW 2016), San Diego thorn-mint is absent from the proposed impact area and the nearest location is approximately 85 feet from the project footprint. Thus, implementation of the MALSRL lighting and associated access road would not directly impact known locations of San Diego thorn-mint, a federal threatened, state endangered, County List A, and CRPR 1B.1 species.

A total of 10.2 acres of critical habitat for this species occurs within the 18.8-acre Eastern Parcel study area, with an additional 49.3 acres of thorn-mint critical habitat occurring adjacent to the study area. The proposed project would impact 0.33 acre of critical habitat for San Diego thorn-mint. A total of 0.25 acre of this impact is within scrub oak-dominated mature chaparral, most of which does not have suitable soil types (i.e. heavy clay soil) or a sufficiently open canopy to support thorn-mint. Impacts also would occur within 0.08 acre of disturbed habitat supporting clay soils, which could be potentially suitable for the species, but within which surveys have been negative. In addition, potential northward shifts of existing FAA-owned navigational aid

lighting on the Eastern Parcel would not result in indirect impacts to San Diego thorn-mint for the following reasons: the relocated road and lighting would be set back approximately 85 feet from the nearest known occurrence of San Diego thorn-mint; earthwork associated with the relocation of the road and lighting would not alter existing drainage patterns for the known population; and there is no public access to the site, thus no increase in potential human-related disturbance. For these reasons, proposed impacts to 0.33 acre of critical habitat for San Diego thorn-mint are considered less than significant and would not represent an adverse modification to the critical habitat. However, as part of the regulatory requirements for the project, the FAA would be required to consult with the USFWS for any proposed impact to critical habitat and would be responsible for implementing all terms and conditions resulting from the consultation.

Issue 1 Mitigation Measures

None required.

Conclusions

Implementation of the MALSR lighting and associated access road would not result in significant impacts to special status species or their critical habitat, and no mitigation is required.

Issue 2: Sensitive Natural Communities

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?

Issue 2 Impact Analysis

Implementation of the MALSR lighting and associated access road would result in direct impacts to approximately 0.3 acre of southern maritime chaparral, and 0.3 acre of non-native grassland. These impacts would be significant according to County Guideline 4.1.A.

Table 1 provides a summary of project impacts to vegetation communities/habitat types on the Eastern Parcel, including sensitive habitat. The impacts are separated into Pre-approved mitigation area (PAMA)/preserve, take authorized, and outside PAMA pursuant to the Draft North County Multiple Species Conservation Program (NC MSCP). The 18.8-acre Eastern Parcel consists primarily of County-owned open space that is designated as a combination of Preserve and PAMA under the Draft NC MSCP Plan.

Table 1 IMPACTS TO VEGETATION COMMUNITIES ON THE EASTERN PARCEL					
Vegetation Community ²	Existing ¹	PERMANENT IMPACTS ¹			
		PAMA/ Preserve	Take Authorized	Outside PAMA	Total Impacts
Southern Maritime Chaparral (37C30)	9.8	0.3	0	0	0.3
Non-Native Grassland (42200)	4.3	0.2	0.1	0	0.3
Disturbed Habitat (11300)	4.4	0.1	0	0	0.1
Developed (12000)	0.3	0	0	0	0
TOTAL	18.8	0.6	0.1	0	0.7

¹ Rounded to the nearest 0.1 acre.

² Vegetation categories and numerical codes are from Holland (1986) and Oberbauer (2008).

Issue 2 Mitigation Measures

Mitigation for impacts to sensitive vegetation communities described herein is consistent with the mitigation strategy outlined in the 2011 Hardline letter (USFWS and CDFW 2011), which assumed adoption of the NC MSCP prior to project-specific impacts. Measures **M-BI-7** and **M-BI-8**, would mitigate for impacts to 0.3 acre of southern maritime chaparral and 0.3 acre of non-native grassland, respectively. The numbering of these mitigation measures follows the identification methodology used for the biological mitigation measures contained in the PEIR. The biological mitigation measures in the Draft PEIR begin with M-BI-1 and end with M-BI-6, thus, new measures contained herein begin with M-BI-7.

M-BI-7 Mitigation for impacts to 0.3 acre of southern maritime chaparral shall occur at a 3:1 ratio through the preservation of 0.9 acre of southern maritime chaparral in the planning area of the NC MSCP or at another location deemed acceptable by the County and Wildlife Agencies.

M-BI-8 Mitigation for impacts to 0.3 acre of non-native grassland shall occur at a 0.5:1 ratio through the preservation of 0.15 acre of non-native grassland in the planning area

of the NC MSCP or at another location deemed acceptable by the County and Wildlife Agencies.

Table 2 provides a summary of mitigation for impacts to sensitive vegetation communities on the Eastern Parcel.

Table 2			
MITIGATION FOR IMPACTS TO VEGETATION COMMUNITIES ON THE EASTERN PARCEL			
Vegetation Community²	Impacts¹	Mitigation	
		Ratio	Required¹
Southern Maritime Chaparral (37C30)	0.3	3:1	0.9
Non-Native Grassland (42200)	0.3	0.5:1	0.15
Disturbed Habitat (11300)	0.1	0	0
TOTAL	0.7	0	1.05

¹ In acre(s) rounded to the nearest tenth.

² Vegetation categories and numerical codes are from Holland (1986) and Oberbauer (2008).

Conclusion

The additional project features described herein would result in significant impacts to sensitive natural communities on the Eastern Parcel. Implementation of measures **M-BI-7** and **M-BI-8** would reduce these impacts to less than significant.

Issue 3: Jurisdictional Wetlands and Waterways

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?

Issue 3 Impact Analysis

No federally protected wetlands occur within the Eastern Parcel and the project would not impact federally protected wetlands.

Issue 3 Mitigation Measures

None required.

Conclusion

The additional project features described herein would not result in impacts to federally protected wetlands, and no mitigation is required.

Issue 4: Wildlife Movement and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?

Issue 4 Impact Analysis

Construction of a new access road and MALSR lighting on the Eastern Parcel would not impede the movement of any native, resident, or migratory fish or wildlife species or with established native, resident, or migratory wildlife corridors, or interfere with native wildlife nursery sites. This is a narrow, restricted-use, very low-volume access road that would not have fencing or other potential impediments to wildlife movement or interrupt visual continuity. No impact would occur.

MALSR lighting currently exists in the Eastern Parcel and the shifting of the lighting approximately 123 feet north of the current location would not substantially increase nighttime lighting in this area. Impacts would be less than significant.

Issue 4 Mitigation Measures

None required.

Conclusion

Implementation of the MALSR lighting and associated access road would not result in significant impacts on wildlife movement or nursery sites on the Eastern Parcel. No mitigation is required.

Issue 5: Local Policies and Ordinances

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Issue 5 Impact Analysis

With the exception of potential impacts to nesting birds, the project would not conflict with any other local policies or ordinances protecting biological resources. The project would not conflict

with the County's wetland and wetland buffer protection policies, as no wetlands or wetland buffer would be impacted on the Eastern Parcel.

The proposed project is an essential public project that is exempt from the Resource Protection Ordinance (RPO) under Section 86.605(c). No impact would occur.

The project does not occur within an adopted Multiple Species Conservation Program (MSCP) planning area and the Biological Mitigation Ordinance (BMO) does not apply. No impact would occur.

Improvements within the Eastern Parcel would not impact Diegan coastal sage scrub; thus, no impact would occur with regard to the County's five percent coastal sage scrub habitat loss threshold or mitigation requirements for sage scrub.

Nesting Birds

The Eastern Parcel contains suitable nesting habitat for several bird species protected under the Migratory Bird Treaty Act (MBTA) and California Fish & Game (CFG) Code. Construction of the project during the avian breeding season (February 15–August 31) could potentially result in impacts to migratory birds or destruction of active migratory bird nests and/or eggs protected under the MBTA. Project construction could directly impact individuals or cause breeding birds to temporarily or permanently leave their territories, which could lead to reduced reproductive success and increased mortality. These impacts would be significant under County Guideline 7.1.K.

Issue 5 Mitigation Measures

Nesting Birds

Potential impacts to nesting birds protected under the MBTA and CFG Code would be mitigated through implementation of the mitigation measure **M-BI-6**, as provided in the Draft PEIR and reiterated below:

M-BI-6 If grubbing, clearing, or grading must occur during the general avian breeding season (February 15–September 15), a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of the activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, clearing, grubbing, and grading shall be allowed to proceed. Furthermore, if construction activities are to resume in an area where they have not occurred for a period of seven or more days during the breeding season, an updated survey for avian nesting will be conducted. If active nests or nesting birds are observed within the area, the biologist

shall flag the active nests and construction activities shall avoid active nests until nesting behavior has ceased, nests have failed, or young have fledged.

Conclusion

The additional project features described herein would result in potentially significant impacts to nesting birds on the Eastern Parcel if construction occurred within the general avian breeding season. Implementation of measure **M-BI-6** would reduce this impact to less than significant.

Issue 6: Adopted Conservation Plans

Would the project conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP), or other approved local, regional, or state habitat conservation plan?

Issue 6 Impact Analysis

No adopted HCP, Resource Management Plan, Special Area Management Plan, Watershed Plan, or other regional planning efforts are applicable to the project. As such, the project would not conflict with any adopted plans. No impact would occur.

The project would not preclude or prevent the preparation of the subregional NCCP (draft NC MSCP), as only 0.6 acre of impact would occur within lands identified as PAMA or preserve under the Draft NC MSCP, and these small areas of proposed impact are not critical areas for assemblage of the preserve, particularly considering the existing preserve lands northwest of the Airport site and the large areas of PAMA that would remain unaffected on County-owned lands within and adjacent to the Eastern Parcel. The proposed project would not preclude or prevent approval and adoption of the Draft NC MSCP, and no significant impact would occur.

Issue 6 Mitigation Measures

No mitigation is required.

Conclusion

Project implementation would not conflict with the provisions of an approved habitat conservation plan or preclude or prevent the preparation of the subregional NCCP. No mitigation is required.

SUMMARY

Potential impacts on the Eastern Parcel associated with the relocation of navigational lighting result in the inclusion of two additional mitigation measures: **M-BI-7** and **M-BI-8**. With implementation of these additional mitigation measures for significant impacts to sensitive biological resources, project-specific impacts would be mitigated to less than significant.

We appreciate the opportunity to provide you with this letter report. Please do not hesitate to contact me at 619-462-1515 if you have any questions or require further assistance.

Sincerely,

Stacy Nigro
Principal Biologist

Enclosures:

Figure 1 – Vegetation and Sensitive Biological Resources/Impacts on Eastern Parcel

REFERENCES

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